

SECTION THREE

RESPONSES TO COMMENTS

This section contains the letters of comment that were received on the Revised Draft EIR and Partially Recirculated Revised Draft EIR. Following each comment letter is a response intended to either supplement, clarify, or amend information provided in the Revised Draft EIR and Partially Recirculated Revised Draft EIR, or refer the commenter to the appropriate place in the documents where the requested information can be found. Those comments that are not directly related to environmental issues may be discussed and noted for the record.



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

May 19, 2006

Paul Thompson
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

RECEIVED
MAY 23 2006

Subject: Placer Vineyards Specific Plan Revised Draft EIR (PROJECT 200540651)
SCH#: 1999062020

Dear Paul Thompson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 18, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 1999062020
Project Title Placer Vineyards Specific Plan Revised Draft EIR (PEIR T200540651)
Lead Agency Placer County Planning Department

Type EIR Draft EIR
Description The Placer Vineyards Specific Plan project is a mixed-use master planned community with residential, employment, commercial, open space, recreational and public/quasi-public land use. The Plan provides for 14,132 homes in a range of housing types, styles, and densities. At Plan build out, projected to occur over a 20 to 30-year time frame, Placer Vineyards will have a population of approximately 33,000 people, 422.5 acres of employment centers, 140 acres of retail commercial centers and approximately 930 acres of new parks and open space.

Lead Agency Contact

Name Paul Thompson
Agency Placer County Planning Department
Phone (530) 889-7470 **Fax**
email
Address 11414 B Avenue
City Auburn **State** CA **Zip** 95603

Project Location

County Placer, Sacramento, Sutter
City Roseville
Region
Cross Streets Baseline Road, Pleasant Grove Road, Dry Creek Road, Walerga Road
Parcel No. various
Township 10N **Range** 5E **Section** Varfou **Base** MDB&M

Proximity to:

Highways 99, I-80
Airports McClellan
Railways Union Pacific
Waterways Dry Creek, Curry Creek
Schools Center HS & ES, Dry Creek ES, Wood Creek HS
Land Use Undeveloped grazing land and marginal agricultural land/various

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Health Services; Department of Housing and Community Development; Office of Emergency Services; Department of Fish and Game, Region 2; Department of Water Resources; California Highway Patrol; Caltrans, District 3; Caltrans, Division of Aeronautics; Air Resources Board, Transportation Projects; Department of Toxic Substances Control

Date Received 04/04/2006 **Start of Review** 04/04/2006 **End of Review** 05/18/2006

LETTER I TERRY ROBERTS, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

Response IA: Comment noted. All letters received from the Clearinghouse are included in Section Three and, in accordance with CEQA Guidelines Section 15088, written responses to all comments received are provided herein.



April 20, 2006

RECEIVED
APR 21 2006

Letter 2

Wastewater Treatment

Technology in balance with nature

10545 Armstrong Avenue
Mather, CA 95655
Tele: [916] 876-6000
Fax: [916] 876-6160
Website: www.srcsd.com

PLANNING DEPT.

Lori Lawrence
Placer County Community Development Resource Agency
Environmental Coordination Services
11414 "B" Avenue
Auburn, CA 95603

Dear Ms. Lawrence:

Subject: Placer Vineyards Specific Plan Revised Draft EIR, PEIR-T200540651, SCH #1999062020

Board of Directors
Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

County Sanitation District 1 (CSD-1) and Sacramento Regional County Sanitation District (SRCSD) staff have reviewed the Placer Vineyards Specific Plan Revised Draft Environmental Impact Report (EIR). The project is outside the CSD-1 and SRCSD service area boundaries and the Sacramento County Urban Services Boundary as delineated in the 1993 Sacramento County General Plan. However, staff evaluated the potential utilization of SRCSD facilities as an option for wastewater conveyance from the proposed project.

In general, the Revised Draft EIR is consistent with previous discussions between Placer County and SRCSD regarding provision of sanitary sewer service. It should be noted that SRCSD facilities are designed to handle only the peak wet weather flows expected from the SRCSD ultimate service area. A facility for the storage of the Placer Vineyards peak wet weather flow for later discharge at off-peak hours would be required. SRCSD would require that this facility be located in Placer County. The SRCSD is not considering the construction of a wastewater storage facility near the intersection of Interstate 5 and Interstate 80, as mentioned in the Revised Draft EIR.

Should you have any questions, please call me at (916)876-6114.

Sincerely,

Robert D. Hedges
Senior Civil Engineer

- cc: Wendell H. Kido
Christoph Dobson
Neal Allen
Ruben Robles
Melanie Spahn

- Mary K. Snyder
District Engineer
- Stan R. Dean
Plant Manager
- Wendell H. Kido
District Manager
- Marcia Maurer
Chief Financial Officer

LETTER 2 ROBERT HEDGES, SACRAMENTO REGIONAL COUNTY SANITATION DISTRICT

Response 2A: The comment addresses potential wastewater treatment and disposal service by SRCSD for “Shed A.” The point is made by the commenter that if flows were to be conveyed to SRCSD, a facility for storage of peak flows would need to be provided for off-peak wastewater releases in Placer County. Therefore, as shown on revised Figure 3-17B (see Section Four of this Final EIR), the proposed project and Blueprint Alternative now provide for an on-site wastewater storage tank that will be used if SRCSD becomes the wastewater treatment provider. The tank would replace and be located at the same location where a proposed sewer lift station would be constructed if the SPWA were to become the wastewater treatment provider for Shed A of the project (see revised Figure 3-17A in Section Four of this Final EIR). With the wastewater storage tank now proposed to be located on-site, SRCSD Connection Alternative B would be used to transport wastewater to Elverta Road (see Revised Draft EIR Figure 3-6).

The third paragraph on page 4.11-40 of the Revised Draft EIR is also updated as follows:

To accommodate the additional flows into the Northwest Interceptor (NWI) system, if all the flows projected for the NWI occur and the facility nears capacity, it could become necessary to construct an offline wastewater storage tank. ~~near the intersection of Interstate 5 and Interstate 80.~~ Construction of such a storage tank would allow wastewater to be stored until the peak period flow recedes and the pipeline is able to accommodate the flow. A storage tank to accommodate the additional flows is proposed within the Specific Plan area as shown on Figure 3-17B-3-5. This is the same site on which a sewer lift station would be constructed under the DCWWTP option.~~Connection to the system would be allowed prior to construction of this storage tank, but the District’s Master Plan would need to be amended to incorporate this additional improvement and a fee structure to finance it.~~

RMC has provided the following calculations for use in sizing a storage tank for both the proposed project and Blueprint Alternative. The storage volumes were calculated using the hydraulic modeling program H2OMAP Sewer Pro, using the model currently used by the SPWA:

Proposed Project:

Peak Wet Weather Flow (PWWF) = 7.33 mgd
Peak Dry Weather Flow (PDWF) = 4.40 mgd
Average Dry Weather Flow (ADWF) = 2.20 mgd

If the flow constraint to SRCSD is PDWF, then 0.32 mg of storage is needed. If flow constraint to Sac Regional is ADWF from PV then 1.63 mg of storage is needed.

Blueprint Alternative:

PWWF = 8.93 mgd

PDWF = 6.08 mgd

ADWF = 3.05 mgd

If flow constraint to SRCSD is PDWF, then 0.25 mg of storage is needed. If flow constraint to SRCSD is ADWF, then 1.74 mg of storage is needed.

The RMC ADWF is slightly less than the MacKay & Soms Sewer Master Plan ADWF for the area west of Watt Avenue. MacKay & Soms separated the PVSP area into two general sewer sheds, one shed for the area west of Watt Avenue (Shed A), and a second for the area east of Watt Avenue (Shed B). RMC generally divided the PVSP area into sheds in the same fashion but RMC did include a small area west of Watt Avenue near Dry Creek in their easterly shed. This leads to a RMC ADWF value slightly less than the MacKay & Soms value for Shed A and a RMC ADWF value for Shed B, which is slightly greater than the MacKay & Soms value for Shed B. When the shed values are added together the RMC ADWF for the entire PVSP area is the same as the MacKay & Soms ADWF value for the entire PVSP area.

Based on the modeling calculations, the largest volume of storage required is 1.74 million gallons using ADWF as the constraint for the Blueprint Alternative. This volume has been increased slightly by rounding to 1.8 million gallons. Using the largest calculated volume provides the most conservative approach to quantifying the impacts of the storage facility.

A sanitary sewer lift station to serve the westerly portion of the Placer Vineyards Specific Plan area will not be required if the gravity sewer alternative to the SRCSD is selected. In its place, a wastewater storage facility would be constructed adjacent to the easterly edge of Locust Road, south of the Open Space designation, and north of 18th Avenue. Details of the wastewater storage tank are depicted on Final EIR Figure 1.

The storage facility would be an underground, reinforced concrete storage tank capable of holding 1.8 million gallons of effluent. The tank would be sized to have additional freeboard between the water surface required for the storage volume and the top of the tank. Access would be provided to the storage facility for maintenance and monitoring purposes. The bottom of the tank would be located approximately 32 feet below grade with the top of the tank approximately 20 feet below grade.

Wastewater flow will be diverted at a manhole or similar junction structure from the sewer trunk line in Locust Road into the storage facility and held until off-peak hours when effluent will be discharged back into the trunk line for conveyance to the SRCSD wastewater treatment plant. The combination of short storage duration and an automated flushing system will minimize the creation of odors in the tank.

A system of passive odor control is proposed for the storage facility. Air from the facility will be vented to the surface through a piping system that will emit the vented air through a bio-filter

media located between the storage facility and the surface. The bio-filter media will trap odors from the airflow before the flow reaches the surface.

An automated system is proposed to provide routine flushing of the facility. The system will use a piped sprinkler system to flush the interior of the storage facility after each storage event. The system will be activated after each storage event after wastewater flows are discharged from the facility.

Routine maintenance of the storage facility will include an annual, visual inspection of the tank interior by maintenance personnel. The same personnel will also hose down and clean the tank interior to remove any debris/buildup not removed by the automated system. Access to the interior of the facility for personnel and cleaning equipment will be provided. Wastewater flow would be diverted at a manhole or similar junction structure from the sewer trunk line in Locust Road into the storage facility. Effluent would be held in the tank until off-peak hours when it would be discharged back into the trunk line in Locust Road for conveyance to the SRCSD wastewater treatment plant.

Construction of the storage facility will require the excavation of an open area large enough for the tank footprint and working space around the footprint. Excavation for the facility will be undertaken in conformance with a geotechnical report prepared specifically for construction of the storage tank in accordance with Revised Draft EIR Mitigation Measure 4.5-1a.

If the storage facility site is excavated using open cut methods it is anticipated that side slopes will be cut at a slope not to exceed 1:1. Using this slope criteria the excavation side slopes will be approximately 35 feet wide. Using this dimension together with an allowance for a work area adjacent to the side of the facility it is proposed that the storage facility not be placed closer than 50 feet from the Locust Road right-of-way. If sheet piling is used, the sides of the excavated areas could be vertical and the structure could be moved closer to the right-of-way.

If open cut methods are used, approximately 60,000 cubic yards of material will be excavated to create the site for construction of the storage tank. The majority of the material will be used to backfill the construction site and cover the underground facility but approximately 10,000 cubic yards of material will be displaced due to the volume of the tank. This excess material will be removed from the storage facility site and utilized in grading operations on projects adjacent to the facility.

If perched groundwater is encountered, a dewatering plan will be developed and utilized to stabilize the site for construction of the storage facility if groundwater is encountered. The plan will include methods for disposing of the groundwater removed to achieve dewatering of the site.

As noted above, the wastewater storage tank would be located where a major sewer lift station would otherwise be constructed if the SPWA were to provide sewer service to Shed A. The lift station and wastewater storage tank would have similar characteristics and result in almost identical effects. In the Revised Draft EIR, effects related to ground disturbance/topographic alteration are addressed under Impact 4.5-4 and Mitigation Measures 4.5-4a through 4.5-4f; potential odors and odor complaints are addressed under Impact 4.8-5 and Mitigation Measure

4.8-5; and noise effects are addressed under Impact 4.9-2 and Mitigation Measure 4.9-2. Similar to the lift station, because the tank will be placed underground, there will be minimal visual intrusion and little potential for land use conflicts to arise. A smaller facility containing a lesser volume could ultimately be constructed. If this were to occur, it will occupy less area, require less excavation, and have the potential to create fewer impacts.

As is apparent from an examination of revised Figure 3-17A, the conceptual site for the lift station discussed in the Revised Draft EIR is slightly north of the currently proposed site for the lift station/wastewater storage tank. From location and land use compatibility (noise and air quality) perspectives, the only difference is that the open space area that was formerly on the south side of the site is now on the north side. In addition to open space, surrounding land uses remain Medium Density Residential and Low Density Residential, as reported in the Revised Draft EIR. Therefore, Revised Draft EIR conclusions as described under Impacts 4.5-4, 4.8-5, and 4.9-2 are not altered by this minor location change.

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

RECEIVED
APR 27 2006

April 21, 2006

PLANNING DEPT

Lori Lawrence
Placer County
11414 B Avenue
Auburn, CA 95603

Dear Ms. Lawrence:

Re: SCH 1999062020; Placer Vineyards Specific Plan Revised Draft EIR (PEIR T200540651)

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the rail corridor in the County be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

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,

A handwritten signature in black ink, appearing to read "Kevin Boles".

Kevin Boles
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Pat Kerr, UP

LETTER 3 KEVIN BOLES, PUBLIC UTILITIES COMMISSION

Response 3A: The PUC recommends that the project be planned with the safety of rail corridors in mind. No active railroad routes border or cross the Placer Vineyards Specific Plan Area nor is an active rail line within active walking distance of the Plan area. Therefore, the proposed project would not substantially increase pedestrian crossings of a rail line.

However, offsite utilities and roadway improvements could be constructed within existing railroad right of ways. The owners of any affected railroad right of ways would be contacted and advised of any activity that could affect their ownership or operations. All steps would be taken during construction to protect the safety of motorists and pedestrians in accordance with standard practices of the railroad and the County.



COUNTY OF SACRAMENTO
MUNICIPAL SERVICES AGENCY – CHERYL CRESON, ADMINISTRATOR
Department of Water Resources
Including service to the Cities of Citrus Heights, Elk Grove and Rancho Cordova
Keith DeVore, Director

April 27, 2006

Lori Lawrence
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Subject: Revised Draft EIR Placer Vineyard Specific Plan

We have reviewed the subject draft EIR and have the following comments regarding hydrology, drainage, and flood control.

1. Shed Maps prepared for both the Master Drainage Study for the Elverta Specific Plan, which borders Placer County, and the Master Project Drainage Study for Placer Vineyards conflict with each other. Sheds maps prepared for the Elverta Plan area are assumed to be more correct for within the Elverta Specific Plan area and shed maps prepared for the Placer Vineyard plan area are assumed to be more correct for within the Placer Vineyards plan area. The shed maps need to be reconciled in order to properly identify and determine downstream impacts. The Placer Vineyards shed map shows the area of Shed EMG within Placer Vineyards draining to Steelhead Creek, however a significant portion of this shed area drains to a lake at Gibson Ranch Park that outfalls to Dry Creek.
2. Volume 1, Page 4.3-21, last paragraph: This paragraph gives the impression that the fair share volume mitigation fee as listed on the Sacramento County Department of Water Resources Fee Schedule for Zone 11C for Sheds Flowing to Steelhead (NEMDC) Tributaries is to mitigate for development in areas draining to Dry Creek. Drainage to Dry Creek is subject to a one time development fee (mitigation measure 4.3.2-1e) and an annual drainage improvement and flood control fee (mitigation measure 4.3.2-1f). Development within the NEMDC Tributary watersheds is subject to a fair share stormwater volume mitigation fee to Sacramento County (mitigation measure 4.3.2-1i).
3. Volume 1, Page 4.3-22, third paragraph: The Master Project Drainage Study for Placer Vineyards and the draft EIR assert that the project will not increase the 100-year water surface elevations (WSEs) in Steelhead Creek. This finding

seems to contradict a previous analysis by SAFCA that predicts WSEs to increase by 1.2' upstream of the Steelhead (NEMDC) pump station for the future developed condition within Steelhead Creek Watershed. The Placer Vineyards – Steelhead Creek - Assessment of Potential Peak Flood Impacts Study, November 2005 by Civil Solutions initially indicated that the Placer Vineyards development would increase WSEs in Steelhead Creek by as much as 0.2' and that an additional 150 cfs pumping capacity at the Steelhead pump station would be required to mitigate the increased WSEs. Regardless of the findings reported in the draft EIR Sacramento County requires that development within the Steelhead Creek watershed contribute to the fair share stormwater volume mitigation fee (mitigation measure 4.3.2-1i) in order to address impacts from upstream development.

4. Volume 1, Page 4.2-22, Mitigation Measure 4.3.2-1a: Sacramento County requests the opportunity to review and comment to Placer County on site-specific project drainage reports that contain lands draining directly into Sacramento County. Drainage reports that include sheds EMD, EMFS, and EMG should be reviewed by Sacramento County and comments provided prior to approval by Placer County.
5. Volume 1, Page 4.3-24, Mitigation Measure 4.3.2-1i: The current fees cited in this mitigation measure are out of date. Since 1 April 2006, the revised fees range from \$259 to \$652 per acre, and as mentioned in the draft EIR will continue to be adjusted annually.

Please feel free to contact Mike Johnson or myself at (916)874-8651.

Sincerely,

Pete Hall
Associate Civil Engineer
hallp@saccounty.net

CC. George Booth, Mark Rains – Sacramento County Dept. of Water Resources
Steve Hong – Sacramento County Dept. of Engineering
Brian Keating – Placer County bkeating@placer.ca.gov
Pete Ghelfi – Sacramento Area Flood Control Agency

LETTER 4 PETE HALL, COUNTY OF SACRAMENTO DEPARTMENT OF WATER RESOURCES

Response 4A: Commenter states that Shed Maps prepared for both the Master Drainage Study for the Elverta Specific Plan, which borders Placer County, and the Master Project Drainage Study for Placer Vineyards conflict with each other. The Placer Vineyards shed map shows the area of Shed EMG within Placer Vineyards draining to Steelhead Creek; however, a portion of this shed area drains to a lake at Gibson Ranch Park that discharges to Dry Creek.

Civil Solutions has coordinated the watershed limits for the Elverta Specific Plan Area. Its engineers obtained detailed project topography for the Elverta Specific Plan area and re-cut watersheds within the Elverta Specific Plan area based on that topography. The County of Sacramento has also provided CESI with LIDAR topography for the unincorporated County of Sacramento areas. This topography is more detailed than the USGS Quadrangle based topography that was previously used to delineate off-site watersheds. Within the Placer Vineyards Specific Plan area, shed boundaries were previously based on detailed aerial topography mapping which is not in dispute. The revised watershed maps closely match the Elverta Specific Plan watersheds for areas within the Elverta Specific Plan area. The LIDAR topography identified a shed change. Previously the Placer Vineyards Specific Plan EMG watershed drained towards the NEMDC (Steelhead Creek). The topography does indicate that the flow paths previously reported in the Placer Vineyards Specific Plan study were in error. The LIDAR topography identifies this area as being directly tributary to Dry Creek, via the lake at Gibson Ranch. Therefore, the Master Project Drainage Study has been updated as described in the following paragraph excerpted from the Study:

In August of 2006, this study was revised in response to comments from Sacramento County Department of Water Resources. The comments from Sacramento County requested that the project watershed delineations for the Placer Vineyards project offsite, match the Elverta Specific Plan, and that the Elverta Specific Plan offsite sheds match the Placer Vineyards Project areas. We obtained digital shed maps and topographic maps for the Elverta Plan area, and modified the Placer Vineyards Hydrology for the corrected offsite watershed delineations. The most significant change occurs at the EMGS24B shed area which was found to be tributary to Dry Creek via the Gibson Park Lake. The changes also affect the analysis of Steelhead Creek Flood elevations and flowrates. The changes of this revision did not modify the relative impact of the project at Steelhead Creek and Curry Creek. The EMGS24B watershed change modifies the Dry Creek hydrology and is discussed in the Dry Creek section of this document.

Based on the revised Master Project Drainage Study, Table 4.3-3 of the Revised Draft EIR is modified as follows:

Revised Table 4.3-3 Dry Creek Outflows	
Model	Peak Flowrate (cfs)
PCFCWCD (provided base model)	15,595
Corrected Effective Model	15,598 <u>15,625</u>
Post-Project Unmitigated	15,605 <u>15,621</u>
Post-Project Mitigated	15,618 <u>15,633</u>

As can be seen from Table 4.3-3, volumes within Dry Creek increased slightly under the revised analysis; however, increases are minor and do not alter the conclusions contained in the Revised Draft EIR, which found the direct project impact to be insignificant. However, cumulative impacts to Dry Creek were found to be potentially significant and considerable. This conclusion is not altered by this minor increase in volume. Because flows were shifted to Dry Creek, flows within the Steelhead Creek watershed are reduced a small amount. The conclusion that impacts related to Steelhead Creek can be mitigated to a less than significant level is not altered by the slightly reduced flows. The commenter is referred to the Master Project Drainage Study revised August 6, 2006, for additional detail.

Commenter states that shed maps for the Elverta Specific Plan and Placer Vineyards Specific Plan need to be reconciled in order to properly identify and determine downstream impacts. The commenter is correct; however, the detailed Elverta Specific Plan topography indicates that additional shed breaks can be identified for the Placer Vineyards Specific Plan study. Civil Solutions has reconciled the shed maps and study parameters. Revised Draft EIR Figure 4.3-2 has been modified to reflect the additional information and is reprinted in Section Four of this Final EIR.

Response 4B: The commenter notes that the last paragraph on page 4.3-21 of the Revised Draft EIR is confusing because it includes discussion of Dry Creek as well as the NEMDC. The point is acknowledged and the paragraph is hereby divided and rewritten as follows:

For the Mitigated Analysis a 60 AF detention basin was used prior to discharge to Dry Creek. The increase in flows for the mitigated analysis compared to the corrected effective model is worse than the increase in flows for the unmitigated model. Since the above analysis was performed, the Sacramento County Department of Water Resources has written that "...the increased water surface elevations due to development in Placer Vineyards is essentially zero" (Booth, November 3, 2004). Therefore, detention is not recommended at Dry Creek for this project.

The Sacramento County Department of Water Resources ~~has, however,~~ also requested that the Placer Vineyards Specific Plan project "...pay a fair share volume mitigation fee as listed on the Fee Schedule for Zone 11C, Sheds Flowing to NEMDC Tributaries, updated annually." Fees currently range from \$259.00 per acre to \$625.00 per acre, depending on relative contribution to the impact.

Response 4C: Commenter states that the finding that the project will not increase the 100-year water surface elevation in Steelhead Creek seems to contradict a previous analysis by SAFCA that predicts WSE's to increase by 1.2' upstream of the Steelhead Creek (NEMDC) pump station for the future proposed condition within the Steelhead Creek Watershed. Commenter also questions previous work by Civil Solutions that drew different conclusions. Regardless of the findings reported in the Revised Draft EIR, Sacramento County requires that development within the Steelhead Creek watershed contribute to the fair share stormwater volume mitigation fee (per Mitigation Measure 4.3.2-1i) in order to address impacts from upstream development

Table IIG4 of the Master Project Drainage Study shows that the Placer Vineyards project would provide sufficient onsite detention such that no increases to water surface elevations would be expected within Steelhead Creek (NEMDC) upstream of the D15 pump station. For the Blueprint alternative, Table IIG4 shows that increases at Steelhead Creek were reported in the D15 pump station sump area for both the 100-year and 200-year analysis.

Civil Solutions contacted Mike Johnson of Sacramento County MSA DWR to request copies of the studies which predicted the 1.2' increase. Two memos were supplied (MBK dated January 6, 2003 and March 11, 2003) documenting the studies. The land use assumptions (what types of land uses were assumed or where the land uses were placed) were not clear from the memos; however, the memos do suggest that in addition to the land use changes, a large contributing factor to the predicted increase in runoff volumes is a net increase in watershed area of 1.18 square miles. The memos do not indicate where this additional area comes from. The Placer Vineyards Master Project Drainage Study Table IIC2 indicates the net change as a result of the Placer Vineyards project would be an increase by 0.03 square miles. Based on the available information, no further response is possible.

The commenter is correct that some of the previous conclusions have changed. The November 2005 memo was based on a previous hydrology model for the Placer Vineyards Specific Plan project. Between November and the March release date for the Master Project Drainage Study, additional attenuation facilities were added to the project, which mitigated the impacts previously reported. The Master Project Drainage Study for the Placer Vineyards project accurately identifies the project impacts, and the mitigation measures necessary for the project.

The project is committed to participating in the "fair share stormwater volume mitigation fee" for Steelhead Creek per Revised Draft EIR Mitigation Measure 4.3.2-1i.

Response 4D: The commenter requests the opportunity to review and comment on future site-specific projects that may contribute runoff to Sacramento County. The request is acknowledged. The County will keep adjacent jurisdictions informed as specific projects are proposed. The comment does not raise an environmental concern that requires a further response.

Response 4E: The commenter reports that Sacramento County has adjusted its fair share stormwater volume mitigation fees since publication of the Revised Draft EIR. The information is acknowledged. Mitigation Measure 4.3.2-1i is hereby amended to read as follows:

New development in the Specific Plan area within the Steelhead Creek (NEMDC) tributary shall be subject to payment of fair share stormwater volume mitigation fees to the County of Sacramento. The current fees range from \$259.00 ~~325.00~~ to \$652.00 ~~629.00~~ per acre. (Fee Schedule for Zone 11C) and are adjusted annually. The actual fees to be paid will be those in effect at the time the payment occurs. Prior to improvement plan approval, the applicant shall provide evidence to the Placer County Department of Public Works that the fees have been paid to Sacramento County.

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

California Highway Patrol
9440 Indian Hill Road
Newcastle, CA 95658
(916) 663-3344
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)



April 28, 2006

RECEIVED
MAY - 5 2006
PLACER COUNTY DEPT

File No.: 220.10284.8837.SCH#1999062020

Ms. Lori Lawrence
Placer County Planning Department
11414 B Street
Auburn, CA 95603

Dear Ms. Lawrence:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Revised Draft Environmental Impact Report (RDEIR) for the Placer Vineyards Specific Plan SCH#1999062020. We believe the growth discussed will impact the mission of the CHP of providing safety and service of the public as they use the highway transportation system within Placer County. The project as outlined in the RDEIR, will substantially increase traffic volume and impact the State highways and roadways within the western portion of the Placer County, primarily Interstate 80 (I-80), State Route 65 (SR 65) and Baseline Road.

The effect this project will have over the Auburn CHP Area could be significant in the sheer magnitude of residents it will attract. The proposed Plan encompasses approximately 5,230 acres currently in the unincorporated area of Placer County. The plan calls for a maximum of 14,132 residential units. Additionally, approximately 7,594 jobs will be created within the proposed project. The additional daily trips traveled by these new residents and employees will generate will further strain SR 65, I-80, Watt Avenue and Baseline Road.

Given the current budget crisis the State of California is experiencing, there are no immediate plans to augment the workforce in the Auburn Area CHP Office nor are there any major projects to significantly increase the traffic capacity of I-80 or SR 65. This is an area that should be discussed as this project, along with several other major developments within the immediate vicinity, will have a major impact on traffic and as a result, all the residents in western Placer County.

State Route 65, which is located on the north edge of Roseville, has already experienced a major increase in usage due to the Galleria Mall opening, the growth from the cities of Lincoln, Roseville, and Rocklin. The opening of the Thunder Valley Casino in June 2003 has further impacted traffic along this major route and I-80.

Ms. Lori Lawrence

Page 2

April 28, 2006

Interstate 80, which bisects the City of Roseville, is currently operating at near maximum capacity. During certain times of the day, Interstate 80 is beyond capacity resulting in gridlock or near gridlock as traffic flows at a seriously reduced speed in both directions. This gridlock and congestion increases the potential for additional collisions. Any significant increase in growth will further affect this major Interstate.

The anticipated build out of the Plan Area is expected to occur over a period of 20 years, however if the continued trend of rapid growth in Placer County continues, culmination could be several years earlier. Using Stanford Ranch in Rocklin as an example; Stanford Ranch was scheduled for completion in 2008 yet in 2003 all building permits have been issued, five years ahead of projection. The dilemma that could be encountered is that the surrounding major roadways such as S.R. 65, I-80 and Baseline Road will be completely unable to handle the growth. While there is discussion within the RDEIR regarding improvements to surface streets such as Watt Avenue, Baseline Road and Dry Creek Road and others, it is our recommendation that much of the improvements be implemented prior to any major construction occurs.

We thank you for allowing our comments regarding the Revised Draft Environmental Impact Report. Through cooperative partnerships with local, county and State entities the CHP will continue to monitor the growth within western Placer County and the surrounding cities for its impact on the CHP's mission.

Sincerely,



RICK WARD, Captain
Commander
Auburn Area

cc: Assistant Chief Sal Segura, Valley Division
Captain Joe Whiteford, Special Projects Section

LETTER 5 RICK WARD, DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

Response 5A: The increase in traffic on State highways is discussed in Impacts 4.7-9 and 4.7-19 on pages 4.7-51 through 4.7-54 and 4.7-85 through 4.7-88 of the Revised Draft EIR. As stated in the comment, the proposed project would contribute to traffic congestion on these roadways (see Tables 4.7-24 and 39). Congestion will also increase as the result of other development in the region. The project contribution to the State highways is relatively low (less than 7 percent on segments operating at unacceptable levels). Nonetheless, Mitigation Measure 4.7-2 calls for project developers to contribute their fair share toward the funding of improvements on State highways, if and when the County enters into an agreement with Caltrans for such funding. Mitigation Measures 4.7-9b and 4.7-19b identify the highway improvements that would be needed to offset the project contribution to highway congestion. These improvements would relieve congestion associated with new development, so that the Highway Patrol is able to travel more efficiently. Also, see Response to Comment 43A.

From: Paul Thompson
To: jimkcoinmach@earthlink.net
Date: 5/4/2006 6:35:53 PM
Subject: Fwd: Placer Vineyards Specific Plan and the Special Planning Area (SPA)

Jim - Thank you for your comments on this project. I will make sure that they are forwarded to the Planning Commission. Regarding these comments, if you would like to meet to discuss these issues, I would be happy to do so. Please give me a call (530) 886-3044 at your earliest convenience.

Thanks,
Paul

>>> Lori Lawrence 05/02/06 8:16 AM >>>
Can you respond to this?

>>> "Jim Ketcherside" <jimkcoinmach@earthlink.net> 5/1/2006 8:04 PM >>>

We are landowners in the SPA area of Placer Vineyards Specific Plan area located at 9240 El Verano Ave., Elverta, 95626. This 5 acre parcel is currently zoned AR5.

After reviewing the Placer Vineyards Specific Plan and Special Planning Area (SPA) release dated April 24, 2006, it is our understanding that there will be 198 new units available for future SPA planning. In light of this release, we are respectfully requesting consideration from Placer County Planning Department the following:

- 1) the aforementioned property be rezoned to AR3-AR1-AR1 or a AR3-AR2.

The adjoining property owners to our immediate north (currently zoned AR5) are also interested in the same rezoning configuration.

With this being said, how do we begin the the process of splitting and developing our properties? Any guidance you can provide would be most appreciated.

We are gravely concerned that the density rights that should have been allowed us have somehow been overlooked.

As we are not available to attend the public hearing scheduled on Thursday, May 11, 2006 at 10:45 a.m. before the Planning Commission, we are submitting this email as an official request to be submitted to the Planning Commission in lieu of our attendance at the meeting.

If you should have any questions regarding this information, please feel free to contact me at your first opportunity. Please respond to the email address below; or in writing to 9240 El Verano Avenue, Elverta, CA 95626; or I can be reached at (916) 991-5355 or (916) 261-2002. Thank you in advance for your reply.

Respectfully,

James Ketcherside
landowner
jimkcoinmach@earthlink.net
EarthLink Revolves Around You.

CC: Lori Lawrence; Terry Bennett

LETTER 6 JAMES KETCHERSIDE, LANDOWNER

Response 6A: The commenter correctly states that 198 new units will be available for future SPA area planning under the proposed project; however, the property which the commenter is discussing is zoned Residential - Agricultural, 10 acre minimum building site (RA-B-X-DR 10 acre minimum). As discussed in Sections 2.5, 3.1 and 4.1 of the Revised Draft EIR, development rights for properties within the SPA area will not change as a result of the proposed project. Property owners within the SPA area will be permitted to develop their property using large-lot rural residential development, consistent with current zoning at densities permitted by current zoning.

The County's General Plan specifically assigned a maximum of 14,132 residential dwelling units to the "West Placer Specific Plan area" (including the SPA). The Placer Vineyards Specific Plan proposes to utilize 13,721 of those units within the proposed mixed-use community. The remaining units would be available for properties in the SPA area (for a total of 411 SPA units) and could develop at a density of 10 acres per unit, or at a greater density with public water and sewer connections. Under the proposed Placer Vineyards Specific Plan, these units have not been assigned to specific parcels within the SPA area, and it is anticipated that these units would be separately planned in a future specific plan effort or amendment to the Placer Vineyards Specific Plan (if approved). It should be noted that further environmental review would be required for any development proposed in the SPA.

County of Placer
WEST PLACER MUNICIPAL ADVISORY COUNCIL
P.O. BOX 1466
ROSEVILLE, CA 95678



May 8, 2006
Placer County Planning Commission
11414 B Avenue
Auburn, Ca. 95603

Ref: Comments related to the Draft EIR for Placer Vineyards Specific Plan
Paul Thompson, Placer County Planning Department

Dear Planning Commissioners:

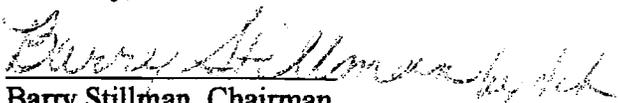
The West Placer Municipal Advisory Council, at a regular meeting on Weds., May 3, 2006, chose to make the following comments regarding the Placer Vineyards Specific Plan Draft EIR.

The Council is greatly concerned with the compliance of the proposed specific plan with the Dry Creek – West Placer Community Plan adopted in 1990. The Council is also concerned that the Draft EIR does not adequately address or provide for acceptable mitigation for the issues that follow:

- The use of buffer zones between existing residences and roadways
- The impact of sound from new development and increased traffic
- The need for a traffic impact analysis on interior Dry Creek roads such as Vineyard, Crowder, PFE, Cook Riolo Rd. etc.
- The need for assessment of the potential traffic increases if a decrease of 5% of Specific Plan jobs occurs or if the SACOG Blueprint plan of 21,000 units is adopted.
- The need for analysis of compatibility of land use (example: horse property backed up to professional buildings).
- The number of allowable units in the SPA area of equal available development units. (% of acres = % of density units allowable). For clarification the number of development units should be equally distributed on the entire acreage and infrastructure should be sized for such even though the SPA area is not looking to develop at this time.
- The issue of need for surface water (other than groundwater) to complete the project.
- The issue of "recycled water" demand (parks) exceeds availability—additional analysis of recycled water/surface water needed to address this issue.
- The EIR does not address a phasing schedule for the build out of the Specific Plan which would be helpful in future analysis of major issues.

Thank you for your time and consideration of each of these issues.

Sincerely,


Barry Stillman, Chairman
West Placer Municipal Advisory Council

LETTER 7 BARRY STILLMAN, CHAIRMAN, WEST PLACER MUNICIPAL ADVISORY COUNCIL

Response 7A: The commenter is concerned with the project’s compliance with the Dry Creek-West Placer Community Plan. The comment does not raise an environmental concern that requires a response in the EIR; however, the commenter is referred to Response to Comment 10B where this policy concern is addressed.

Response 7B: The commenter states that the Revised Draft EIR does not adequately address or provide acceptable mitigation for the use of buffers between existing residences and roadways. As the Revised Draft EIR states, the Placer Vineyards Specific Plan proposes an amendment to the *Placer County General Plan* related to land use buffers (Revised Draft EIR, pages 3.2 and 4.1-10). The General Plan would be amended to allow buffer zone standards that are different than those established by the General Plan to be established as part of Specific Plan approval. As the General Plan currently provides, “the exact dimensions of the buffer zones and specific uses allowed in buffer zones will be determined through the County’s specific plan, land use permit, and/or subdivision review process . . .” (*Ibid*). All buffers within the Specific Plan area would conform with Placer County General Plan standards, except as provided as part of Specific Plan approval.

Notably, the Specific Plan contains policies intended to avoid conflicts between land uses. For example, Specific Plan Policy 3.1 provides that “[t]he Placer Vineyards Plan Area shall be buffered from existing rural and agricultural development as long as this use persists. Buffers may include road right of way, landscaped setbacks and open space” (Revised Draft EIR, page 4.1-22). As discussed in the Revised Draft EIR, the Placer County General Plan requires buffers to “separate residential land uses from areas designated Business Park/Industrial where noise from vehicles and equipment . . . truck traffic, and otherwise heavy traffic volumes would be incompatible with nearby residential uses” (Revised Draft EIR, page 4.1-35). Such buffers “shall be a minimum width of three hundred feet, but may be reduced to not less than one hundred feet where the buffer includes such features as screening walls, landscaped berms, and/or dense landscaping . . .” (Revised Draft EIR pages 4.1-35 to 4.1-36).

Buffer widths proposed in the Specific Plan vary and are scaled to respond to the characteristics of the adjacent land uses. Site design techniques, described in Policy 3.29, to provide separation from adjoining uses include landscape corridors, trails, roadway widths, building setbacks, open space uses and stepped down densities of residential land uses approaching or adjoining agricultural uses. Specific Plan Policy 7.16 and Figure 7.10 (SPA Open Space Buffers diagram) describe the lotting and buffer design treatment adjacent to the Special Planning Area.

The project proposes a minimum 50’ buffer surrounding the existing residences in the Special Planning Area (SPA). A 50’ buffer is applied adjacent to the Riego area, which has the highest concentration of development in the SPA. Greater setbacks are provided especially adjacent to large lot parcels in the SPA. The plan also requires careful site design to provide adequate buffers for existing development. See Figure 4.2-6 of the Revised Draft EIR for the proposed buffers surrounding existing residential uses and roadways. A 200’ building separation requirement will be established from the northern right-of-way line on Baseline Road to provide a separation from lands in agricultural preserve, north of Baseline Road. A 200’ buffer is also

provided adjacent to the Placer County line along the Elverta Specific Plan area to buffer Agricultural Residential lots proposed for the area.

Although the Specific Plan describes various buffering concepts, it may not achieve the level of buffering envisioned by Exhibit 1 of the Community Plan, which emphasizes the need to establish buffers between the Specific Plan area and other uses, and between uses within the Specific Plan area (Revised Draft EIR, page 4.1-48). This is not an issue that must be resolved in a Revised Draft EIR; rather, this is a policy decision that would ultimately be made by the Board of Supervisors, after considering relevant input from all commenters.

As noted in the discussion of Impact 4.1-9 in the Revised Draft EIR, the minimum standards reflected in Table 1-4 of the Revised Draft EIR, and Figures 1-2 through 1-6 of the *Placer County General Plan* have not always proved compatible or workable in each situation (Revised Draft EIR, page 4.1-59). The Specific Plan proposes to amend the General Plan to permit the County to establish buffers that are specific and unique to the project under construction. This exception would only apply when a specific plan is proposed, and subsequently adopted by the Board of Supervisors. Because adoption of a specific plan is a discretionary action requiring a full CEQA-related environmental review, any specific proposals would be assessed for their environmental effects at the point a specific plan application is submitted (*Ibid*).

Response 7C: The commenter states that the Revised Draft EIR does not adequately address or provide acceptable mitigation for the impact of sound from new development and increased traffic. Section 4.9 of the Revised Draft EIR provides a full analysis of noise impacts related to transportation and non-transportation sources. Impacts related to aircraft, project generated traffic, and project construction are discussed in detail and the cumulative effects of the project and other activity in western Placer County are addressed. Three mitigation measures are proposed (Mitigation Measures 4.9-2, 4.9-3 and 4.9-4) to reduce noise-related impacts, where feasible, to a less than significant level. In addition, this Final EIR contains supplemental analysis of noise related impacts based on comments received and additional traffic analysis performed since the Revised Draft EIR was published. See Response to Comment 29D for revised tables reporting the traffic-related noise effects of the project. Several additional roadway segments have been reported that may be of interest to the commenter; however, the overall conclusions of the Revised Draft EIR are not changed. The commenter provides no examples of inadequacies in the noise analysis and mitigation measures contained in the Revised Draft EIR and provides no new information on which to base additional analysis; therefore, it is not possible to provide a more specific response to the commenter's concerns.

Response 7D: The commenter states that the Revised Draft EIR does not provide traffic analysis for Dry Creek area roads. Additional analysis was conducted by the County to characterize the project impacts on roadways in the Dry Creek area that could be substantially affected by the project. As a result, in August 2006 the County recirculated portions of the Revised Draft EIR to address the concerns of the commenter. The commenter is referred to the Partially Recirculated Revised Draft EIR for the requested analysis and conclusions.

Response 7E: The commenter states that the Revised Draft EIR does not assess traffic impacts related to the relative reduction in jobs under the Blueprint Alternative. The Revised Draft EIR

traffic analysis is based on the land use plan proposed in the Draft Specific Plan, as revised, and general assumptions about, among other things, the amount of square footage that would be developed in the non-residential land use categories. The factors used to estimate trip generation are shown in Table 4.7-14 on page 4.7-31 of the Revised Draft EIR. The non-residential factors are averages, with the expectation that some uses would be higher and some would be lower. As shown in the table, commercial and retail uses account for less than half of all trips. A five percent reduction in these uses would not substantially alter the conclusions of the traffic analysis. Any reduction in employment would generally reduce traffic impacts, because people would not be driving to those jobs. This effect would be offset in part by the redistribution of trips to other employment sites.

The traffic impacts of the Blueprint Alternative are addressed on pages 6-72 through 6-115 of the Revised Draft EIR.

Response 7F: The commenter states that the Revised Draft EIR needs an analysis of compatibility of land use and describes the example of horses adjacent to professional buildings. The Revised Draft EIR does contain an analysis of land use compatibility and includes several impact statements related to the subject, including Impact 4.1-5 (Incompatible uses and/or creation of land use conflicts could occur within the Specific Plan area) and 4.1-7 (Land use conflicts could occur within and adjacent to the Specific Plan area between agricultural uses and proposed development). Horses and other livestock fall within the meaning of “agricultural uses” and are addressed under current General Plan policies, which require a 50-foot residential exclusion area and a 50 to 200 foot buffer for other uses adjacent to livestock pasture (Revised Draft EIR page 4.1-35). The Revised Draft EIR reports on page 4.1-57 that “...Specific Plan policies have been proposed that meet the standards prescribed by the General Plan.” Based on this conclusion, impacts related to land use conflicts with agricultural uses were found to be less than significant. Also, see Responses to Comments 7B and 23B.

Response 7G: The commenter states that the total number of units allowed within the West Placer Specific Plan area (14,132) should be distributed on a spatially even basis throughout the area and the infrastructure sized accordingly. The proposed project allocates 13,721 units to the Placer Vineyards Specific Plan area, and 411 to the Special Planning Area (the "SPA"). The proposed allocation of units is based upon the development plan submitted by the project proponents, and allows for additional development in the SPA, although not at the same densities as proposed for the Placer Vineyards Specific Plan area. The infrastructure as proposed by the project proponent accommodates the total number of units allowed under Resolution 94-238 and the environmental document considers the impacts of development within both the PVSP and the SPA.

Response 7H: The commenter states that the Revised Draft EIR does not adequately address or provide acceptable mitigation for the need for surface water to complete the project. The Revised Draft EIR contains an extensive analysis of surface water and the adequacy of the surface water supply. Revised Draft EIR Section 4.3.3 (Water Resources) beginning on page 4.3-34 is devoted in large part to the subject of surface water supply, including regional and Statewide implications. Section 4.11.7 of the Revised Draft EIR beginning on page 4.11-57 discusses more localized surface water issues, including a description of PCWA water sources

and delivery systems, and the project's proposed water supply. On page 4.11-80, the Revised Draft EIR concludes that the PCWA has sufficient water supply to serve the project, but reports that there is insufficient infrastructure to convey and treat the water. In order to ensure that development does not occur prior to creation of adequate infrastructure capacity, the Revised Draft EIR includes Mitigation Measures 4.11.7-1a, b, and c, that require a demonstration that the necessary water delivery systems are in place before development may proceed. Because the commenter's concerns are general in nature, it is not possible to provide a more specific response. Also see Response to Comment 15N.

Response 7I: The commenter states that the Revised Draft EIR does not adequately address or provide acceptable mitigation for the issue of recycled water demand for parks. On pages 4.11-92 and 4.11-93, the Revised Draft EIR reports that the project could receive less recycled water than average annual day recycled water demand and concludes that this is a significant and unavoidable impact. This conclusion was reached based on the City of Roseville's current recycled water supply formula, as discussed on Revised Draft EIR pages 4.11-92 and 4.11-93.

Since preparation of the Revised Draft EIR, a Recycled Water Master Plan (August 2006) has been completed for the Specific Plan and Blueprint Alternative, and the applicants have proposed a method to ensure an adequate water supply for park irrigation needs. The City of Roseville (Brian Buchanan. pers. Comm., Jim Crowley, June, 2006) confirmed its intent to guarantee a supply of recycled water equal to the amount of wastewater received from the project. If excess recycled water is available from the City it can be provided to the project to fully supply the irrigation demand.

In the event excess recycled water is not available, the irrigation demand will be met with potable water. According to the Specific Plan Recycled Water Master Plan, this increases the need for potable water for the proposed project by 0.7 MGD in a maximum day and 112 AFA. For the Blueprint Alternative this increases the need for potable water by 0.2 MGD on a maximum day and 19 AFA. These potential additional demands on the potable system are well within the capability of PCWA to deliver because, upon completion of the Sacramento River Diversion Supply Project, PCWA will have significant uncommitted capacity. Because the water supply analysis performed for the Specific Plan and Blueprint Alternative assumed a Sacramento River diversion of 35,000 AFA (see Revised Draft EIR page 4.3-59), the maximum AFA utilization for landscape irrigation (112 AFA) when combined with other project demand (11,500 AFA + 112 = 11,612 AFA) is well within the potential diversion assessed in the Revised Draft EIR. For the Blueprint Alternative, potable water use could increase a very minor amount from 14,453 AFA to 14,472 AFA.

The Recycled Water Master Plans and the applicants' current proposal for recycled water use are described and analyzed in more detail under Response to Comment 29Y where a "semi-aggressive" option is also discussed. For analytical purposes, the above discussion stresses the "base demand," which is the more conservative approach, i.e., more potable water would ultimately be used under the base demand. The semi aggressive approach would rely more heavily on recycled water, reducing overall potable water demand.

Response 7j: The commenter states that the Revised Draft EIR “does not address a phasing schedule for the build out of the Specific Plan which would be helpful in future analysis of major issues.” Although the meaning of the commenter’s reference to “major issues” is unclear, the comment accurately notes that the Revised Draft EIR eliminated separate analysis of “Phase 1,” which was analyzed in the original Draft EIR. The Revised Draft EIR includes a single project-level analysis for the entire Specific Plan area. The prior format had differentiated between the impacts of Phase 1 and the impacts of the entire Specific Plan. These two separate analytical categories have been eliminated (Revised Draft EIR, page 1-1).

Exhibit 1 to the *Dry Creek/West Placer Community Plan*, adopted at the time the Board of Supervisors approved the 1994 General Plan, requires that development shall be phased in order to “maintain a balanced mix of land uses throughout development of the Specific Plan area and shall address necessary infrastructure and other relevant issues” (Revised Draft EIR, page 4.1-39). The Community Plan also provides that “[d]evelopment in the West Placer Specific Plan area shall be required to proceed in a logical fashion” (*Ibid*).

Although the proposed Specific Plan does not propose a phasing plan, Figure 3-15 in Chapter Three of the Revised Draft EIR shows conceptual 2015 land absorption assumptions (initial phase of development) that have been used during preparation of the Revised Draft EIR. The land absorption assumptions appear to generally attain the balanced mix of the land uses goal through inclusion of the Town Center. The initial development appears to be linear in nature, being spread out along major internal roadways. As noted in the Revised Draft EIR, the phasing of development of the Specific Plan does not appear to constitute a land use-related physical impact on the environment (Revised Draft EIR, page 4.1-47). Draft Financing Plans for both the Specific Plan and the Blueprint Alternative were made available for public review in the Partially Recirculated Revised Draft EIR issued in August 2006. These documents address the financial viability of the project proponents’ intended development scenarios.



Larry Greene
AIR POLLUTION CONTROL OFFICER

May 22, 2005

Lori Lawrence
Placer County Community Development Resource Agency
Environmental Coordination Services
11414 "B" Avenue
Auburn, CA 95603

**SUBJECT: Placer Vineyards Specific Plan Revised Draft EIR
SMAQMD # 200600960**

Dear Ms. Lawrence:

Thank you for providing the project listed above to the Sacramento Metropolitan Air Quality Management District (District). Staff comments follow.

- 1. When additional projects are planned and built in the larger project area, it is important to ensure excellent connectivity between developments, particularly for bicycles and pedestrians to residential areas and other commercial uses. | A
- 2. Implement all air quality mitigation, including the Air Quality Plan from Table S1, section 4.8, as outlined in chapter 1 of revised draft EIR. | B
- 3. SMAQMD supports the inclusion of a network of transit, bicycle and pedestrian facilities to reduce reliance on motor vehicles. | C

Please contact me with any questions regarding these comments at jhurley@airquality.org or 916-874-2694.

Sincerely,

Joseph Hurley
Assistant Air Quality Analyst

CC: Larry Robinson, SMAQMD

RECEIVED
MAY 24 2005

PLANNING DEPT.

LETTER 8 JOSEPH HURLEY, SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Response 8A: The commenter wishes to ensure connectivity between future developments. The Specific Plan proposes to provide a system of on-street bikeways, off-street bicycle/pedestrian trails, equestrian linkages, and street side pedestrian walkways. The project also proposes to provide connectivity to the regional trails system, including connection to Sacramento County. Circulation, including bicycle/pedestrian connectivity, is address in Section 4.7 of the Revised Draft EIR and the Specific Plan.

Response 8B: The commenter requests that the air quality mitigation set forth in the Revised Draft EIR be implemented. A Mitigation Monitoring and Reporting Program will be adopted by the Board of Supervisors, if the project is approved. The program will ensure that all adopted mitigation identified in the Revised Draft EIR, including mitigations designed to reduce air quality impacts, will be implemented.

Response 8C: The commenter supports the inclusion of transit, bicycle and pedestrian facilities to reduce reliance on motor vehicles. The comment is noted. As described in Response to Comment 8A, a network of bicycle and pedestrian facilities is planned. Provisions for transit are described on page 3-22 of the Revised Draft EIR and on Revised Draft EIR Figures 3-12 and 3-13.

County Executive
Terry Schutten



Sacramento International Airport
Mather Airport
Executive Airport
Franklin Field

Sacramento County
Airport System
G. Hardy Acree, Director of Airports

County of Sacramento

May 9, 2006

Lori Lawrence
Placer County Community Development Resource Agency
Environmental Coordination Services
11414 B Avenue
Auburn, CA 95603

RE: Comments on Revised Draft EIR on the Placer Vineyards Specific Plan, PEIR-T200540651, SCH #1999062020

Dear Ms. Lawrence:

The Sacramento County Airport System (Airport System) appreciates the opportunity to provide comment on the Revised Draft EIR on the Placer Vineyards Specific Plan. The proposed development is consistent with the proposed Theoretic Capacity Noise Contour for McClellan Air Field which has been forwarded to the Sacramento Area Council of Governments for the purposes of updating the Airport Land Use Compatibility Plan in that the residential development is outside the 60 CNEL (Community Noise Equivalent Level). However, this area would be subject to frequent large aircraft (over 75,000 pounds) from McClellan Air Field operating over the area under 3,000 feet Above Ground Level.

Based on current and historical experience, the Airport System's specific concern is related to single-event noise occurrences and the high probably of complaints from future homeowners in the Placer Vineyards residences due to aircraft overflights in the area.

Though the current version of the Draft EIR does acknowledge that the specific plan area is outside of the significant noise exposure area of McClellan Air Field, it does not adequately address the presence of large aircraft overflights or the magnitude of single aircraft noise events in the area. Approval of this project would facilitate residential and other noise-sensitive urban development below the flight tracks of aircraft using McClellan Air Field, resulting in potentially significant effects on human health and well-being including speech and sleep disturbance.

Over time, the number of aircraft overflying this site will increase as the McClellan Air Field continues to grow. The Federal Aviation Administration (FAA) has total control over aircraft departure routes. The Airport System is unaware of any FAA plans to alter these routes, and it is highly speculative that the FAA would alter these routes in the future.

Although aircraft manufacturers have significantly reduced the noise levels of new aircraft over the past 20 years and airlines work hard to reduce noise impacts, aircraft noise remains an unwanted byproduct of aircraft operations. The Airport System does its part to minimize aircraft noise by working with aircraft operators, air traffic controllers, and concerned citizens to ensure the airport operates in as quiet a manner as possible.

The Airport System recommends any Placer Vineyards approval action include the following conditions: A disclosure of aircraft overflight and noise impacts with the initial sale of homes; and, the execution of a similar disclosure which would attach to the property and remain in title with subsequent property transfers to ensure adequate disclosure of the potential single noise event impacts this area would receive.

Thank you for considering the Airport System's request and comments. If you should have any questions, please feel free to contact me at 874-0704.

Sincerely,



Monica R. Newhouse
Airport Noise Program Manager

Cc: Robert B. Leonard, Airport Chief Operating Officer - County Airport System
Leonard H. Takayama, Deputy Director - Planning and Development,

LETTER 9 MONICA NEWHOUSE, COUNTY OF SACRAMENTO AIRPORT SYSTEM

Response 9A: The commenter is concerned that the Revised Draft EIR does not adequately address large aircraft overflights or the magnitude of single aircraft noise events. Disclosures to future homeowners are recommended. Noise from aircraft is addressed by Impact 4.9-1 of the Revised Draft EIR, which concludes that the impact is less than significant. This conclusion is based on the most recent information available for McClellan Park, as reflected on Revised Draft EIR Figures 4.9-4 and 4.9-5. As shown on the figures, measurable aircraft noise levels will not exceed adopted noise standards within the Specific Plan area.

Little is known about the character and number of the future hypothetical single event flights referenced by Sacramento County. Placer County is aware of no data or other supporting documentation that quantifies or otherwise describes such flights, or that future flights such as those suggested will even occur. Without such data, it is not possible for Placer County to determine a meaningful threshold to establish level of significance. Placer County considers concerns about single-event noise exposures to be speculative in nature (see CEQA Guidelines Section 15145). Further, in the event that such flights were to occur, and as a result lead to significant effects on speech and sleep disturbance on residents in the Specific Plan area, the mitigation proposed by the commenter would not be effective. Human health and safety impacts from noise exposure (an environmental impact) cannot be addressed by disclosure of aircraft overflight during the home sales process. Such disclosures could be useful in avoiding complaints or lawsuits over aircraft noise, but would not mitigate a health and safety concern and would, therefore, be ineffective as mitigation for the hypothetical concern expressed by Sacramento County.

From: Paul Thompson
To: Lori Lawrence
Date: 5/9/2006 8:44:48 AM
Subject: Fwd: Community Plan Changes/Placer Vineyards Project

Please see comments below on the Revised DEIR for the Placer Vineyards Specific Plan.

Thanks,
Paul

>>> "Noe Fierros" <nfierros@surewest.net> 05/07/06 7:52 AM >>>

Paul,

I believe any changes to the community plan should be heard out at the MAC level and publicly noticed as changes to the Community Plan as opposed to being heard as part of the Placer Vineyards Specific Plan Area EIR/project. The reasoning behind this is that some residents may not be concerned with the Placer Vineyards project but may be concerned about changes to the Community Plan. If a separate hearing were held for the changes only some residents may be more apt to participate in the hearings. Including the changes in the Placer Vineyards project, in the volumes of documents, is in a sense 'hiding' the changes and coming in through the back door. I request specifically that changes to the Community Plan be heard by the MAC as such. Please accept this as a formal input to the Placer Vineyards EIR.

Respectfully
Noe Fierros

Noe Fierros

PLACER COUNTY
DATE RECEIVED

MAY 11 2006

PLANNING COMMISSION

From: <Terry.Roberts@OPR.CA.GOV>
To: <[REDACTED]>
Sent: Thursday, April 13, 2006 7:28 PM
Attach: Consistency between Community Plan and Specific Plan.doc
Subject: OPR Response to your question about Community and Specific Plans

Dear Mr. Fierros:

It was a pleasure meeting you last Saturday at the County Planning Commissioners conference. I apologize for taking so long to respond to your question but I have been on the road these past 3 days. You wanted to know whether there is a legal requirement for specific plans to be consistent with community plans. The attached document explains that although there is no explicit statutory requirement for these two types of plans to be consistent, there is substantial justification to interpret that they must be consistent with one another. Please let me know if you have trouble opening the attached WORD document.

<<Consistency between Community Plan and Specific Plan.doc>>

*Terry Roberts
Director, State Clearinghouse
Governor's Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044
Tel (916) 445-0613
Fax (916) 323-3018
Email terry.roberts@opr.ca.gov*

Consistency Between Community Plan and Specific Plan

State planning law (California Government Code) does not explicitly mandate that a specific plan be consistent with the relevant community plan. However, since both the community plan and the specific plan must be consistent with the general plan, by extension, they must also be consistent with one another.

Public Resources Code (PRC) section 21083.3 (e) defines a community plan as part of the general plan.

PRC 21083.3(e). As used in this section, "community plan" means a part of the general plan of a city or county which (1) applies to a defined geographic portion of the total area included in the general plan, (2) complies with Article 5 (commencing with Section 65300) of Chapter 3 of Division 1 of Title 7 of the Government Code by including or referencing each of the mandatory elements specified in Section 65302 of the Government Code, and (3) contains specific development policies adopted for the area included in the community plan and identifies measures to implement those policies, so that the policies which will apply to each parcel can be determined.

While not a part of the general plan, the specific plan is legally required to be consistent with the general plan. The specific plan is defined in the Government Code (GC)..

GC 65450. After the legislative body has adopted a general plan, the planning agency may, or if so directed by the legislative body, shall, prepare specific plans for the systematic implementation of the general plan for all or part of the area covered by the general plan.

GC 65454. No specific plan may be adopted or amended unless the proposed plan or amendment is consistent with the general plan.

GC section 65359 says that when a city or county amends its general plan, the city or county shall also amend any specific plan, or other plan, so that they are consistent with the general plan. This implies that a specific plan and a community plan must be consistent with one another, since they both must be consistent with the general plan.

GC 65359. Any specific plan or other plan of the city or county that is applicable to the same areas or matters affected by a general plan amendment shall be reviewed and amended as necessary to make the specific or other plan consistent with the general plan.

The following is an excerpt from the OPR *General Plan Guidelines* (at page 17) on this subject. You can view the *General Plan Guidelines* from the following web address: [http://www.opr.ca.gov/planning/PDFs/General Plan Guidelines 2003.pdf](http://www.opr.ca.gov/planning/PDFs/General%20Plan%20Guidelines%202003.pdf)

Area and community plans are part of the general plan. A specific plan, on the other hand, is a tool for implementing the general plan but is not part of the general plan. The following paragraphs look briefly at each of these types of plans.

“Area plan” and “community plan” are terms for plans that focus on a particular region or community within the overall general plan area. An area or community plan is adopted by resolution as an amendment to the general plan, in the manner set out in §65350, et seq. It refines the policies of the general plan as they apply to a smaller geographic area and is implemented by ordinances and other discretionary actions, such as zoning. The area or community plan process also provides a forum for resolving local conflicts. These plans are commonly used in large cities and counties where there are a variety of distinct communities or regions.

As discussed earlier, an area or community plan must be internally consistent with the general plan of which it is a part. To facilitate such consistency, the general plan should provide a policy framework for the detailed treatment of specific issues in the various area or community plans. Ideally, to simplify implementation, the area or community plans and the general plan should share a uniform format for land use categories, terminology, and diagrams.

Each area or community plan need not address all of the issues required by §65302 [this refers to the mandatory elements of a general plan] when the overall general plan satisfies these requirements. For example, an area or community plan need not discuss fire safety if the jurisdiction-wide plan adequately addresses the subject and the area or community plan is consistent with those policies and standards. Keep in mind that while an area or community plan may provide greater detail to policies affecting development in a defined area, adopting one or a series of such plans does not substitute for regular updates to the general plan. Many of the mandatory general plan issues are most effectively addressed on a jurisdiction-wide basis that ties together the policies of the individual area or community plans.

A specific plan is a hybrid that can combine policy statements with development regulations (§65450, et seq.). It is often used to address the development requirements for a single project such as urban infill or a planned community. As a result, its emphasis is on concrete standards and development criteria. Its text and diagrams will address the planning of necessary infrastructure and facilities, as well as land uses and open space. In addition, it will specify those programs and regulations necessary to finance infrastructure and public works projects. A specific plan may be adopted either by resolution, like a general plan, or by ordinance, like zoning.

Specific plans must be consistent with all facets of the general plan, including the policy statements. In turn, zoning, subdivisions, and public works projects must be consistent with the specific plan (§65455).

LETTER IO NOE FIERROS

Response IOA: The commenter suggests that a separate public hearing be held on the proposed amendment to the Dry Creek/West Placer Community Plan outside of the Placer Vineyards Specific Plan review process in order to provide an opportunity to review the community plan amendments. The County is interested in ensuring that residents of the Dry Creek/West Placer Community Plan area are provided sufficient opportunity to give input into both the amendments and the Specific Plan itself and will take this suggestion into consideration when scheduling hearings on the project. The Planning Department will coordinate the involvement of the Dry Creek/West Placer Municipal Advisory Committee prior to any action on the Specific Plan by the Planning Commission and the Board of Supervisors.

Response IOB: The commenter refers to the subject of consistency between a specific plan and a community plan. When the Dry Creek/West Placer Community Plan was adopted in 1990, a large portion of the area west of Dry Creek and Watt Avenue was retained in agricultural designation so that it could be the subject of further study and review as the County undertook a countywide update of the Placer County General Plan. After a lengthy public process, on August 16, 1994, the County adopted the Placer County General Plan Update and took several actions in conjunction therewith, including the adoption of Resolution 94-238 which included “Exhibit 1” (see General Plan Appendix D). Resolution 94-238, amended the Dry Creek/West Placer Community Plan to include the “West Placer Specific Plan Area” and established “standards for development in the specific plan area and changes to the text as well as amendment to all of the exhibits and the community plan land use diagram.” Exhibit 1 includes explicit development standards for the West Placer Specific Plan area, design elements for transit, urban design criteria (urban form, town center, village core area, public gathering areas, community open space areas, pedestrian-oriented design, commercial areas, residential areas, open space and roadway corridors), and special provisions covering phasing, agricultural water supply and noise. The intent of the special requirements set forth in Exhibit 1 is to provide for a comprehensive overall plan for the West Placer Specific Plan area and to apply planning criteria that are distinct and separate from the remainder of the Dry Creek/West Placer Community Plan and which supersedes the goals and policies of the Community Plan. As such, the County considers the Placer Vineyards Specific Plan subject to conformity only with the goals and policies of the Placer County General Plan and Exhibit 1. Substantial deference is afforded to the County in the application and interpretation of its own planning documents.

Bob Lundin
PO Box 1345
Loomis, 95650
(916) 652-4169

PLACER COUNTY
DATE RECEIVED
MAY 11 2006
PLANNING COMMISSION

May 9, 2006

Placer County Planning Department,

Re: Placer Vineyards

I have read with interest the proposed development for Western Placer County. I was on the Placer County Planning Commission when this issue came up in the early 90's and have the same reservations today as I had then. I have no basic objection to any of these projects provided the infrastructure is added at the same time as the projects are completed.

The main issue is traffic and how to get the residences of Placer Vineyards from their homes to the I-80 corridor - during rush hour and when they get onto I-80, how long will they be in heavy traffic. Also, once the Placer Vineyards is built, there will be pressure to develop the entire area into homes so future planning is needed.

Putting all that traffic onto Blue Oaks or Main Street is not acceptable. A new throughway is needed that does not include a multitude of stop lights that impede traffic. A plan will also be needed to widen SR65 and to add lanes to the intersection of SR65 and I-80 before the development is approved as well as widening I-80 to the Sacramento County Line.

For reference, our first home was in South San Jose. We moved in the early 1970's when there was not an easy way to get to Sunnyvale or Santa Clara. All we had were city streets which were clogged in rush hour traffic. At that time, the city or county or state had secured the right-of-way for Highway 85 that went from Cupertino to Gilroy and bypassed much of the local area streets. The freeway was finally built in the late 1990's and has relieved much of the local area traffic.

The same concept is needed here in Placer County. A right-of-way must be identified and set aside before more homes are built.

The traffic situation now is bad but with all the development in Placer County, it will just get worse. The congested roads can be fixed by requiring construction of roads or public transportation systems at the same time as development. I also believe that solving the transportation problem must be a joint effort with the development community and the county / city.

The same issues apply for schools, police (including sheriff & CHP) and fire protection issues that are creating with the new development.

The following is needed in the EIR:

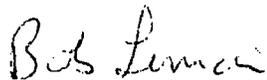
- a) A transportation plan for an expressway from Placer Vineyards to I-65 and US-99 / I-80.
- b) Identify funding for the expressway is identified.
- c) Include the impact of the added residences on the "bottle-neck" on I-80.
- d) Identify funding to eliminate the "bottle-neck".

Before the project is approved, several items must be addressed:

- 1) The project is approved only after funding is allocated for major thoroughfares and expressways to I-80 and US-99.
- 2) Building permits are issued only after the road work on the expressway and I-80 "bottle neck" fix has begun.
- 3) Take a serious look into extending a light rail system into Placer County. With the price of fuel, this should be a high priority to solve the congestion problem and air pollution problem. This is especially important now with gas prices increasing.
- 4) Allocate a right-of-way for light rail now that the land is bare.
- 5) Current residences of Placer County do not pay for this road work.

Thank you for considering my suggestions.

Sincerely,



Bob Lundin

Bob Lundin
PO Box 1345
Loomis, 95650
(916) 652-4169

May 13, 2006

Placer County Planning Department,

Re: Placer Vineyards

Please add these comments to my May 9 letter

(1) It is not clear if how home owners will get from the project site to I-80 or US-99 without going on city streets. This needs to be clear!

The EIR must identify the exact right-of-way from Placer Vineyards to I-80 and US-99 for an expressway in the specific plan. If the specific plan is to reference another county document, that is fine, as long as it is specified.

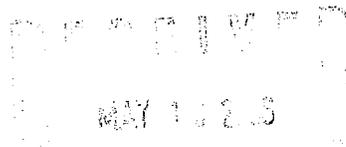
From my perspective, it is unacceptable to put that amount of traffic onto city streets. The draft EIR, section 4.7-2 states an increase in traffic is significant and unavoidable and that the LOS in the area will be rated F is also not acceptable.

(2) The effect of this project on CHP staffing and services provided to other parts of the county are not addressed in the EIR. Will other parts of the county have reduced services when this project is built?

Sincerely



Bob Lundin



LETTER II BOB LUNDIN

Response IIA: Commenter wants infrastructure added at the same time as projects are completed. As stated on page 3-34 of the Revised Draft EIR, the proposed project requires that backbone infrastructure (shown on Revised Draft EIR Figures 3-14, 3-16, 3-17A, 3-17B, 3-18 and 3-19) be constructed prior to or concurrent with development. This backbone infrastructure would be composed of collector and arterial streets and major pipelines. Streets and pipelines internal to each development would then connect to the backbone infrastructure.

Response IIB: Commenter is concerned about traffic and the need for additional roadways and road widening. The primary connection between the Plan Area and Interstate 80 is Watt Avenue. The proposed project includes the widening of Watt Avenue to four lanes as part of the backbone infrastructure improvements that would be constructed prior to or concurrent with project development (see Revised Draft EIR Figure 3-16). Ultimately, the proposed project would widen Watt Avenue to six lanes from Baseline Road south to the Placer County line. The Revised Draft EIR also identifies mitigation for Watt Avenue through Sacramento County and for Interstate 80 (see Mitigation Measures 4.7-5, 4.7-9, 4.7-15 and 4.7-19).

The County is involved in interagency transportation planning through the Placer County Transportation Planning Agency (PCPTA). PCPTA is responsible for funding certain regional transportation projects, such as Placer Parkway. The proposed project would pay fees toward PCPTA projects.

In addition, Mitigation Measure 4.7-2a calls for interagency agreements between Placer County and other affected jurisdictions (Sutter, Sacramento, Roseville and Caltrans). Under the mitigation, developers would pay fees based on their share of impact on roadways in other jurisdictions if and when the County and the affected jurisdiction entered into enforceable and (with the exception of Caltrans) reciprocal agreements. The Revised Draft EIR identifies the improvements that would be needed to reduce impacts in other jurisdictions. If agreements are entered into between the County and various jurisdictions, and the improvements are constructed, most roads and intersections are predicted to operate at acceptable service levels. However, in some cases, roads or intersections would continue to operate at unacceptable levels.

One of the projects being undertaken by PCPTA is Placer Parkway, which would provide an expressway between SR 65 and Highway 99. Placer Parkway is separate from the proposed project, but the proposed project would contribute fees toward the parkway if and when it is approved. PCPTA is currently preparing the environmental documentation for the parkway.

The proposed project does not provide right-of-way for light rail; however, as shown in Revised Draft EIR Figure 3-13 right of way is set aside for Bus Rapid Transit (BRT), which is currently viewed as the most feasible way to extend higher speed transit to the project area.

Current residents are not expected to pay for the proportion of roadway improvements that are attributable to the project.

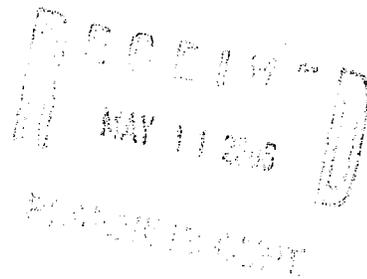
Response IIC: Commenter wants primary access to I-80 and SR-99 identified. The primary connections to Interstate 80 and Highway 99 are Watt Avenue and Baseline Road, respectively. The traffic model also distributes some trips on parallel facilities.

The Revised Draft EIR did not identify the need for an expressway through the project site. However, the proposed project would provide right-of-way and funding for the widening of Baseline Road and Watt Avenue, and would contribute fees toward the Placer Parkway, if and when that project is approved. These improvements would increase capacity on the primary routes to the state highways. In addition, Mitigation Measures 4.7-9 and 4.7-19 call for the widening of the highways under existing and cumulative conditions.

The comment that it is unacceptable to put the amount of traffic on city streets that would result from the project is noted.

Response IID: Commenter is concerned about project impacts on the Highway Patrol. Please see Response to Comment 5A.

May 10, 2005



**Placer County Planning Commission
Board of Supervisors**
11414 B Avenue
Auburn, CA 95603

Re: Placer Vineyard (PEIR T20040651/SCH #1999062020), Revised Draft Environmental Impact Report (EIR)

To the Board and Commission-

We are property and home owners in the adjoining or general area of this project (as know as the Special Planning Area or SPA). Since we are not able to attend public hearing on the Plan on May 11, 2006 at 10:45 a.m. we wish to you to add our written comments and concerns regarding the Plan and Project.

Quality of Life-

We moved to this area to enjoy a rural life style and the development of property to the density proposed will bring the end to our country life and "move" us into the urban city. We have horses, chickens, animals, gardens and a peaceful existing with our surroundings. Wild birds and animals run through open pastures. With development comes the end of much of our quality of life. As animals are pushed out of open areas the will attempt to relocate to adjacent properties, this will include rodents which will take up "home" in our homes, garages, barns, outbuildings and property. What will the developers do to mitigate these issues affecting the current property owners?

Water Availability-

Currently we obtain our water from underground wells and as this development comes into play, we believe our water will be affected. If water for the development is obtained from ground sources and wells, our current well levels will drop as the water table drops in response to additional usage. The purity and quality of our water will be affected by this development.

Sewer and Drainage and Flood Control-

During winter storms our roads flood and drain ditches over fill with storm water. As new development occurs more flood and low lying lands are covered and build up, this will cause more flooding than we currently experience in the area. The levy system is taxed in our current situation and we do not want to add more water to this under-maintained system. Adequate sewer system must be developed to handle this new development as currently property owners have no county maintained system, but use septic systems on there property. The current drain ditches need to be keep clean and maintained to mitigate floods situations.

Traffic and Safety-

We experience many accidents on the roads in our area and currently our fences and property is damaged as more people and cars at added going at a faster and faster speed there will be more accidents in our area. We request that the developers mitigate the traffic situation and all noise levels of new constructions areas along with the traffic. We wish to have speed bumps or traffic and speed mitigation to slow traffic on developed and exiting rods.

Property Protections and Services-

We do not have adequate police and fire protection to accommodate this development without increasing such services in our area. With new development we expect we will have more crime and the need for more police protection.

Schools and Libraries and Open Areas and Parks-

Our schools are older in the area and there are no libraries in the area, this development will need to accommodate such services to the area. As the Project includes parks and open areas, who will maintain these parkways, bikeways and open areas? Who will pay for the water, utilities and services required to maintain these areas?

Loss of Property through Right of Ways and Widening of Roads-

Improvements are proposed to widened Locust Road to County standards and add new roadways adjacent to existing property owners. We wish to know what is "County standards" and how much of our land would be taken from the existing property. We do not want our current property sizes reduced in order to wider roads. Even through the County would pay the property owner for the property acquired, our homes would be closer to roadways than the currently are situated. This would be not an acceptable situation as more road noise and threat to property would occur. If new roads are proposed these roads should not be taken from existing land owners not direct involved in the project. All road right of ways should be allocated from the developed property and not those not a party to the development. Property at 8450 Locust Road has buildings on the adjacent property lines and if roads are developed on the Project the property owner does not want there land taken with roadway essessment and buildings threatened or required to be relocated in this process.

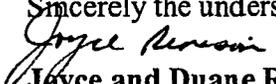
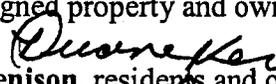
Expected Permits and Use-

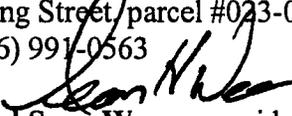
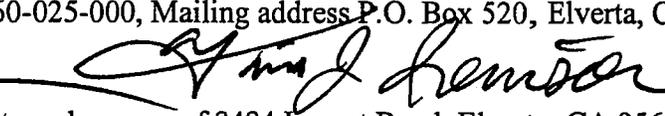
At 8450 Locust there is a family business ran through a Multiple Use Permit for a horse stable, will this development affect this business? With new urban development next to a horse stable, the new property owners will have complains regarding "city" folks moving to the country. We do not want a new development to push out the existing business and residents. We do not wish to have the higher density development as suggested in the alternate plan, as we believe more people pushed closer together next to rural property is not the best plan for our area.

Timeline and Notice-

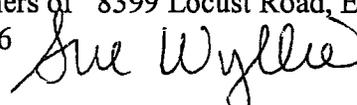
We would ask that you keep us advised of the timeline of this project and provide adequate notice of meetings and required filings. Most of the effected property owners in the area work during the day and do not live in Auburn, so meeting in our area and after work would be appreciated. Since we have not been allowed adequate time to research and obtain information regarding this development and the effects to the entire area and project, we have included our known issue. But we reserve the right to bring up additional issues and factors as they are revealed.

Sincerely the undersigned property and owners in the effected area-



Joyce and Duane Renison, residents and owners of 8450 Locust Road, Elverta, CA 95626, parcel #023-060-021-000 and 10355 Browing Street parcel #023-060-025-000, Mailing address P.O. Box 520, Elverta, CA 95626, Phone number (916) 991-0563



Tina Renison-Weaver and Sean Weaver, residents and owners of 8484 Locust Road, Elverta, CA 95626 Mailing address, P.O. Box 520, Elverta, CA 95626, Phone number (916) 991-5094

Sue and Walter Wyllie, residents and owners of 8399 Locust Road, Elverta, CA 95626, parcel # , mailing address, P.O. Box 1089, Elverta, CA 95626




LETTER I2 JOYCE AND DUANE RENISON, TINA RENISON-WEAVER AND SEAN WEAVER, AND SUE AND WALTER WYLLIE, PROPERTY OWNERS

Response I2A: The commenters live on Locust Road in a 979-acre area designated by the Specific Plan as a Special Planning Area (SPA) and are concerned about loss of quality of life. The Revised Draft EIR notes in Section 3.2.2 that a portion of the property owners in this area “have expressed a desire to maintain large parcels and a rural lifestyle.” Nothing in the proposed Specific Plan will preclude this. Under existing zoning, which cannot be changed without additional environmental review, only 63 new units can be built in the SPA. The 4,250-acre portion of the Specific Plan area east of the SPA is, however, proposed to be urbanized over a 20-year period, consistent with the Placer County General Plan, which has shown this area for urban development since 1994. The Specific Plan and Revised Draft EIR, however, contain a number of measures designed to protect the quality of life of existing SPA residents. For example, Impact 4.1-5 in the Revised Draft EIR discusses the potential for incompatible land uses and creation of land use conflicts. The discussion following Impact 4.1-5 contains the following:

...the Specific Plan contains a variety of techniques designed to ensure compatibility of uses and contains goals, policies and guidelines for this specific purpose such as: Goal 3.17 (Compatibility of adjoining land uses), Policy 3.29, (Compatibility of adjoining large lot rural and agricultural uses), Policy 3.30 (Compatibility of residential uses adjacent to commercial and employment uses), and the Design Guidelines included in Chapter VI of the Specific Plan. In addition, all proposed commercial and employment uses will be subject to Design Review, which will permit the County to review proposed uses for compatibility with adjacent existing and proposed land uses and impose compatibility requirements. Other sections of the Revised Draft EIR also contain discussions and proposed mitigation for potential incompatibilities. These include Mitigation Measure 4.2-6a related to alteration of views, Mitigation Measure 4.9-3 concerning control of stationary noise sources, and Mitigation Measure 4.9-4 designed to reduce traffic noise incompatibilities. Potential incompatibilities with the existing power line easements and substation within the Specific Plan area are also discussed under Impact 4.1-6 and agricultural conflicts are discussed under Impact 4.1-7. Light and glare from the County corporation yard and noise impacts related to the corporation yard and fire stations are discussed in Sections 4.2 and 4.9 of the Revised Draft EIR.

In summary, although the character of surrounding lands may change in a manner consistent with the adopted County General Plan, maintenance of existing lifestyle within the SPA is anticipated and provisions have been built into the Specific Plan and Revised Draft EIR to minimize intrusion from incompatible land uses and activities.

Response I2B: The commenters are concerned about potential impacts to existing water supply. In the near-term and long-term, the primary water supply for the project would be a surface water supply from PCWA. PCWA is, however, proposing that a backup groundwater component be developed in conjunction with the Specific Plan (PCWA Water Supply

Assessment, Appendix M of the Revised Draft EIR) to supplement surface water supply in dry years. These supplies are discussed in detail in Section 4.3 of the Revised Draft EIR. Potential effects on the North American River groundwater subbasin are addressed under Impact 4.4.3-7 in the Draft EIR. Potential effects on existing wells in the Specific Plan Area from any new wells drilled on site are addressed under Impact 4.4.3-8. Mitigation Measures 4.3.3-8a, b, and c have been proposed to ensure that existing wells are protected, including a Well Insurance Program as described on page 4.3-82 of the Revised Draft EIR. Although the commenter claims that the purity and quality of their water would be affected, no evidence or data is provided to support this claim. The proposed project will, in fact, extend a public water system to the Specific Plan area. This water supply will be available to residents of the SPA and could be accessed by them to replace substandard or failing systems within the SPA. For wells that will continue to be used in the SPA, Mitigation Measure 4.3.4-4 provides that any well within 100 feet of active development will, with the landowners permission, be inspected and, if needed, properly sealed or replaced at no expense to the owner (see Revised Draft EIR page 4.3-122).

In summary, the Revised Draft EIR anticipated concerns that could be raised with regard to protection of existing sources of water supply and has provided appropriate mitigation to ensure that any impacts, even though improbable, are properly addressed.

Response I2C: The commenters are concerned about provisions for sewer, drainage and flood control. Wastewater collection, conveyance, and treatment are fully addressed in Section 4.11.6 of the Revised Draft EIR. Extension of a modern public sewer system to the project area could enable some residents currently using septic systems to abandon those systems and connect to a public system. The County's Environmental Health Division has identified the Riego area as highly problematic for use of septic systems due to the nature of the area's soils.

The Revised Draft EIR addresses drainage in Sections 4.3.2 and 4.11.9 and flood control is covered in Section 4.3.2. As described on page 4.11-99 of the Revised Draft EIR:

Increased project flows resulting from development within the Specific Plan area are proposed to be mitigated consistent with the Placer County Flood Control and Water Conservation District (Flood Control District) design criteria. All of the analysis and calculations included in the Master Plan were prepared in accordance with the "Preliminary Plan" requirements of the *Storm Water Management Manual* dated September 1, 1990, and the Addendum 1 dated October 1997.

The Placer Vineyards Specific Plan drainage system has been designed to provide detention and retention of increased runoff volumes within the Specific Plan area. In addition to providing detention storage to mitigate the increased rate of runoff, an additional storage component has been added in the detention areas to provide retention of flow volumes for a period of time to allow downstream volumes to drain from the shed.

Contrary to the opinions expressed by the commenters, the project has been designed and provisions made to ensure that all runoff is handled in a responsible manner. Flooding will not be increased to existing properties. And it is possible that existing flood conditions described by

the commenters will be alleviated, due to the construction of an engineered drainage and flood control system where one currently does not exist.

Response I2D: The commenters are concerned about traffic and construction noise impacts. The commenters' property is located on Locust Road in an area designated by the Specific Plan as a "Special Planning Area." The Revised Draft EIR assesses traffic impacts in Section 4.7. Table 4.7-5 shows that Baseline Road in the vicinity of Locust Road (east of County Line and west of Country Acres) currently operates at LOS "A", which is considered to be free flowing with insignificant delays. The conclusion in Impact 4.7-2 is that with or without the project, these segments will continue to operate at LOS "A". Table 4.7-28 shows that under Cumulative Plus Project (2025) conditions with implementation of mitigation measures, these segments will operate at acceptable levels. Under the Placer County General Plan, the County has established a standard of LOS "C" for all roadways and intersections except those for within one-half mile of state highways, where the standard is LOS "D."

Table 4.7-6 notes that the unsignalized intersection of Locust Road and Baseline/Riego Road currently operates at Level of Service "E" during P.M. peak hours. Therefore, this intersection already operates at a level that is below County standards. For cumulative conditions in 2025, the traffic model assumes that the intersection of Locust Road and Baseline/Riego Road will be signalized. With and without the project, the model predicts that with this and other improvements, the intersection will operate at an acceptable level of LOS "C".

The commenter is also referred to the Partially Recirculated Revised Draft EIR, which contains an updated traffic analysis; however, the conclusions described above are not altered.

Noise caused by operation of construction equipment is addressed under Impact 4.9-3 in the Revised Draft EIR.

There is no commonly-accepted threshold for forecasted safety conflicts between vehicles, or between vehicles and bicycles/pedestrians. According to California Highway Patrol (CHP) staff, Locust Road south of Baseline Road has experienced eight vehicle accidents in the past seven years which, according to the CHP, is not considered excessive. There are two 90 degree turns along Locust Road which could present a traffic hazard if trips are added. CHP staff suggests that roadway improvements might help reduce these potential hazards (pers. comm. Officer Kane, August, 2006). Improvements to Locust Road will be made with project buildout.

The general magnitude of potential conflicts is related to traffic volumes and the capacity of the transportation system. Because LOS directly reflects traffic volumes and system capacity, the County considers LOS to be an indicator of potential conflicts. Relatively high traffic volumes and an inadequate transportation system would adversely affect LOS, and result in potential traffic-related conflicts. Because an adequate transportation system will be constructed and acceptable LOS will be maintained at Locust and Baseline and along Locust Road, additional traffic speed mitigation would not be necessary. Also, see Response to Comment 23A.

Response I2E: Commenters are concerned about adequacy of fire and police protection. Fire services are addressed in Section 4.11.2 of the Revised Draft EIR. Police protection is addressed

in Section 4.11.3 of the Revised Draft EIR. Two new fire stations will be added within the project area as well as a 19,000 square foot sheriff's substation. These facilities as well as funding are dealt with by Mitigation Measures 4.11.2-1; 4.11.2-2a, b and c; 4.11.3-1; and 4.11.3-2a and 2b. These measures would ensure that the proposed project does not adversely affect fire and police services to existing residences, and may improve service by reducing response times in the area.

Response I2F: The commenters inquire about school, park, and library facilities and request information on park and open space maintenance. Public schools are addressed in Section 4.11.4 of the Revised Draft EIR. As noted on page 4.11-24 of the Revised Draft EIR, six elementary, two middle, and one high school is proposed for development within the project area. Library services are addressed in Section 4.11.12 of the Revised Draft EIR. It is proposed that a 25,500 square foot library be constructed and maintained in the Town Center. Funding for maintenance of parks and similar facilities is addressed under Impact 4.11.13-3. As noted therein, project proponents are proposing that a County Service Area or other special district be formed to fund and maintain park related facilities. Mitigation Measure 4.11.13-3 requires that a County Service Area or Community Facilities District be formed for the project area to fund maintenance and recreation programs; however, the SPA would be excluded from these funding entities unless a development projects was proposed for the SPA.

Response I2G: Commenters are concerned about Locust Road widening. The existing Locust Road right-of-way varies between 40 and 50 feet in overall width, with a minimum of 20 feet and a maximum of 30 feet of right of way on either side of the existing road centerline, depending on the location along the road. The existing pavement section is an average of 22 feet in width, with an average of 11 feet on each side of centerline. The existing right of way is depicted on Figures 2A, 2B, 2C and 2D at the end of this section.

The proposed improvements to Locust Road consist of adding 4 foot wide paved shoulders on each side of the road. The exiting paved shoulders range from 0 to 2 feet in width. The proposed shoulder widening will add 2 to 4 feet of new pavement on either side of the road. The resultant pavement section will be 30 feet wide overall, with 15 feet wide on each side of centerline, which will fit within the existing right of way. There should be no loss of property associated with the proposed improvements to Locust Road.

Existing homes along Locust Road will be closer to the edge of pavement resulting from the shoulder widening but will not be closer to the travel lanes since the lanes will remain in their existing location at their existing widths.

Response I2H: Commenter is concerned about impacts on existing uses. Land-use conflicts between the proposed development and current agricultural uses in the SPA are addressed by Impact 4.1-7, which notes that the majority of the SPA adjacent to the Specific Plan area is used as pasture. The General Plan requires a 50-foot residential exclusion area and a 50- to 200-foot buffer for other uses under such circumstances. Any existing Use Permit that may have been issued to an existing parcel of land would run with the land and be unaffected by the proposed project and would continue to be subject to the conditions of the Use Permit. Also, see Response to Comments 7B and 12A above. Reference is made by the commenters to the Blueprint

Alternative. Although densities would be increased under this alternative, suitable buffers and separations would be required to be maintained adjacent to SPA properties.

Response I2I: Commenters request future notice and indicate that insufficient time has been allowed for review. The comment is noted. Commenters will be notified by the County of all future hearings on the project.

The first Draft EIR for the proposed Specific Plan was published in September 2004 and a public review period established that did not close until January 5, 2005. A second Revised Draft EIR was subsequently prepared and published in March 2006 and a public review period established that closed on May 19, 2006. The Draft EIR and proposed project have, therefore, been in public view for more than a year. The County considers this to be sufficient time to research and obtain information concerning the project.



SUTTER COUNTY
COMMUNITY SERVICES DEPARTMENT

Animal Control
Building Inspection
Emergency Services
Environmental Health
Fire Services
Planning

Rich Hall, Director
Larry Bagley, Assistant Director,
Permitting Services
Chuck Vanevenhoven,
Fire Services
Mike Harrold,
Emergency Services

May 10, 2006

RECEIVED
MAY 17 2006
PLACER COUNTY

Placer County Planning Department
Attn: Paul Thompson
11414 B Avenue
Auburn, CA. 95603

**Re: Revised Draft Environmental Impact Report (EIR) for Placer Vineyards
(PEIR T20040651/SCH #1999062020)**

Dear Mr. Thompson:

Sutter County thanks you for providing us the opportunity to comment on the revised draft EIR for the Placer Vineyards project. After reviewing the revised DEIR, Sutter County provides the following comments:

Traffic impacts resulting from the Placer Vineyards project upon roadways within Sutter County (Riego Road, Pacific Avenue and State Highway 99) will be significant and must be mitigated.

Section 5.4.2, Transportation Improvements, calls for Riego/Baseline Road to be a "thoroughfare" of 4 and then 6 lanes; however, the document continues to fail to acknowledge the "Riego thoroughfare" impacts at Pacific Ave and State Highway 99. Sutter County believes limiting mitigation to only two intersections on Riego Road in Sutter County is completely unacceptable.

In addition, Sutter County completely disagrees with the conclusions reached in the following sections:

1. Section 4.7-7, Increase daily traffic volumes in Sutter County (less than Significant) No Mitigation proposed.
2. Section 4.7-17, Cumulative Plus on roadways in Sutter County (less than Significant) No Mitigation proposed.

Placer County Planning Department
May 10, 2006
Page Two

In summary, the issues discussed above remain of paramount concern to Sutter County. We will not accept unmitigated project impacts as a result of this project. The revised DEIR does not reduce the impacts identified above through mitigation to levels which are less than significant. For these reasons, the project should be revised to include additional mitigation to reduce the impacts mentioned above to a less than significant level and the project should be re-circulated for review and comment.

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

Sincerely,



Doug Libby, AICP
Senior Planner

DL:se

cc: Public Works Department

LETTER I3 DOUG LIBBY, SUTTER COUNTY COMMUNITY SERVICES DEPARTMENT

Response I3A: Commenter believes the Revised Draft EIR does not adequately deal with impacts at Pacific Avenue and SR-99. The Revised Draft EIR assumes that the Measure M area in South Sutter County would be developed over time. The amount of development in the Measure M area, and the roadway system that would serve that area is not well defined since a formal application for the development has not yet been submitted and accepted by Sutter County. Sutter County was not able to provide more information about the proposed Measure M area other than the limited information available on the County's web site.

For the analysis in the Revised Draft EIR, it was assumed that ultimately about 17,500 dwelling units would be developed in the Measure M area. Full development of those units was assumed in the Super-Cumulative scenario. Cumulative (2025) No Project conditions assumed that about half of those units (8,750) would be developed under Cumulative (2025) No Project conditions. The alignment and number of lanes on the roadways that would serve the Measure M area under ultimate or partial buildout are unknown. It is unknown whether some existing roadways, such as Pacific Avenue would be realigned. It is also unknown how the land uses in the Measure M area would be distributed or where these land uses would access the major street system. For these reasons, a detailed analysis of intersections under Cumulative (2025) conditions was limited to four intersections along Riego Road east and west of the Measure M area: the two intersections at SR 70/99 ramps and the two intersections of Pleasant Grove Road with Riego Road.

While the lack of information on the Measure M area has limited the Revised Draft EIR analysis under Cumulative and Super Cumulative conditions, it does not affect the analysis of the Existing Plus Project scenario. Under Existing Plus Project conditions, all of the signalized intersections along Riego Road or the intersections that have stop signs on Riego Road approaches were analyzed. This includes SR 70/99, Natomas Road and the two intersections of Pleasant Grove Road with Riego Road.

Response I3B: Commenter disagrees with conclusions in Revised Draft EIR Sections 4.7-7 and 4.7-17. The disagreement with the Revised Draft EIR analysis of impacts on Sutter County roadways (Impact 4.7-7 on page 4.7-49 of the Revised Draft EIR and Impact 4.7-17 on page 4.7-83 of the Revised Draft EIR) is noted. However, the comment does not indicate why Sutter County disagrees with the conclusions of the Revised Draft EIR regarding these impacts. Therefore, no further response is possible.

Response I3C: Commenter is concerned about unmitigated project impacts. Due to changes in growth forecasts and plans after circulation of the Revised Draft EIR, a Partially Recirculated Revised Draft EIR was made available for public review and comment between August 1 and September 14, 2006. One of the outcomes of the revised analysis was a new impact on a Sutter County roadway segment. For other Sutter County roadway segments, the proposed project would not cause traffic levels to exceed Sutter County thresholds and impacts are, therefore, considered less than significant. As discussed on pages 4.7-38 and 4.7-39 of the Partially Recirculated Revised Draft EIR, a new significant impact was identified for Pleasant Grove Road north of the Sacramento County line, and mitigation has been identified for the roadway. Significant impacts were also identified for various intersections in Sutter County in the Revised

Draft EIR (see Impacts 4.7-8 on page 4.7-49 through 4.7-51 and 4.7-18 on pages 4.7-84 and 4.7-85), and mitigation was identified for those impacts. The impacts are characterized in the Revised Draft EIR as “significant and unavoidable” because Placer County cannot compel Sutter County to undertake the proposed roadway improvements. The commenter is referred to the Partially Recirculated Draft EIR for further explanation. Also see Response to Comment 38D.

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40

1120 N STREET

P. O. BOX 942873

SACRAMENTO, CA 94273-0001

PHONE (916) 654-4959

FAX (916) 653-9531

TTY (916) 651-6827

*Flex your power!
Be energy efficient!*RECEIVED
MAY 15 2006
PLANNING DEPT

Ms. Lori Lawrence
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

May 11, 2006

Dear Ms. Lawrence:

Re: Placer County's Revised Draft Environmental Impact Report for the Placer Vineyards Specific Plan;
SCH# 1999062020

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public and special use airports and heliports. The following comments are offered for your consideration.

The proposal is a mixed-use master planned community that will provide for over 14,000 residential units over a 20 to 30 year time frame. The project site is located approximately three miles north of McClellan Airport, within the Sacramento County Airport System's draft planning policy area for McClellan. The proposal should be coordinated with the County Airport System and with airport staff to ensure that the proposal will be compatible with future as well as existing airport operations.

Section 11010 of the Business and Professions Code and Sections 1102.6, 1103.4, and 1353 of the Civil Code (<http://www.leginfo.ca.gov/calaw.html>) address buyer notification requirements for lands around airports. Any person who intends to offer land for sale or lease within an *airport influence area* is required to disclose that fact to the person buying the property. Future homeowners and tenants should be advised of the proximity of McClellan Airport and the probability of aircraft overflights.

These comments reflect the areas of concern to the Division of Aeronautics with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our district office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,

Handwritten signature of Sandy Hesnard in cursive.

SANDY HESNARD

Aviation Environmental Specialist

c: State Clearinghouse, Sacramento County Airport System, McClellan Airport

LETTER I4 SANDY HESNARD, DEPARTMENT OF TRANSPORTATION, DIVISION OF AERONAUTICS

Response I4A: Commenter suggests the County coordinate with the Sacramento County Airport System. The comment is noted. See Response to Comment 9A.

Response I4B: Commenter advises the County of its obligation to notify a prospective buyer when a property is located within an “airport influence area.” See Response to Comment 9A. Placer County does not believe that the proposed project is within an adopted “airport influence area.”

William D. Kopper

Attorney at Law
417 E Street
Davis, CA 95616
(530) 758-0757
Fax (530) 758-2844

Paralegals
Kristin Rauh
Jan Scott

May 11, 2006

Planning Department
Placer County
11414 "B" Avenue
Auburn, CA 95603

RECEIVED
MAY 11 2006
PLANNING DEPT

Re: Placer Vineyards Specific Plan Revised Draft EIR
SCH #1999062020

Dear Planning Staff:

These comments on the Placer Vineyards Specific Plan Revised DEIR ("DEIR") are submitted on behalf of Rob Collins, Mark Steelman and Michael Williams. These are their comments. The comments include those of Robbi S. Keil, air quality consultant; Daniel Smith, traffic engineer; and Mark Grismer, hydrologist. We also incorporate into our comments all of the comments of other individuals and organizations, and intend to rely on those comments as well as our own. Furthermore, we oppose Placer County adopting the Placer Vineyards Specific Plan and the General Plan and Community Plan Amendment, Development Agreements and Placer Vineyards Specific Plan EIR. In these comments, we intend to highlight some of the deficiencies in the DEIR, and we also request information.

My clients believe that the Placer Vineyards Specific Plan is premature. The Placer Vineyards area should be planned regionally to make certain that the maximum amount of quality habitat is preserved. The area should be planned regionally so that the location of the Placer Parkway is consistent with the needs of each development in the West Placer County area. Placer County's approach of piecemeal approval of massive development projects will assure that the natural habitat in West Placer County is destroyed, air pollution in the area will become substantially worse, and traffic will become gridlocked. The air quality of the West Placer area is significantly polluted with ozone (smog) and particulates (dust and smoke). Smog pollution poses a serious health risk. Recent clinical studies show that chronic exposure to smog irreversibly reduces lung capacity, lowers stamina, and leaves people vulnerable to long-term respiratory problems. Smog is especially harmful to children, senior citizens, and those who suffer from heart or lung disease. This Project will increase the suffering from respiratory diseases in the West Placer County area, and also in the Roseville area. More citizens will suffer from asthma, emphysema, and other lung and heart diseases.

A

B

The County appears determined to limit public input on the Placer Vineyards Specific Plan. Guidelines §15141¹ states that the text of Draft EIRs should normally be less than 150 pages, and for proposals of unusual scope or complexity, should normally be less than 300 pages. In this case, the text of the EIR included in the Executive Summary and volumes 1 through 3 is 1644 pages, more than five times the number of pages recommended for complex projects. Nevertheless, Placer County has only provided 45 days for review of the proposal. Any reasonable agency presenting the public with an EIR that was more than five times the maximum length recommended in the Guidelines would allow more than 45 days for the public review period. The County has not allowed sufficient time for review of the documents and for consideration of the many issues raised by the Placer Vineyards project. The County has also interfered with public participation. Commenters' Traffic consultant, Dan Smith, requested the traffic modeling data on April 27, 2006. This information should have been included in the traffic appendix and is it with most EIRs. Mr. Smith was told that a CD with the traffic modeling data would be mailed out right away. Instead of mailing it right away, the County waited until May 9th to mail the data. If Commenters would have known that the County would delay in sending information, they would have sent a runner to the County to retrieve the data. The withholding of data is another reason to re-circulate the EIR. As we demonstrate in these comments, the County has made many procedural and substantive errors that require it to recirculate the Environmental Impact Report and address important concerns ignored by the environmental documents.

C

1. Failure to Make Documents Available for Public Review for the 45 Day Requisite Review Period.

Public Resources Code Section 21091(a) states that the public review period for a draft Environmental Impact Report shall be at least 45 days. In this case, the 45 day review period should begin when the Project documents and the draft Environmental Impact Report were complete. The Project documents were incomplete because they did not include the financing plan. The draft Environmental Impact Report was incomplete because the financing plan was a necessary element to provide mitigation for the Project's impacts.

D

The proposed Specific Plan fails to comply with Government Code Section 65451(a)(4) because it fails to provide financing measures necessary to carry out the elements of the Specific Plan. Therefore, the DEIR was incomplete and CEQA review was premature. The Specific Plan and the DEIR must be revised to comply with Government Code Section 65451(a)(4) and recirculated for the requisite 45 day CEQA review.

Government Code Section 65451(a) requires that "a Specific Plan shall include a text and diagram or diagrams which specify all of the following **in detail**":

- (2) The distribution, location, and extent of uses of land -- within the area covered by the plan;

¹ "Guidelines" refers to Title XIV of the California Code of Regulations, §§15000 to 15387

- (3) The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.
- (4) Standards and criteria by which the development will proceed
- (5) The program of implementation measures including regulations, programs, public works projects, and **financing measures** necessary to carry out paragraphs (1), (2), and (3).

The financing measures required by Government Code §65451(a)(4) are planned to be included in the financing plan. Fee based mitigation must provide sufficient revenues to ensure that the mitigation will actually occur. "The commitment to pay fees without any evidence that the mitigation will actually occur is inadequate." (*Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 140, citing *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 728.) Without review of the financing plan with the Specific Plan and the Specific Plan EIR, it is impossible to know whether any of the mitigation will actually occur. The public needs to be able to review the fee program in conjunction with the mitigation measures to determine if there are sufficient fees to pay for the improvements that are necessitated by the Project. In the case of *Napa Citizens for Honest Government v. Napa County Board of Supervisors* ("*Napa Citizens*") (2001) 91 Cal.App.4th, 342, 363-365, the court notes that the EIR included information about the fees to be generated by the project. The court stated: "Although the existing mitigation fee appears to be a reasonable attempt to have developers pay their proportionate share of the costs of needed highway improvements, and the continued use of such fees undoubtedly would be useful, it cannot reasonably be argued that the funds that the county already has raised or that it reasonably can expect to raise in the future, will be enough to mitigate the effect on traffic that will result from cumulative conditions." In this case, the EIR includes absolutely no information on the fee program and the amount of fees to be generated. Instead, all of the information concerning the traffic fees and other fees are hidden in the financing plan, which is not available to the public at the time of the Draft EIR comment period. Therefore, the public cannot possible comment on whether the fees to be generated will be sufficient to mitigate the traffic impacts that will result from the cumulative conditions. Moreover, it is impossible to tell from the information that has been available whether the traffic impact fees will be sufficient to mitigate the impacts from the Project itself, without the other cumulative projects in the area.

D cont.

There is also missing information about the mitigation of air pollution impacts. The air pollution section does not include a calculation of the effectiveness of the proposed mitigation measures to reduce the air pollution impacts of the Project. There is therefore insufficient information as to the number of air pollution offsets that will have to be purchased in order for the Project to comply with the requirements of the Placer County Air Pollution Control District to produce no more than 10 lbs. per day of ROG and NOx. Without seeing a copy of the financing plan or other information related to the financing of the purchase of air pollution offsets, the public has no assurance that the air pollution offsets will actually be purchased. For these reasons, and many other reasons, the financing plan should be made available for public review and the DEIR should be recirculated.

2. The public hearing notice did not comply with law.

The public hearing notice did not include a description of the important changes to General and Community Plan documents. One important amendment is to Policy 9 of the Dry Creek/West Placer County Community Plan. This policy stated in part:

“Land development projects shall be approved if LOSC can be sustained on the CIP roads and intersection after: (a) traffic from approved projects has been added to the system and (b) improvements funded by this program have been constructed.”

Instead of the hard and fast rule set forth by Policy 9 that LOSC must be sustained in the Dry Creek/West Placer Community Plan area, part of the Project includes an amendment to this policy so that the County may make exceptions to LOSC standards. The EIR includes no analysis as to how this change in the LOSC standard will contribute to added air pollution in the region as cars idle longer on roads and at intersections. Not only does the notice not reference this particular significant change in the Plan, but the EIR includes no analysis of the environmental impacts of such a change.

Additionally, the notice is defective because it inaccurately describes the Project as 14,132 homes. In fact, the County circulated two Specific Plans which are both considered in the Environmental Impact Report. One Specific Plan includes 14,132 allowable dwelling units, but the other Specific Plan (known as the Blueprint Plan) includes 21,631 homes. The Blueprint Plan states as follows:

“In conjunction with the Specific Plan, an Environmental Impact Report has been prepared to study the environmental impacts the project may create. Some of the elements analyzed in the Environmental Impact Report are population, traffic, schools, fire protection, plant and wildlife species and habitat, archeological areas, plan alternatives and mitigation measures. The purpose, policy and detail requirements of this Specific Plan will implement the mitigation measures contained in the EIR.”

Therefore, it is clear that the draft Blueprint Specific Plan is on equal footing with the draft Placer Vineyards Specific Plan. The draft Blueprint Specific Plan has its own alternatives and an EIR to describe the impacts of the draft Blueprint Specific Plan. The County failed to include in its notice that the Placer Vineyards Specific Plan was also evaluated in the EIR and that the number of units for the draft Blueprint Plan is 21,631. Accordingly, the population of the area may be much greater than as described in the notice. Because the notice is flawed and does not describe the maximum number of housing units and impact, the EIR must be recirculated.

3. The Draft Environmental Impact Report Does Not Comply with the Law Because it Is Excessively Long, and Written in a Way That Is Virtually Impossible for the Public to Understand.

CEQA Guidelines §15140 states: “The EIR shall be written in plain language and may use appropriate graphs so that decisionmakers and the public can rapidly understand the documents.” CEQA Guidelines §15141 states that “The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages.” The

E

F

DEIR for the Placer Vineyards Specific Plan is 1644 pages, more than five times the length that is permitted for a complex project. The reason the Draft EIR report for the Placer Vineyards Specific Plan is so long is that it includes large sections of duplicative language, is written in obscure language and includes thousands of lines of text which are irrelevant and confusing.

Guidelines §15121 states that: "An EIR is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project." An Environmental Impact Report violates its important purpose of informing the public when it is incomprehensible because of its excessive length and draconian language. The Placer Vineyards Specific Plan appears to be written to discourage public participation by including so much irrelevant and duplicative language that it is virtually impossible to penetrate to discover the important elements of the Project.

"Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities." (CEQA Guidelines §15201.) The "public review process provides the dual purpose of bolstering the public's confidence in the agency's decision and providing the agency with information from a variety of experts and sources." (*Schoen v. California Department of Forestry and Fire Protection* (1997) 58 Cal.App.4th 556, 574.)

F cont.

The California Supreme Court has emphasized the importance of public participation. The Court has stated that CEQA should be "scrupulously followed" so that "the public will know the basis on which its responsible officials either approve or reject environmental significant action," and "will be able to respond accordingly to action with which it disagrees." Thus, "[t]he EIR process protects not only the environment but also informs self government." (*Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.)

The Environmental Impact Report prepared by Placer County for the Placer Vineyards Specific Plan violates all of these provisions. An EIR that includes duplicative and unnecessary material and exceeds 1600 pages in length does not fulfill the purpose of an Environmental Impact Report, which is to inform the public of the impacts of the Project.

4. Project Description.

Figures 3-1, 3-2 and 3-3 show the general proposed area of the Placer Vineyards Specific Plan. However, none of the figures show the plan area with respect to the City of Roseville city limits and sphere of influence. This information should be provided in the EIR so that the public can determine the relationship of this Project to the City of Roseville.

G

5. Land Use.

On page 4.1-47, the EIR talks about agricultural buffers and buffers between uses. The General Plan amendments requested by the EIR allow for a specific plan to have different buffers than set forth in the General Plan. However, the EIR does not explain how the buffers provided in the Specific Plan vary from those that are allowed by the General Plan. The EIR should provide this information.

H

6. Mitigation Measure 4.4-1A

Mitigation Measure 4.4-1A provides a substantial amount of open space must be preserved elsewhere, preferably within Placer County, to offset the loss of open space due to Specific Plan area development. On page 4.1-51, the EIR states that most of the identified lands are "spread over the Western Placer County area." Figure 4.1-8 shows some of the proposed lands. Commenters ask why the proposed mitigation lands are not closer to the path of development so that the permanent open space areas may be used to discourage the development of land that is not slated for development in the General Plan.

7. Agricultural Water Supply.

On pages 4.1-61 to 4.1-63, the EIR discusses that potential impacts may occur as a result of compliance with Standard 8 (Agricultural Water Supply) of Exhibit 1 of the Dry Creek/West Placer Community Plan. Standard 8 of Exhibit 1 of that plan states that: "Development within the Specific Plan area should assist in the provision of affordable agricultural water to surrounding agricultural lands. Sources of such agricultural water include claimed and retained water and newly developed surface water sources." This community plan policy parallels several policies of the Placer County General Plan. These policies include the following:

- 7.D 1. The county shall support efforts to deliver adequate surface water to agricultural areas with deficient water supplies.
- 7.D 3. The court should participate with cities and special districts in establishing programs for the agricultural re-use of treated wastewater in a manner that would be economically beneficial to agriculture.
- 7.D 4. The county shall participate and encourage multi-agency participation in water projects where such coordination can improve the likelihood of providing affordable irrigation water to areas of Placer County with deficient water supplies.

In order to comply with Standard 8 of Exhibit 1, the EIR hypothesizes a plan whereby the City of Lincoln would construct additional recycled wastewater storage and conveyance facilities at the City of Lincoln Wastewater Treatment and Reclamation Facility. The developers in the Placer Vineyards Specific Plan area would pay fees to the City of Lincoln to obtain water from the recycling program, which would be used for agriculture. However, as is pointed out on page 4.1-62, the whole project is speculative. Fee based mitigation is only adequate mitigation if it will result in the mitigation actually being developed. As the EIR points out, there are no assurances that the mitigation will ever occur. There is no alternate proposal to purchase surface water from PCWA, the San Juan Water District, or any other agency to provide "affordable agricultural water to surrounding agricultural lands." Therefore, the Project has not only failed to mitigate an important impact, but the Project is also inconsistent with the Dry Creek/West Placer Community Plan and the Placer County General Plan. The EIR does not discuss the inconsistency with the Community Plan and Specific Plan because of the Project's inability to provide affordable agricultural water to surrounding lands.

8. Ground Water Use.

On page 4.3-49, the EIR discusses groundwater use. However, the EIR does not discuss groundwater use in dry years or a series of dry years. The City of Roseville contract may limit the

City of Roseville to as little as 50% of its surface water supply in a series of dry years. The EIR needs to discuss how the Specific Plan area relies on groundwater in dry years, along with dependence of other jurisdictions on groundwater may affect the groundwater table in a series of dry or very dry years.

K cont.

9. Traffic.

Commenters note that the intersection of Fiddymont Road and Baseline Road is observed to operate at Level of Service F, while it is modeled to operate at LOS D. Likewise, the intersections of Natomas Road and Riego Road, Pleasant Grove Road North and Riego Road, and Pleasant Grove Road South and Riego Road, all were observed to operate at LOS F, even though they were modeled to operate at LOS C or D. Commenters ask whether all the other intersections were actually observed, or were they just subject to calculations? If the observed delays at the four noted intersections are so much greater than the model delays, how can the County be confident of the circular 212 calculation methodology? The circular 212 calculation method is an outdated temporary method. Please state why this methodology is used in the EIR.

General Plan Policy 3.A7 states that the roadway system shall be designed to maintain the following minimum level of service: "LOS 'C' on urban/suburban roadways except within ½ mile of state highways, where the standard shall be LOS 'D'." Policy 5.1 of the Specific Plan states that: "Within the boundaries of the Specific Plan area and on its boundaries, the Placer Vineyards roadway system will be developed and managed to accommodate a level of service D." The EIR does not explain how the Specific Plan LOS D is consistent with the policy set forth in Section 3.A7 that urban/suburban roadways operate at LOS C except within ½ mile of state highways. It would appear that the level of service standard in the Specific Plan should exactly parallel the language in the General Plan. Please state why this is not the case.

L

The mitigation measures set forth in Mitigation Measure 4.7-2A do not provide any mitigation for project impacts on other jurisdictions. For example, item 6 on page 4.7-38 states that the developers of the Specific Plan shall pay impact fees to Placer County in amounts that constitute the Specific Plan's fair share contributions to transportation facilities in the City of Roseville, Sacramento County and/or Sutter County needed because of the Specific Plan. However, those fees will only be made available to other jurisdictions if an agreement is entered into pursuant to Placer County General Plan policy 3.A.15(c). The EIR provides no figures as to the costs of the improvements in other jurisdictions that are specified in the EIR. Perhaps these costs are included in the financing plan. However, the public needs to see the costs of the improvements in the other jurisdictions and the proposed impact fees to determine if the fee based mitigation will be effective. The EIR assumes that it will not be effective, and therefore almost all of the Specific Plan's impacts on other jurisdictions are considered significant and unavoidable.

Nevertheless, the EIR appears to differ with the Specific Plan itself. The Specific Plan policy 5.7 states as follows:

"Offsite transportation improvements. Placer Vineyards shall provide traffic signals and offsite intersection improvement, in conjunction with development in the Plan area at the following location: 1) Riego Road and East Natomas Road, 2) Riego Road and Pleasant Grove Road, 3) Baseline Road and Pleasant Grove Road, and 4) Watt Avenue and PFE Road."

On page 4.7-50 of the EIR, the EIR states that the project will only contribute its fair share to the improvements a Riego Road and East Natomas Road, Riego Road and Pleasant Grove Blvd., and Baseline Road and Pleasant Grove Road. Therefore, it appears that the EIR does not evaluate the requirements of the Specific Plan. The Specific Plan requires the Placer Vineyard Project to pay for the offsite improvement in four locations. It does not provide for simply participation in a future, vague funding plan.

As set forth in Section 4.7-70 and 4.7-71, the cumulative conditions of the Project with other projects planned in West Placer County will not allow the County to meet the level of service requirements set forth in Section 3.A.7 of the General Plan policies. Nevertheless, the Project EIR includes no discussion of the Project's potential inconsistency with the level of service requirements of the County General Plan.

General Plan Policy 6.F 7. states that "The county shall encourage development to be located and designed to minimize direct and indirect air pollutants." Most of the traffic impacts that are evaluated in the traffic section of the EIR are considered significant and unavoidable because they involve massive improvements in Sacramento County, on the state freeway system, in the City of Roseville or in Sutter County. The EIR notes that there are no agreements with these agencies for such improvements, but that the Specific Plan will pay its fair share. If the Specific Plan and financing plan are approved prior to agreements with the other jurisdictions, there is no assurance that such fees will be paid, and if they are paid that they will be sufficient. This is especially true since the County has not shared the development agreements or the financing plan with the public prior to the close of the comment period on the draft EIR.

L cont.

The County apparently believes that it can approve the Specific Plan even though such approval may create massive gridlock if traffic circulation improvements are not completed in other jurisdictions. However, the EIR does not consider the air pollution impacts of the restricted traffic flow. The URBEMIS modeling that was completed for various traffic scenarios, and also the CalLine 4 modeling for carbon monoxide, is based on the improvements all being in place and there being a smooth flow of traffic. The EIR needs to complete air pollution modeling based upon the gridlocked traffic scenario in the traffic section of the EIR.

The traffic section of the EIR includes only modeling of the p.m. peak hour traffic and improvements for the p.m. peak hour traffic. The improvements for the p.m. peak hour traffic will not accommodate the needs of the a.m. peak hour traffic, which usually goes in the opposite direction. If the EIR is to provide an adequate analysis of traffic impacts and needed improvements, the traffic section must also model the a.m. peak hour. This is a serious deficiency in the traffic section of the EIR.

General Plan Policy Section 3.A.14 states: "The County is to assess fees on new development sufficient to cover the fair share of the development's impact on the [] regional transportation system." In this case, the EIR and appendices have not provided any information on the costs of improvements needed in Placer County, Sacramento County, Sutter County, Roseville and the state freeway system. Before the County's General Plan Policy can be complied with, this information is necessary. The public needs to see the financing plan to make sure that it will be adequate to provide traffic mitigation on a regional basis.

10. Energy Conservation Issues.

The EIR is deficient because it did not comply with the requirements of Appendix F of the Guidelines. Appendix F states as follows: "In order to assure the energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include the discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy."

The EIR is to include some if not all of the following items:

- 1) Energy consuming equipment and processes which will be used during construction, operation, and/or removal of the project. If appropriate, this discussion should consider the energy intensiveness of materials and equipment required for the project;
- 2) Total energy requirements of the project by fuel type and end use;
- 3) Energy conservation equipment and design features;
- 4) Initial and lifecycle energy costs or supplies;
- 5) Total estimated daily trips to be generated by the project and the additional energy consumed per trip by mode.

In this case, there is no discussion of the energy issues except for the operating energy demands of the buildings in the Project after they are constructed. In view of the fact that the Project will add more than 200,000 daily vehicle trips to the area, the EIR should include some discussion of the additional energy requirements related to all of the vehicle trips. The EIR does include information about the supply of energy to the Project site, and it does include some possible energy conservation provisions. In the air pollution and energy sections, there is a provision to promote passive solar building design and landscaping conducive to passive solar energy. Additionally, mitigation measure 4.8-3B requires residential consumption of energy to be reduced 10-20% below the requirements of Title 24. Mitigation measure 4.8-3F promotes transit usage. Nevertheless, the EIR does not comply with the requirements of CEQA. Except for compliance with Title 24, there is no discussion about energy conservation for the many commercial, industrial, and public buildings that will be constructed in the Specific Plan area. The EIR does not include a discussion of "the Project's energy requirements and energy use efficiencies by amount and type of fuel used for each stage of the Project's lifecycle, including construction, operation, maintenance and/or removal." The information that is required by Appendix F is missing. There is no discussion on the effect of the Project on "energy resources." Additionally, the EIR does not discuss "the project's projected transportation energy use requirements and its overall use of efficient transportation alternatives." There is no discussion of cumulative energy demand in conjunction with other West Placer projects.

The EIR does not include any of the following items:

- 1) Potential measures to reduce wasteful and inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the Project and why other measures were dismissed;

- 2) The potential site, orientation and design to minimize energy consumption, including transportation energy. (The only exception is the optional passive solar orientation.)
- 3) The potential for using peak energy demand;
- 4) Alternative fuels (particularly renewable ones or energy systems). (The only discussion is the alternate use of solar in homes, which is not mandatory.)
- 5) Energy conservation which could result from recycling efforts

M cont.

The alternate discussion did not consider overall energy consumption in terms of reducing wasteful, inefficient and unnecessary consumption of energy. There were no energy consumption calculations in consideration of alternatives. There was no discussion in the EIR about avoiding the wasteful, inefficient and unnecessary consumption of energy during the project construction, operation and maintenance of the Project. Finally, there was no discussion of the short term gains versus long term impacts that could be compared by calculating the energy costs over the lifetime of the Project.

11. Water Supply Information.

The water supply information in the EIR is not adequate, and the water mitigation measures are not adequate. On page 4.11-81 the EIR states that the PCW estimates that it has 10.7 million gallons per day of unallocated capacity that may be wheeled through the City of Roseville system. Please explain why this statement is realistic. It appears there are a number of factors that would make this statement of availability of water supply to 2012 unrealistic. These factors include the following:

- 1) The Placer County Water Agency 2001 Urban Management Plan states on page 4-7 that the 35,500 AFA diversion from the American River may not be available until 2009. The current diversion is only 13,000 AFA. Therefore, PCWA's total available water to Zone 1 and 5 until the 2009 improvements are completed is 113,400 AFA. This is less than the 2010 demand (excluding the Placer Vineyards Project and all other pending developments in Western Placer County). The 2010 demand is estimated at 121,414 acre feet. This includes a water loss of 7,240 AFA and total demand of 114,174 AFA for Zones 1 and 5. Please state how the authors of the EIR justify that there will be any water available for the Project prior to the completion of the American River diversion in approximately 2009.

N

Please note the later date should be used because the contract for the work has not yet been finalized. The contract went out for bids, but all the bids were too high.

- 2) Page 4.11-81 states that 8.68 million gallons per day of the water that can be wheeled through Roseville remains uncommitted. The EIR needs to inform the public about the current usage of the water that is being wheeled through Roseville. Which parties and agencies are using this water, and why will the current uses for wheeled water be discontinued in the future.

- 3) On page 4.11-81, the EIR correctly reports the PCWA's position that the wheeled water through Roseville would be based on a first come, first served basis. However, the EIR

provides no explanation as to why the Placer Vineyards Project would get all of the water that is wheeled through Roseville. Please state why this assumption is supportable. There are at least four other major projects that could use the water that is being wheeled through Roseville, including Curry Creek, Regional University, Placer Ranch and Lincoln Crossing. Please state why it is reasonable for the EIR to assume that all of the water that is wheeled through Roseville will be available to the Placer Vineyards Project. If only a small portion of the wheeled water is available to the Placer Vineyards Project, then it is not realistic to believe that there would be a water supply for the project before 2012. Please discuss these issues in detail.

There is clearly a substantial question about whether water will be available for this Project. The EIR includes the following mitigation measures:

Prior to recordation of any small lot subdivision map, or prior to county approval of any similar project-specific discretionary approval or entitlement required for non-residential uses, the applicant shall demonstrate the availability of a long-term, reliable water supply from a public water system for the amount of development that would be authorized by the final subdivision map or project-specific discretionary non-residential approval or entitlement. Such a demonstration shall consist of a written certification from the water service provider that either existing sources are available or that needed improvements will be in place prior to occupancy.

Mitigation 4.11.71C: the county shall confirm with PCWA that uncommitted capacity remains to wheel the required amount of PCWA-supplied water to the specific plan area prior to approval of discretionary actions. In the event sufficient uncommitted capacity does not exist, the county shall not grant the proposed tentative subdivision map or other project level discretionary approval until the county determines that a water supply not dependent on water from PCWA that is wheeled through the Roseville system becomes available for the area at issue.

N cont.

These mitigation measures appear to violate California case law. In *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 205-206, the Fifth District Court of Appeals overturned a county's approval of a specific plan for a 25-year phased development because the EIR did not address how water could be obtained after the first five years (although a water district had been created and the applicant was "pursuing several sources"). The court specifically rejected the county's excuse that if water could not be found for future phases, then "not building a portion of the project is the ultimate mitigation." Yet in this case, the mitigation measures use the same excuse. That is, if the water is not available, future phases of the Project will not be built.

Besides being illegal, there is another problem with building part of the Project and then stopping if water is not available. The construction only part of the Project infrastructure may lead to flooding downstream. See report of Dr. Grismer.

The EIR needs to address how much of the wheeled water through Roseville will be available, and which projects are likely to compete for that water and make use of the wheeled water from the City of Roseville. The first shortcoming of the water supply section of the EIR is that it does not show that the water will be available during the first phases of the Project. The earliest that

PCWA would have any capacity for this Project would be when the American River facilities are completed and can deliver 35,500 AFA to the PCWA system. Yet approval and construction of the Project does not appear to be related to PCWA even having the 35,500 American River diversion in place.

The other problem with the water section is that even with the American River diversion in place by 2010, there is no showing that there will be sufficient water available for the Project. In *San Diego County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831, the Fourth District Court of Appeal held that an EIR is inadequate if it fails either to show that the identified source of water is sufficient to serve both the project and the current users or, alternatively, to address "the effect of that delivery [to the project] on water service elsewhere in the water district's jurisdiction." The Project here fails both of these tests: the county's EIR fails to (1) identify sufficient water supplies for all phases of the Project, and (2) address the impacts on other competing users if water is delivered to the Project.

Once the Placer County Water Agency has the American River diversion in place, 35,500 acre feet per year will be available from the American River for Zones 1 and 5, including the 100,400 AFA from the Yuba/Bear River. The PCWA will have 135,900 AFA available for Zones 1 and 5. However, the 2010 water loss is 7,240 AFA and the Table 3-10 uses are 114,174 AFA without the new developments in West Placer County. Therefore, of the 135,900 AFA capacity, there is only 14,486 AFA excess.

The EIR indicates that the Placer Vineyards will need approximately 11,500 AFA at build-out, and that the other projects in West Placer County as listed on page 5-87 of the EIR would need approximately 40,000 AFA. The EIR should include data on how the 40,000 AFA was estimated. We have attached a table of potential water demands that indicates Curry Creek, Regional University, Placer Ranch, and Lincoln Crossing will require about 29,614.34 AFA based upon similar demand factors used for the Placer Vineyards study. The Riolo Vineyards, Morgan Place and Silver Creed projects should require approximately another 666.74 AFA for a total of about 30,281.08. If the authors of the EIR disagree with our figures, they should state why and provide an alternative basis for these estimates. The 2000 AFA for each university is based upon UC Davis' use of 3000 AFA for a campus with 24,000 students. (See attachment.)

N cont.

Therefore, the demand for PCWA water is 41,781 AFA without the Roseville projects (Second Phase West Roseville Specific Plan, Sierra Vista Specific Plan, and Creekview Specific Plan).

As the EIR states, PCWA does not have enough water for the Placer Vineyards Project without 35,000 extra AFA from a diversion at Folsom or 35,000 AFA from the Sacramento River. However, each of these sources are speculative, since no EIR has been completed concerning the diversion from the Sacramento River, it is unknown whether the 35,000 AFA from that river can occur. Currently the PCWA has no rights to CVP water from the Sacramento River. The PCWA would have to make some type of water trade that would allow it to take the 35,000 AFA from the Sacramento River. At the time that the DEIR was issued, there was no information available that indicates the PCWA has the authority to take 35,000 AFA from the Sacramento River. Therefore, the 35,000 AFA from the Sacramento River is a speculative source of water, and is not available water for the Project. The California case law indicates that the project must have a definitive source of water (that does not impair water availability to other projects) before it can go forward. Placer

County needs to plan all of West Placer County together in a regional plan, to determine whether the water for the Project is available. The County is not permitted by CEQA to approve projects on the basis that the water may be available.

In view of the fact that the water from the Sacramento River is speculative, the authors of the EIR present an alternative source of water from Folsom Lake. This approach is an apparent effort to comply with *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, where the court suggested that if the water supply was uncertain, then the agency needed to identify a secondary source of water. In this case, the secondary source of water is equally or more speculative than the first source of water. While PCWA has water rights that exceed the 35,000 AFA that it proposes to divert from Folsom or the American River as a secondary source of water for the Project, no environmental review has been done to determine whether in fact these diversions could take place. The Water Forum Agreement does not provide the PCWA with additional diversions from the American River or Folsom beyond the 35,500 AFA that should be in place by 2009. There may be significant environmental consequences to wildlife and fishery resources of further diversions from the American River or Folsom. Before it may be assumed that additional diversions will be available from the American River or Folsom, an environmental study needs to be completed. In view of the fact that both the Sacramento River diversion or the American River/Folsom diversion of 35,000 AFA is necessary before the Project can go forward, the County has piecemealed the environmental review by approving the Project without the environmental review related to the feasibility of water diversions.

Even with the additional 35,000 AFA from either Sacramento or Folsom/American River, it is unclear that there will be sufficient water available for all the projects that are planned for West Placer County. Once the 35,000 AFA is available, there may be 49,486 AFA available for the Placer Vineyards and all the other projects in West Placer County. At this available capacity, approximately 41,781 AFA will be consumed by the Placer Vineyards, Curry Creek, Regional University, Placer Ranch, Lincoln Crossing, Riolo Vineyards, Morgan Place and Silver Creek. That would leave only about 7705 AFA for the Roseville projects including completion of the West Roseville Specific Plan, Sierra Vista Specific Plan, and the Creekview Specific Plan. The FEIR needs to calculate the demands for these projects to determine whether or not, even with the 35,000 AFA, there will be enough water available for all the projects that need water. The second phase of the Roseville Specific Plan, which included approximately 4500 housing units, could not be approved at the time of the West Roseville Specific Plan approvals due to the City's failure to identify water for those units. Therefore, it would appear that the City of Roseville will be competing for the same water resources that the County has identified for its West Placer County projects. The EIR needs to specify in greater detail the demand.

N cont.

The EIR also fails to accurately reflect the true water availability. Water, such as PCWA's 120,000 AFA, that is part of the Middle Fork project, is not true water that is available for consumption by West Placer County projects. The only true water that is available is water that can be legally diverted and used for urban use. Any legal diversion of water has to account for the environmental impacts of such diversion. Therefore, the actual available water to PCWA may be much less than calculated by the sum of its permits and contracts.

The cumulative impact section with respect to water also does not take into account added water demand in the City of Roseville related to the densification of the city. For example, the Hewlett-Packard/JMC Rezone Project (SCH #2005122025) is an example of a project that will

create a greater water demand than was originally anticipated in the City of Roseville figures. The same densification may occur in other cities served by the PCWA.

The Urban Water Management Plan dated December, 2005, indicates that in the dry years the Yuba/Bear River supply may be cut by 50%. If this supply cut occurs, there will be a substantial shortfall. Please state how the authors of the EIR would compensate for a 50,200 AFA drop in water supplies to Zones 1 and 5. It would appear that substantially more groundwater pumping would be necessary in the very dry years where there was a loss of one half of the Yuba/Bear River water. The EIR does not appear to have addressed the impact of the groundwater pumping in the event of a 50% loss of Yuba/Bear River water.

N cont.

12. Sewer Service.

The waterwater collection, treatment and disposal section of the EIR provides the capacity of the DCWTP as 18 million gallons per day. However, the EIR does not explain the maximum capacity under wet weather flow. Moreover, the EIR does not state how much of the wet weather flow capacity has been used. The dry flow capacity and wet weather flow capacity both have to be considered to determine how much capacity remains. RMC Table 3 indicates that the average dry weather flow in 2004 was 10.36 million gallons per day, but the average wet weather flow was 27.8 million gallons per day. Nevertheless, the EIR does not state what the wet weather flow capacity is of a DCWWTP.

As is pointed out on page 4.11-39, the availability of the DCWWTP is on a first come, first serve basis. However, those projects within the DCWWTP area have priority. Among the projects that may contribute to DCWWTP usage, the EIR does not consider densification in the City of Roseville. For example, the Hewlett-Packard/JMC Rezone Project is responsible for an increase in wastewater treatment needs in the City of Roseville. Yet this particular project, which should be known, is not considered in the Project EIR.

Mitigation measure 4.11.6-1C states that: "All new developments in the Specific Plan area shall comply with the General Plan policy for period D. 2 which requires written certification from the service provider that either existing services are available or needed improvement will be made prior to occupancy to meet wastewater demands of the Specific Plan." This type of mitigation measure is not acceptable mitigation under the applicable case authority. The wastewater system or availability of wastewater services must be in place prior to a project approval.

Additionally, Section 4.11.1-1D states that: "Approval of the Specific Plan shall be premised on concurrent county approval of a financing plan for funding the necessary wastewater collection facilities needed to serve the Specific Plan area." The public should have an opportunity to review the financing plan upon circulation of the EIR so the public will have input as to whether the financing plan is adequate.

On pages 4.11-49 to 4.11-51, the EIR acknowledges that expansion of existing wastewater treatment facilities will be necessary to accommodate the Placer Vineyards Project. Mitigation measure 4.11.6-2B states: "Specific Plan proponents shall participate financially through connection fees and other financial mechanism in the construction of additional wastewater treatment capacity sufficient to accommodate projected flows and treatment at the DCWWTP and/or the SRWTP. In addition, Specific Plan proponent shall prepare or shall provide a fair share contribution toward the

O

preparation of any additional CEQA analysis that may be required for plant modifications and/or expansions." Neither DCWWTP nor SRWTP, as of the time of the publication of the DEIR had made a commitment to accept the wastewater flows from the Placer Vineyards Project which is outside the jurisdictional boundaries of both facilities. Therefore, any potential wastewater treatment for the Placer Vineyards is speculative as of the time of publication of the DEIR. CEQA does not permit the approval of a project where the wastewater treatment is speculative.

The EIR has also not provided environmental analysis of the impacts of expanding the DCWWTP. Since expansion of the DCWWTP will be necessary because of the Placer Vineyards, the Placer Vineyards Project EIR must discuss the environmental impacts of the expansion. The Placer Vineyards EIR has not included a discussion of the air pollution impacts that are related to operating an expanded DCWWTP facility. There are also issues related to changes in dissolved oxygen as a result of the expansion of the DCWWTP. The RMC report states that mitigation measure 7.2 may address the problem with dissolved oxygen levels in Dry Creek. The RMC report provides no explanation as to how mitigation measure 7.2 will address this problem. More importantly, there is not any baseline data related to the dissolved oxygen impacts of the DCWWTP, since this impact was not considered in the 1996 EIR for the DCWWTP. The EIR needs to address these issues in greater detail.

O cont.

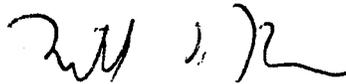
The EIR does not include any information regarding environmental impacts of an expansion of the SRWTP. Since expansion of the SRWTP is one of the options for providing wastewater treatment for the Placer Vineyards Specific Plan, the EIR needs to provide a discussion of the environmental impacts related to expansion of the Sacramento Regional Water Treatment Plant. There would certainly be air pollution impacts related to the expansion of the SRWTP. There is no discussion of the environmental impacts related to expansion of the SRWTP.

13. Incremental impacts on water quality.

In discussing the incremental impacts of water quality, the EIR refers to technical appendix H and technical appendix G. (See page 5-32 to 5-33.) None of the documents referred to were actually available in the appendices. This information is necessary to evaluate the adequacy of the EIR, but it was not made available to the public.

P

Sincerely,



WILLIAM D. KOPPER

WDK:js

POTENTIAL WATER DEMAND

Project	Use	Units	Factor	Gallons/day
Curry Creek	Residential	16200	608/ unit	9,849,000
	Retail	46.6 acres	3219/ac	149,683
	Office	48.76 acres	3219/ac	156,958
	Schools	100 acres	3379/ac	337,900
	Parks	217 acres		185,580
	Unaccounted			172,900
	subtotal			10,852,021
				12,205.60 afa
Regional University				
	Residential	4223	608/unit	2,567,584
	Retail	5.33 acres	3219/ac	17,160
	Schools	20 acres	3379/ac	67,580
	Parks	50 acres		46,395
	Unaccounted			43,225
	University			2000 afa
	Subtotal			2,741,944
				5083.94 afa
Placer Ranch				
	Residential	6793	608/unit	4,130,144
	Biz Park	527 acres	3219/ac	1,696,413
	office	150 acres	3219/ac	482,850
	schools	50 acres	3379/ac	168,950
	parks	100 acres		92,790
	Unaccounted			86,450
	University			2000 afa
	Subtotal			6,657,597
				9488 afa
Lincoln Crossing				
	residential	2958	608/unit	1,798,464
	Biz Park	48 acres	3219/ac	154,512
	Commercial	58 acres	3219/ac	186,702
	Lt. industrial	38 acres	3219/ac	122,322
	Med. campus	32 acres	3219/ac	103,008
	Schools	20 acres	3379/ac	67,580
	Parks	50 acres		46,395
	Unaccounted			43,225
	Subtotal			2,522,208
				2836.80 afa
Total				29,614.34 afa

Rosla Vazquez

668.77 afa

May 2002 – Draft
City of Davis / UC Davis
**JOINT WATER SUPPLY FEASIBILITY
STUDY**

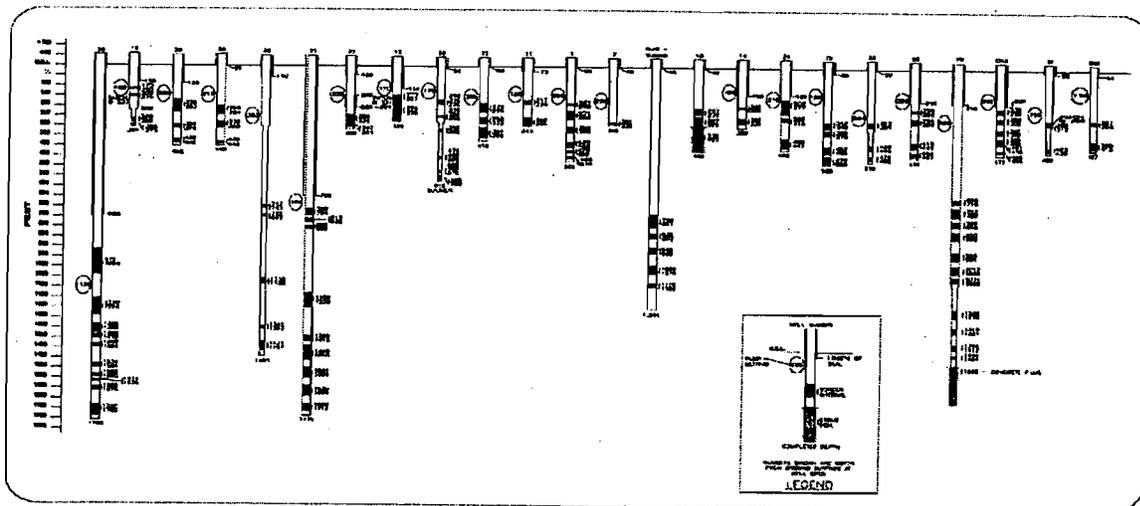
CHAPTER 1. EXECUTIVE SUMMARY

The City of Davis (Davis) and the University of California, Davis (UC Davis) currently rely solely on groundwater to meet their potable water needs. Concerns regarding groundwater quality and availability, wastewater disposal impacts, and impacts on consumers have caused Davis and UC Davis to jointly undertake a study to identify the feasibility of various future water supply alternatives. This study is funded by a grant from the State of California Department of Water Resources, and the results are presented in this report.

BACKGROUND

Two aquifers, each with unique characteristics, supply Davis and UC Davis with groundwater. Water-producing zones less than 700 feet deep are referred to as the intermediate depth aquifer. A slowly permeable clay layer confines underlying water producing zones, which are referred to as the deep aquifer. Figure 1-1 is a cross-section of Davis wells. As illustrated by this figure, four Davis wells draw water from the deep aquifer, and the remainder draw water from the intermediate depth aquifer. UC Davis obtains all of its domestic water supply from the deep aquifer.

Figure 1-1. City of Davis Well Depth, Screen Interval, and Pump Settings



Previous water supply planning activities by Davis have concluded that the city should drill new deep wells to obtain water with preferred water quality characteristics, and investigate supplemental surface water supplies. UC Davis has also identified the need for additional water supplies. In 1994 the Yolo County Flood Control and Water Conservation District (YCFWCWD) filed a water rights application to obtain surface water from the Sacramento River on behalf of the cities of Davis, Woodland, and Winters, and UC Davis. Recent water supply planning activities are summarized below:

- 1996 Davis completed Future Water Supply Needs Study that concluded that the city should further evaluate the adequacy of deep wells to support additional pumping and pursue the surface water rights application filed in 1994.
- 1997 UC Davis completed a Draft Water Management Plan that identified the need for additional water supplies and the desire for a high quality surface water supply.
- 1999 Davis and UC Davis jointly completed a Deep Aquifer Study. This study concluded the deep aquifer was highly confined, contains water that is roughly 8,000-17,000 years old, and may not be a sufficiently reliable source to satisfy future water supply needs of both Davis and UC Davis.
- 2000 Davis and UC Davis agreed to work together to implement water supply projects. Davis and UC Davis jointly received a grant from the State of California to fund the current Water Supply Feasibility Study to further evaluate the feasibility and cost of various surface and ground water supply options.

In recent years a number of Davis intermediate-depth wells have been removed from service due to water quality problems, including high concentrations of total dissolved solids, nitrates, iron, manganese, and selenium. These problems have caused Davis to drill additional wells into the deep aquifer, which in turn has heightened concerns regarding the long-term reliability of the deep aquifer. In summary, Davis faces a number of water supply challenges including:

- Water quality concerns
- Concerns regarding the long-term reliability of the deep aquifer
- Inability to replace old wells on small sites
- Difficulty of finding new well sites
- Inability to provide well-head treatment on small sites
- Regional subsidence concerns

By relying on water from the deep aquifer, UC Davis has avoided some of the water quality problems that Davis has experienced; however, UC Davis also faces a number of water supply challenges including:

- Providing for future growth in demands
- Concerns regarding the long-term reliability of the deep aquifer
- Water quality concerns regarding future drinking water standards

STATEMENT OF PROJECT OBJECTIVES

The overall objective of this investigation is to develop a plan to provide a reliable source of high quality potable water to Davis and UC Davis that meets all regulatory requirements and results in the lowest overall cost to the consumer.

The following specific objectives are designed to achieve the overall objective stated above:

Drinking Water Quality. The water supply must meet current and anticipated primary and secondary drinking water standards established by the U.S Environmental Protection Agency (EPA) and the California Department of Health Services (DHS). Primary drinking water standards are established to protect public health. Secondary standards are established to protect the aesthetic quality of the water.

Reliability. The water supply source and the water treatment and delivery system must consistently meet the projected water demands for Davis and UC Davis. Water supply, and treatment and transmission facilities should be capable of meeting 110 percent of projected peak hour demands to provide for maintenance and unforeseen facility outage.

Wastewater Quality Objectives. Constituents in the water supply should not cause wastewater discharges by Davis or UC Davis to violate current or anticipated National Pollutant Discharge Elimination System (NPDES) permit requirements. In addition, constituents in the water supply should not inhibit the reuse of wastewater effluent produced by the Davis or UC Davis wastewater treatment plants for irrigation, wetlands, or similar reuse options.

Environmental Impacts. Construction, operation, and maintenance of the proposed water supply treatment and delivery facilities should not adversely impact the environment.

Implementation. Davis and UC Davis must be confident that the selected alternative can be implemented in a timely manner to ensure that water service requirements of all customers can be satisfied.

Impacts on Consumers. Consumer cost impacts should be minimized by selection of an appropriate supply source.

EXISTING WATER SYSTEMS

Davis

The Davis water system service area includes the area within the city limits and adjacent areas such as Willowbank and El Macero. As of 2002 the service area has a population of approximately 66,000. Water is supplied from 21 active groundwater wells. The majority of these wells draw water from intermediate depth aquifer, however the three newest wells draw water from the deep aquifer). Water is distributed to customers through about 175 miles of 4 through 14-inch diameter pipelines. The distribution system contains a 200,000 gallon elevated storage tank near Elmwood Drive and Eighth Street, and a four million gallon (MG) ground-based storage reservoir currently under construction along John Jones Road, adjacent to Sutter Davis Hospital.

In recent years, a number of intermediate depth Davis wells have been removed from service due to water quality problems. Table 1-1 identifies reasons why specific wells were removed from service.

Table 1-1. Summary of Davis Wells Recently Removed from Service

Well Number	Years in Service	Status	Year Taken Out of Service	Reason
10	28	Destroyed	1988	High TDS & low production
16	33	Destroyed	1998	Nitrate exceeds standard
17	34	Destroyed	1994	High TDS & low production
18	31	Out of Service	2001	Nitrate exceeds standard

UC Davis

The UC Davis water service area consists of about 5,200 acres and provides water to approximately 24,000 students and 10,000 faculty and staff. The UC Davis water system has separate domestic and utility water facilities. Water for building and laboratory use and for heating, cooling, and other “industrial” uses on the campus is supplied by the domestic water system. The utility water system supplies nonagricultural irrigation (*i.e.* campus landscape/turf irrigation). UC Davis operates six wells exclusively for domestic water supply. All wells are completed in the deep aquifer between 800 and 1,500 feet below ground surface. Water is distributed to users through about 27 miles of 2 through 16-inch diameter pipelines. The distribution system includes a 200,000 gallon elevated storage tank and a 1.5 MG underground reservoir. A 300,000 gallon ground-based storage reservoir is currently under construction.

West Sacramento

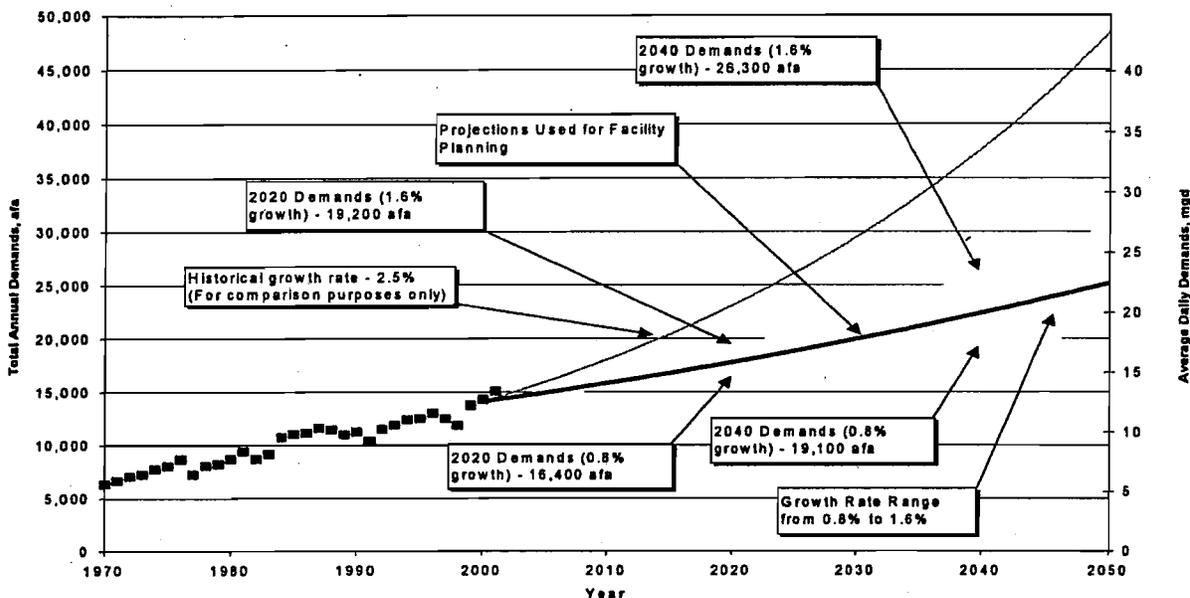
A potential future water supply source is water from the Sacramento River, treated by the City of West Sacramento (West Sacramento) water treatment plant. The West Sacramento water treatment plant was constructed in 1988. The plant currently has a nominal capacity of 24 million gallons per day (mgd). Improvements are currently under construction to increase the nominal capacity of the treatment plant to 42 mgd. Construction of these improvements is to be completed by April 2004. At a later date West Sacramento intends to expand the nominal capacity of the treatment plant to 60 mgd, which is expected to be sufficient to satisfy West Sacramento’s demands at build-out of the City.

WATER DEMAND PROJECTIONS

Davis

Historical Davis water production and use patterns were used to estimate future water demands. For the past 30 years water demands have increased at a rate of about 2.5 percent annually. For the purpose of this investigation, a future annual water demand growth rate of 0.8-1.6 percent has been assumed. The middle of the range (*i.e.* 1.2 percent) was used for facility planning. These projections assume that measures will be implemented to achieve a 20 percent reduction in water demands from historic levels, in conformance with the adopted City Urban Water Management Plan. City of Davis historic and projected future water demands are shown in Figure 1-2.

Figure 1-2. City of Davis Historic and Projected Future Water Demands

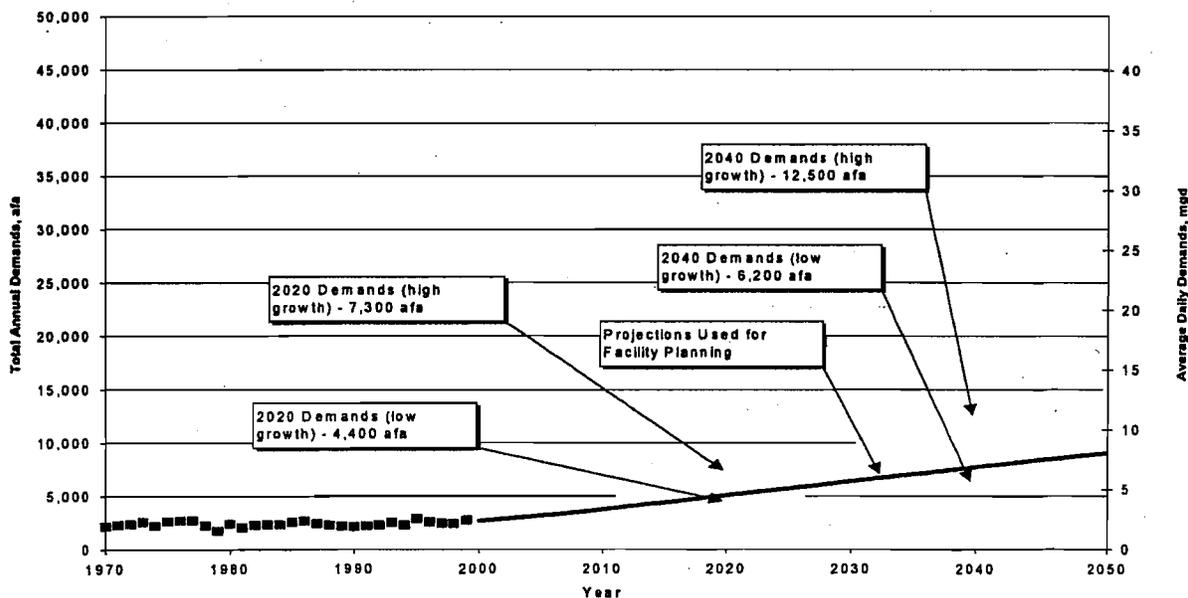


As indicated in Figure 1-2, Davis' total annual water demands are projected to increase from about 15,000 acre-feet in 2001 to between 19,100 and 26,300 acre-feet by 2040.

UC Davis

Future UC Davis water demands were estimated based on a review of historical water production and current development plans. These historic and projected future water demands are shown in Figure 1-3.

Figure 1-3. UC Davis Historic and Projected Future Water Demands



As indicated in Figure 1-3, UC Davis total annual water demands are projected to increase from about 3,000 acre-feet in 2001 to between 6,200 and 12,500 acre-feet by 2040.

POTENTIAL WATER SUPPLY SOURCES

Three primary water supply sources are potentially available to Davis and UC Davis: the intermediate depth aquifer, the deep aquifer, and surface water from the Sacramento River. The quality and availability of water from each source are discussed below.

Intermediate Depth Aquifer

The intermediate depth aquifer is considered to extend from about 200 feet to 700 feet below the ground surface. Most of the Davis intermediate depth wells are completed between 200 and 600 feet below the ground surface.

Water Quality. Water from the intermediate depth wells is generally very hard and high in total dissolved solids (TDS). Nitrate levels are close to the drinking water limit in several wells, and several Davis wells have been abandoned due to high nitrate concentrations. Boron levels are high enough to adversely affect sensitive plants. Arsenic levels are below the new national standard. Chromium-6 levels may exceed future drinking water limits. Selenium concentrations are below drinking water limits, but are sufficiently high to cause discharge limit concerns at the City's wastewater treatment plant. The intermediate depth aquifer has experienced contamination in the Davis area from petroleum-based contaminants, solvents and other dry cleaning chemicals, chlorinated hydrocarbons, and less hazardous contaminants such as nitrate.

Availability. Although water levels in the intermediate aquifer are impacted by drought conditions, the aquifer has historically fully recovered following drought periods. Availability of water from the intermediate aquifer is not a concern at the present level of withdrawal.

Deep Aquifer

The deep aquifer is considered to be located between about 700 and 2,700 feet below the ground surface. Deeper aquifers (greater than 2,700 feet below ground surface) are composed of marine sediments and are saline. The Davis deep wells are completed between 1,490 and 1,800 feet below the ground surface. UC Davis deep wells are completed between 800 and 1,470 feet below the ground.

Water Quality. Water from the deep aquifer has moderate levels of hardness and total dissolved solids. Arsenic levels vary between wells, with the highest concentrations slightly below the new national drinking water standard. Boron concentrations in deep wells are similar to the concentrations in intermediate wells, and are high enough to adversely affect sensitive plants. Available information indicates that nitrate, chromium-6, and selenium are not problematic constituents.

Availability. Recent studies of the long-term quality and yield of the deep aquifer indicate that the reliability of this aquifer could be at risk if both Davis and UC Davis rely on it as their only source of supply.

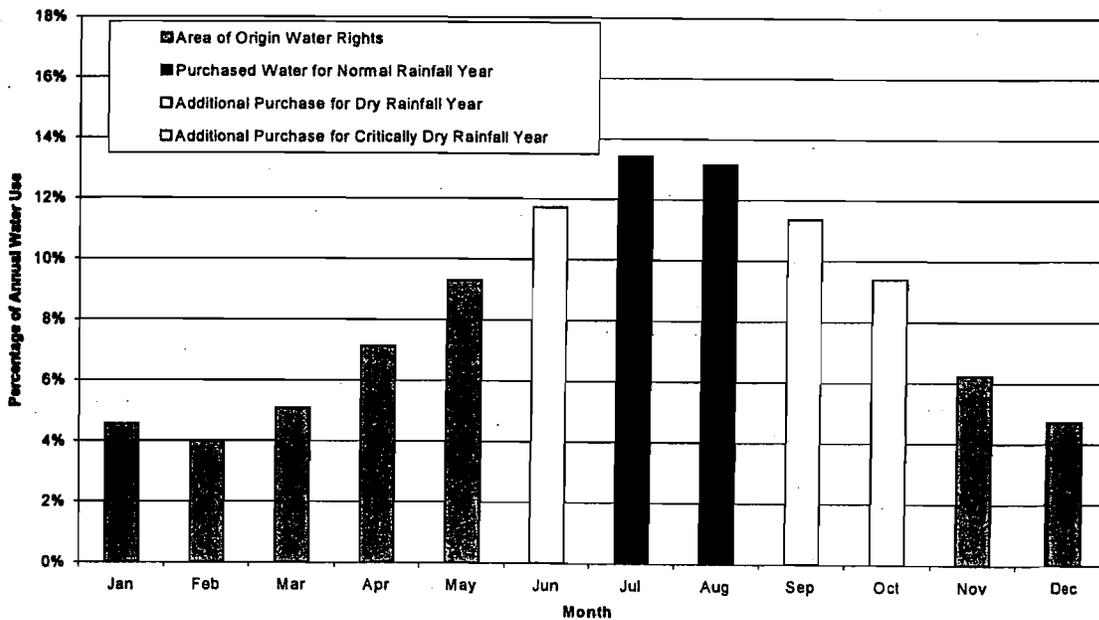
Sacramento River

Water Quality. Sacramento River water is low in hardness and TDS. Concentration of regulated inorganic and organic chemicals in Sacramento River water at the West Sacramento treatment plant intake are generally below detection limits, and the untreated water has consistently met all drinking water standards with the exception of turbidity and coliform bacteria. Sedimentation, filtration, and disinfection during the treatment process remove turbidity and bacteria and insure compliance with all drinking water standards. Trace concentrations of unregulated organic wastewater contaminants are known to be present in many untreated surface waters. Regulation of these constituents is an emerging issue. Treatment process such as activated carbon filtration may be necessary in the future to comply with new regulations.

Availability. In October 1994, the YCFCWCD filed a water rights application under the area of origin statutes for appropriation of surface water from the Sacramento River on behalf of Davis, UC Davis, and other entities in Yolo County. Davis and UC Davis continue to pursue rights under this application to divert up to 20,000 acre-feet per year (Davis) and 10,000 acre-feet per year (UC Davis) of water from the Sacramento River.

Assuming that this water rights application is perfected, and the State Water Resource Control Board (SWRCB) issues a water rights permit, water could be diverted under this permit application during most months in a normal rainfall year as shown in Figure 1-4. During dry or critically dry years, there would be additional months when water would not be available under area-of-origin water rights.

Figure 1-4. Availability of Water Rights Water



Water could be purchased from an existing upstream water rights holder when water is not available under this area-of-origin permit application.

PROJECT ALTERNATIVES

Seven potential water supply alternatives are identified and analyzed in this study. Two of the alternatives would rely on groundwater only; three of the alternatives would integrate surface water into a conjunctive use program with groundwater; and two of the alternatives would rely on surface water only to supply all water demands of Davis and domestic water demands of UC Davis. These seven alternatives are summarized below.

Groundwater Only Alternatives

Alternative 1 – All demands would be supplied with groundwater, entirely derived from the deep aquifer by 2040. This alternative represents a continuation of the current long-range water supply policy and plan for both Davis and UC Davis.

Alternative 2 – All demands would be supplied with groundwater from both intermediate and deep aquifers, using wellhead treatment on intermediate depth wells as required to meet water quality objectives.

Conjunctive Surface Water/Groundwater Use Alternatives

Alternative 3 – Available treatment capacity at the West Sacramento water treatment plant at Bryte Bend would be used to supply treated surface water. Remaining demands would be satisfied with groundwater.

Alternative 4 – Available treatment capacity at the West Sacramento water treatment plant at Bryte Bend would be used to supply treated surface water to meet demands and to inject into the underlying groundwater aquifer. Remaining demands would be satisfied with groundwater that has been extracted from groundwater storage, or with native groundwater.

Alternative 5 – Treatment capacity of the West Sacramento water treatment plant at Bryte Bend would be increased to supply treated surface water to meet average-day and most of maximum-day demands. Groundwater would be pumped as needed to meet the remaining demands.

Surface Water Only Alternatives

Alternative 6 – Demands would be supplied using treated surface water from the West Sacramento water treatment plant at Bryte Bend.

Alternative 7 – Demands would be supplied using treated surface water from a new Sacramento River diversion and a new water treatment plant.

SCREENING OF ALTERNATIVES

Potential water supply sources and project alternatives were screened with regard to how well they would meet the specific project objectives (water quality considerations, reliability, wastewater disposal impacts, potential environmental impacts, difficulty of implementation, and

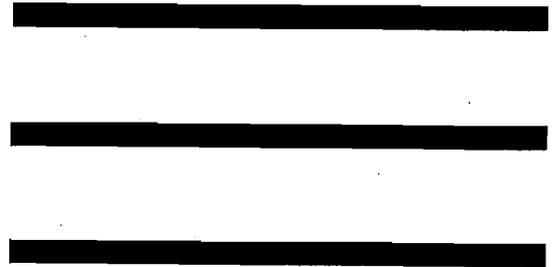
impact to consumers), as well as estimated total annualized costs. Total annualized costs represent the estimated total annual cost of constructing and operating community water supply facilities, plus the estimated total annual consumer cost of facilities such as water softeners within the City of Davis (based on survey data). Table 1-2 summarizes this screening process.

Screening Process Conclusions

Groundwater Only Alternatives. Alternative 1 (continuation of current long-term City of Davis policy of transition to, and current UC Davis policy of, reliance on groundwater from the deep aquifer) has the lowest projected total annualized cost of any of the alternatives. The major disadvantage of this alternative is that the deep aquifer may not be capable of supplying the long-term needs of both Davis and UC Davis. Other disadvantages are that individual wells may require well-head treatment facilities to remove specific constituents such as arsenic, iron, or manganese; that suitable new, larger well sites must be obtained to accommodate well-head treatment facilities; and that the boron concentrations would continue to be sufficiently high to adversely impact vegetation.

Alternative 2 (which includes the use of reverse osmosis well-head treatment on intermediate wells) has the second lowest projected total annualized cost. Under this alternative Davis would rely on water from the deep aquifer, and water from the intermediate depth aquifer treated by reverse osmosis to insure compliance with primary and secondary standards. UC Davis would continue to obtain all of its domestic water supply from the deep aquifer, so many of the disadvantages of Alternative 1 would also be applicable to UC Davis water supply under this alternative. The major disadvantage of this alternative is that reverse osmosis well-head treatment would produce a brine stream that would make disposal difficult and potentially costly.

Table 1-2. Project Alternatives Screening

The table content is redacted with three thick black horizontal bars. The first bar is at the top, the second is in the middle, and the third is at the bottom of the table area.

Conjunctive Use Alternatives

Alternative 5 (supplying base water demands with surface water from West Sacramento's water treatment plant at Bryte Bend and supplying peak demands with deep aquifer groundwater), would have the lowest capital and lowest total annualized costs of the three conjunctive use alternatives (Alternatives 3, 4, and 5). In addition, during summer months Alternative 5 would provide a water supply with a lower concentration of dissolved minerals than Alternatives 3 and 4. Therefore Alternative 5 is the preferred conjunctive use alternative. Alternative 5 also has several advantages over Alternatives 1 or 2, including that it would provide a water supply with a lower concentration of dissolved minerals and a more reliable dual source water supply.

The disadvantage of Alternative 5 (in addition to being more costly than Alternatives 1 and 2) is that to achieve its implementation would require approval of the pending Davis and UC Davis area-of-origin water rights applications and required water transfers, as well as an interagency agreement with West Sacramento to wheel and treat surface water to Davis and UC Davis service areas.

Surface Water Only Alternatives

The two surface water only alternatives (Alternative 6 and 7) would have significantly higher capital and total annualized costs than the preferred conjunctive use alternative (Alternative 5) while providing a water supply with only a slightly lower concentration of dissolved minerals. In addition, under Alternatives 6 and 7 surface water would be the sole water supply source. The reliability of this single source could be impacted by drought conditions or by future environmental restrictions.

Recommendations From Screening Process

Alternative 1 and 5 are considered to be the best alternatives. but water quality, water availability, or institutional issues could impact the suitability of either of these alternatives. It is thus recommend that Davis and UC Davis maintain flexibility in their long-term water supply planning by adopting the following general course of action:

- In the immediate future, Davis should continue the transition to, and UC Davis should continue the practice of, relying on water from the deep aquifer (Alternative 1). The deep aquifer should be monitored for signs of groundwater overdraft, and water quality constituents should be closely monitored with respect to current and future drinking water quality criteria and wastewater discharge permit requirements.
- Davis and UC Davis should pursue Alternative 5 by negotiating interagency agreements, preparing environmental documentation, and pursuing State Water Resource Control Board approval of their pending area-of-origin surface water rights applications.

FINANCIAL ANALYSIS

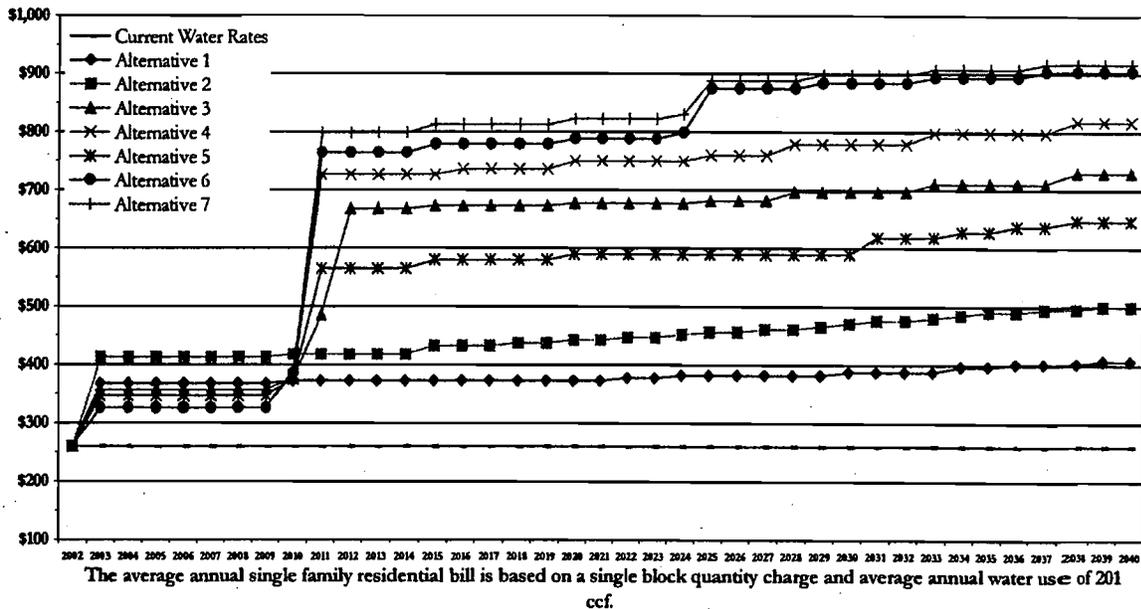
A financial analysis was completed to estimate the potential impact of each alternative on Davis water rates and capacity charges. The state budgetary process funds UC Davis expenditures, so the financial analysis did not include UC Davis.

This analysis was based on the following assumptions:

- Large capital costs of major new facilities, such as surface water treatment, transmission, or storage facilities, would be financed using bonds. Costs for new wells or wellhead treatment, which are significantly smaller, would be funded on a pay-as-you-go basis.
- The allocation of capital costs between current ratepayers and new development is based on the proportional benefit received by each from the project facilities whose capital costs are being allocated. Over the study period (2002-2040) approximately 30 percent of the design capacities benefit new development, and the remainder benefits all ratepayers.
- All costs and resulting rates are in 2002 dollars. While costs and rates will be subject to inflation, cost and rates presented herein do not assume a rate of inflation so this information can be evaluated from the perspective of a current ratepayer.

Figure 1-5 shows projected impacts of the project on single-family average annual water bills. Alternative 1 is the current policy direction, and rates would have to be raised to at least this level if the capital improvements program is to be supported solely by water rates and capacity fees. As indicated by Figure 1-5, in 2020 the estimated annual water bill would be roughly \$370 under Alternative 1, and about \$590 under Alternative 5. In 2001 the state-wide average water bill was \$370.

Figure 1-5 Projected Single Family Average Annual Water Bill, 2002 - 2040



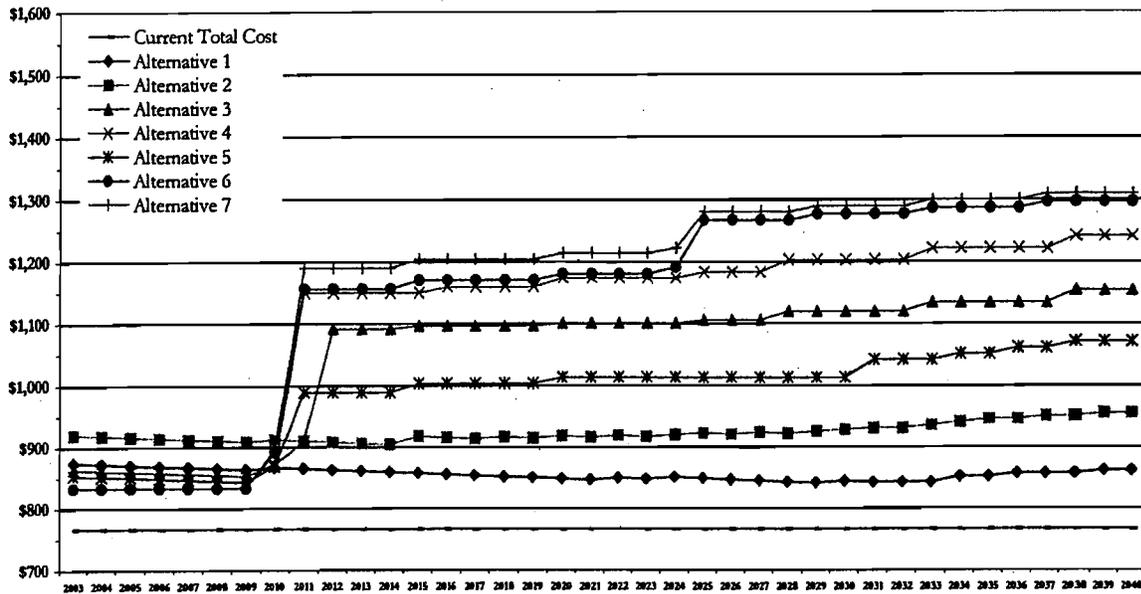
There are many costs incurred by local water users that are often not recognized. The costs associated with using water with high levels of total dissolved solids (TDS) include the purchase of bottled water, water softening or treatment systems, and the replacement or repair of plumbing, water heaters, or water-using appliances caused by scaling and/or deterioration. To mitigate these problems, most consumers purchase home water softening units and bottled water, use more cleaning agents, and replace water heaters, household plumbing, and water-using appliances more frequently than would be necessary if the water supply had lower hardness and TDS. Table 1-3 shows the estimated average annual consumer cost per Davis household of using water with various levels of TDS. These costs reflect the fact that all consumers do not use water softeners or bottled water (e.g. since about 41 percent of Davis residents use water softeners, the average annual cost per resident is 41 percent of the cost if all residents used water softeners.) A TDS level of 100 mg/L represents Sacramento river water, 400 mg/L represents water from the deep aquifer, and 700 mg/L represents water from the intermediate aquifer. (As Table 1.3 indicates, expenditures for bottled water are relatively unaffected by changes in TDS concentrations.)

Table 1-3. Estimated Average Annual Consumer Costs per Household, dollars

Item	TDS Level, mg/L		
	100	400	700 (Current Situation)
Bottled/Filtered Water	203	205	207
Water Softening System	66	106	133
Water Heater	35	43	50
Faucets/Plumbing	24	25	27
Clothes Washers	35	42	49
Dish Washers	29	35	41
Total per Household	392	456	507
Davis Total (million dollars)	5.10	5.93	6.59

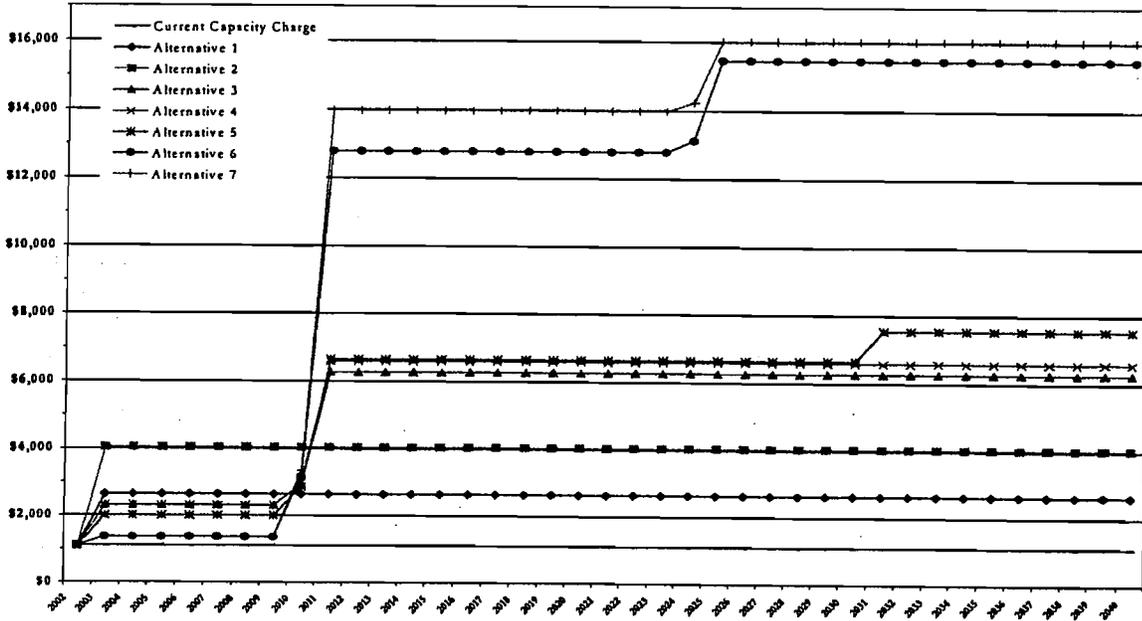
Figure 1-6 shows the projected single family average annual total costs of each water supply alternative. These costs are the sum of the estimated average annual water bill and the estimated annual consumer cost under each alternative. As indicated by Figure 1-6, in 2020 the estimated average total cost would be roughly \$850 annually under Alternative 1, and about \$1010 annually under Alternative 5.

Figure 1-6 Projected Single-Family Average Annual Total Cost – Water Purchase and Consumption, 2003 – 2040



As indicated previously, the allocation of capital costs between current ratepayers and new development is based on the benefits received from each from the capital projects whose costs are being allocated. Over the study period (2002-2040) approximately 30 percent of the project capacity benefits new development. Figure 1-7 shows projected capacity chargers per EDU under each alternative, based on the assumption that 30 percent of the cost of each project will be paid by new development. As indicated by Figure 1-7, in 2020 the projected capacity charge per EDU would be roughly \$4,000 under Alternative 1, and about \$6,680 annually under Alternative 5. This cost allocation may be adjusted to future City Council direction or policy.

Figure 1-7. Projected Capacity Charge Per EDU, 2002 – 2040



RECOMMENDED IMPLEMENTATION PLAN

A detailed plan to implement this recommended course action plan summarized in Table 1-4. This plan involves the following types of actions:

Deep Aquifer and Water Quality Monitoring

Consistent with its previously adopted policy direction, Davis is gradually transitioning from reliance on intermediate depth groundwater to relying primarily on water from the deep aquifer. UC Davis currently obtains all of its domestic water supply from the deep aquifer. There are concerns that the deep aquifer may not have sufficient yield to supply the long-term needs of both Davis and UC Davis. Furthermore, drinking water standards for constituents such as arsenic may impact the reliability of this source. In light of these concerns, the systematic groundwater investigation and associated monitoring programs summarized in Table 1-4 is recommended.

Legal, Environmental & Engineering Implementation Steps

The proposed water supply action plan presented in Table 1-4 would require continuing action over the next decade. This overall process would require expenditures of significant resources by both Davis and UC Davis. As indicated in Table 1-4, it is suggested that annual progress reports be prepared for the governing bodies of both agencies, and that authorizations to proceed with subsequent implementation steps be obtained annually or upon reaching major project milestones.

Other recommended future water supply planning legal, environmental, and engineering steps include:

- Developing draft interagency agreements
- Developing draft agreement for purchase of surface water
- Negotiating land and right-of-way purchases
- Conducting environmental impact studies
- Obtaining approval of surface water rights permits and water transfer
- Adopting funding plans
- Designing surface water treatment, transmission, and storage facilities/obtaining permits required for construction

Table 1-4 presents a recommended schedule for future water supply planning legal, environmental, and engineering steps. Initially it is recommended that Davis and UC Davis begin negotiations with the City of West Sacramento regarding wheeling water through the West Sacramento water treatment plant. Other initial recommended steps include beginning negotiations with a senior upstream water rights permit holder for the purchase of summer water, and negotiations regarding land and right-of-way purchases. These initial steps should be completed prior to initiating subsequent steps, including the preparation of an environmental impact report.

Capital Improvements

Both Davis and UC Davis have adopted long range capital improvement plans that involve the abandonment and replacement of problematic wells. It is assumed that in the immediate future Davis would continue the transition to, and UC Davis would continue the practice of relying on, water from the deep aquifer. In the short term this would afford both agencies some flexibility. In the event that surface water facilities are either not constructed or delayed, system demands can be fully supplied by groundwater, if the deep aquifer has sufficient yield to do so. A recommended capital improvements plan is presented in Table 1-4.

ANNUAL IMPLEMENTATION PLAN COSTS

Estimated annual costs of implementing the steps outlined in this plan are summarized in Table 1-5.

Table 1-4. Recommended City of Davis and UC Davis 10-Year Water Supply Action Plan

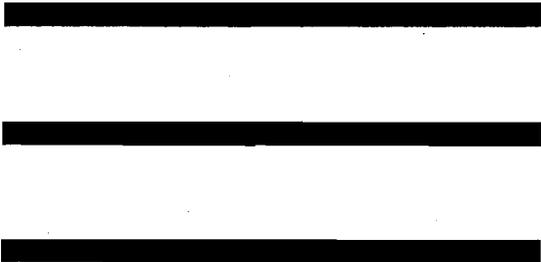
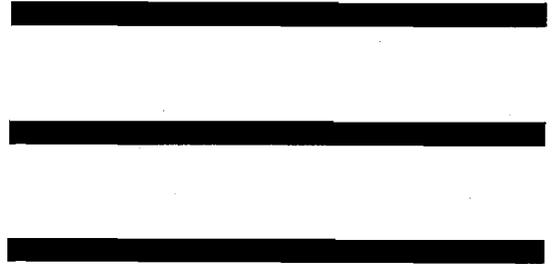
The table content is redacted with three thick black horizontal bars. The first bar is at the top, the second is in the middle, and the third is at the bottom of the table area.

Table 1-5. Estimated Annual Costs of Implementation Plan

The table content is redacted with three thick black horizontal bars. The bars are positioned at approximately the top, middle, and bottom of the table's vertical extent, completely obscuring any data or text that might have been present.

ROBBI S. KEIL
CONSULTANT
40 STODDARD COURT
DANVILLE, CA 94526
OFFICE & FAX: (925) 743-9075
E-MAIL: airkeil@sbcglobal.net

May 9, 2006

Mr. William D. Kopper
Law Office of William D. Kopper
417 E Street
Davis, CA 95616-4132

SUBJECT: REVIEW OF AIR QUALITY ANALYSIS OF THE PLACER VINEYARDS SPECIFIC PLAN REVISED DRAFT ENVIRONMENTAL IMPACT REPORT (2006)

Dear Mr. Kopper:

As you requested, I have reviewed the air quality analysis for the Placer Vineyards Specific Plan (PVSP) Revised DEIR. My comments may be found below.

CONSTRUCTION

Mitigation Measures

Construction impacts were found to be significant and unavoidable, even after mitigation. After implementation of the proposed mitigation measures, what amount of emissions will remain? No quantification of the mitigation measures has been provided, so the extent of the significant impact is not known.

How will the project assure that PCAPCD Rule 228-303, which limits PM₁₀ levels to below 50 µg/m³, will be followed? Will the project install airborne particulate sampling systems? Please describe where these monitors will be located. Is airborne particulate sampling a part of the wind erosion monitoring program described in mitigation measure 4.8-1a. If not, particulate sampling should be included in the mitigation monitoring plan. What plans would be in place if an exceedance is measured? Also, if airborne sampling is not a part of the wind erosion monitoring program, please describe what will be performed as part of wind erosion monitoring.

Q

Emissions

According to Appendix J of the DEIR, project average daily construction emissions were calculated using the URBEMIS2002 model results and then dividing by nine. The project emissions in Table 4.8-7 are described in the DEIR as worst-case emissions, but in Appendix J the emissions are described as an estimate of average emissions over a nine-

R

year time frame. Will all of the grading activities occur within this nine-year time frame? Please clarify the inconsistency and explain the project phasing. The project would be built over a 20 to 30-year time frame¹ and so worst-case daily emissions could be a combination of construction and operational emissions. For a project as large as PVSP, perhaps the impacts of the project would be easier to understand if more emissions information would be provided to show what the impacts from the project could be as it is developed (i.e., worst-case emissions for each year).

What facilities are considered as off-site infrastructure? Does this only include the road improvements, sewer and water lines, and wastewater treatment plants? As stated in the DEIR, the air quality impacts are likely to be significant and unavoidable, but no information has been provided to quantify these emissions. How would the magnitude of these emissions compare to construction emissions on the project site? The project needs to quantify construction emissions for the off-site infrastructure; otherwise, the public will not have been given enough information about the potential significant impacts of this project in its entirety. Sacramento Metropolitan Air Quality Management District (SMAQMD) has developed a road construction emissions model that will select different numbers and types of construction vehicles depending on the project type selected, the length of the project, and maximum acreage disturbed per day.²

R cont.

Health Impacts

The road widening and water line construction along Watt Avenue would pass in front of a high school and other residential areas as well as residential areas adjacent to Pfe Road. The air quality analysis did not address the potential impacts of the project construction on the students or residential area.

With construction on the project site and infrastructure targeted to last 20 to 30 years, diesel emissions from construction exhaust would not be temporary for this project. Besides being a carcinogenic health risk, diesel exhaust also poses a chronic (annual exposure) health risk to the respiratory system. The potential health risk from construction activities to sensitive receptors in the surrounding area and in the portions of the project site as it becomes operational should be quantified.

S

OPERATIONS

Mitigation Measures

The project proposes to implement many excellent mitigation measures. However, the DEIR has not provided calculations of the impact of the proposed mitigation measures on

T

¹ Quad Knopf. 2006. Placer Vineyards Specific Plan – Revised Draft Environmental Impact Report. March.

² Sacramento Metropolitan Air Quality Management District. 2004. Guide to Air Quality Assessment in Sacramento County. July.

project emissions. The DEIR states that operational emissions would result in a significant and unavoidable air quality impact even after mitigation, but the extent of the significance is not provided in the DEIR. Since the Specific Plan proposes to use off-site mitigation measures, the project should fund enough off-site emission reductions so that the combination of on-site and off-site mitigation measures reduces the air pollution impacts to below significance levels.

T cont.

Mobile Source Emissions

Emissions presented in Table 4.8-7 should include the worst-case emissions for both winter and summer emission rates. The significance threshold levels are not a function of season.

U

Carbon Monoxide Analyses

As discussed in Appendix J, the analysis of potential carbon monoxide (CO) "hotspots" used the screening methods contained in the BAAQMD CEQA guidelines document.³ However, as stated on page 37 of these guidelines, the full CALINE4 model should be used for projects that will generate over 10,000 or more motor vehicle trips per day. According to Table 4.7-14 of the DEIR, the Specific Plan will generate over 200,000 trips per day.

Furthermore, the assumptions used in the screening analysis were not necessarily conservative. Based on recommendations from the Transportation Project-Level Carbon Monoxide Protocol⁴ (CO Protocol), Appendix B Table B.11, wind direction variability (sigma theta) for coastal valley locations such as the Bay Area is greater than sigma theta for central valley locations such as southwest Placer County. The CALINE4 user's manual⁵ discusses the sensitivity of the CALINE4 model to wind direction variability. At smaller distances and parallel wind angles, smaller wind direction variability increases the predicted concentrations.

V

No information was provided that discussed the assumptions used in developing emissions input to CALINE4 from the EMFAC2002 model. This information should be included in the appendix as well.

³ Bay Area Air Quality Management District. 1999. BAAQMD CEQA GUIDELINES: Assessing the Air Quality Impacts of Projects and Plans. December.

⁴ Garza, Vincente. 1997. Transportation Project-Level Carbon Monoxide Protocol. Institute of Transportation Studies, University of California, Davis. UCD-ITS-RR-97-21. Revised December.

⁵ California Department of Transportation (Caltrans). 1989. CALINE-4 – A Dispersion Model for Predicting Air pollutant Concentrations Near Roadways. Division of New Technology and Research. June 1989.

At two of the five intersections under the existing condition, a violation of the 8-hour Federal and California CO air quality standard was predicted. Rather than dismissing these violations as conservatism in the model, a refined analysis should have been performed.

V cont.

Toxic Pollutants

According to the DEIR, the additional treatment capacity at the wastewater treatment plants would likely increase stationary source emissions and air toxics and would likely require a health risk assessment. Some quantitative analysis should be prepared as part of the DEIR to assure that the health risks would not be unacceptable before the Specific Plan is approved and the extra treatment capacity would be required to serve the increased population.

W

Another potential health risk is to sensitive receptors (residences, schools) alongside the roadway as traffic increases. For example on Watt Avenue, north of Elverta Road, traffic increases from existing conditions of 19,400 average daily traffic (ADT), to 47,000 ADT with existing plus project, cumulatively with project to 64,500 ADT, and super-cumulative with project and other projected developments to 80,100 ADT.⁶ Within this road segment residential areas and a school are adjacent to Watts Avenue. According to the California Air Resource Board (CARB) Land Use Handbook⁷, siting sensitive land uses within 500 feet of a high traffic road (50,000 vehicles per day for a rural road) is not advisable. Although the sensitive land uses already exist along Watt Avenue, the traffic increases associated with the Specific Plan development as well as other developments in the area may put the existing population at increased risk of adverse health effects.

X

Review of the URBEMIS output files indicates that the proposed project may generate 3,900 heavy-heavy and medium heavy-duty truck trips per day (230,000 trips per day x (0.9+ 0.8) /100). Depending on the distance to the nearest sensitive receptor, the number of diesel truck trips could potentially create significant adverse air toxics impacts. This has not been addressed in the DEIR.

Cumulative Impacts

As stated in the DEIR, the Placer County Air Pollution Control District has a cumulative impacts threshold of 10 pounds per day for ozone precursors. The impacts of the project would need to be reduced so that emissions of ROG and NO_x would be below 10 pounds per day. The DEIR needs to present the effectiveness of the proposed mitigation measures to calculate the additional reduction in emissions necessary. The remaining amount of emissions above 10 pounds per day will need to be reduced through funding

Y

⁶ Quad Knopf. 2006. Placer Vineyards Specific Plan – Revised Draft Environmental Impact Report. March.

⁷ California Air Resources Board. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April.

the off-site mitigation program. The current cost to reduce one ton of emissions is approximately \$14,300 per ton.⁸ The DEIR should include information about funding the off-site mitigation program.

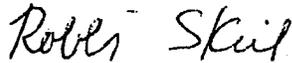
Y cont.

CONCLUSION

The air quality analysis needs to provide additional information and calculations as part of the CEQA process to inform the public and to allow for thorough review of the potential air quality impacts from the proposed Placer Vineyards Specific Plan.

Z

Sincerely,



Robbi S. Keil

Att.

⁸ PCAPCD. 2006. Personal Communication with Brent Backus, Associate Planner. May 4.

REFERENCES

Bay Area Air Quality Management District. 1999. BAAQMD CEQA GUIDELINES: Assessing the Air Quality Impacts of Projects and Plans. December.

California Air Resources Board. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April.

California Department of Transportation (Caltrans). 1989. CALINE-4 – A Dispersion Model for Predicting Air pollutant Concentrations Near Roadways. Division of New Technology and Research. June 1989.

Garza, Vincente. 1997. Transportation Project-Level Carbon Monoxide Protocol. Institute of Transportation Studies, University of California, Davis. UCD-ITS-RR-97-21. Revised December.

PCAPCD. 2006. Personal Communication with Brent Backus, Associate Planner. May 4.

Quad Knopf. 2006. Placer Vineyards Specific Plan – Revised Draft Environmental Impact Report. March.

Sacramento Metropolitan Air Quality Management District. 2004. Guide to Air Quality Assessment in Sacramento County. July.

AIR QUALITY ANALYSIS

METEOROLOGY

RISK ASSESSMENT

ROBBI S. KEIL

CONSULTANT
40 STODDARD COURT
DANVILLE, CA 94526
OFFICE & FAX: (925) 743-9075
E-MAIL: keil@pipeline.com

EDUCATION

Pennsylvania State University: M.S., Meteorology, 1984
Purdue University: B.S., Atmospheric Science, 1980

PROFESSIONAL HISTORY

Consultant, 1990-present
Woodward-Clyde Consultants, Project Scientist, 1983-1990
Aerocomp, Inc., Research Meteorologist, 1982

REPRESENTATIVE EXPERIENCE

Ms. Keil has had extensive experience in air quality modeling and permitting. Her project responsibilities have included calculation of emissions, modeling of impacts, evaluation of regulatory applicability and compliance, and preparation of application forms and supporting reports and documentation. She is knowledgeable about federal and state air quality regulations. In addition, she is experienced in the preparation of health risk assessments. She has used a number of air quality models including ISC3, CALPUFF, COMPLEX I, COMPLEX II, MESOPUFF, PAL, VALLEY, MPTER, PTLU, PTDIS, PTMAX, CALINE3, CALINE4, URBEMIS, TEM, TCM, FDM, SCREEN3, SLAB, AFTOX, and the Urban Airshed Model to estimate the impacts of different pollution sources. Specific project experience includes:

- Performed air quality modeling analysis for proposed cogeneration facility in Northern California.
- Prepared air quality section as part of EA for construction activities at San Francisco International Airport.
- Performed air quality modeling of scientific research facility in Northern California in support of a health risk assessment.
- Prepared screening health risk assessment of medical research laboratory in Northern California.
- Performed air quality modeling in support of an Application for Certification for a power plant in Southern California.
- Performed air quality analyses, including PSD analyses, for Air Contaminant Discharge Permit for several cogeneration projects in Southern Oregon.
- Performed peer review of emission calculations and of box modeling of contaminated soils and groundwater at a facility in San Francisco.
- Air quality analysis (evaluation of regulatory and ambient setting and calculation of emissions from construction) for proposed replacement of the Berryman Reservoir in Berkeley, California for EIR.
- Air quality modeling (CALINE4) of proposed improvements to the Interstate 101/85 interchange in Santa Clara County, CA.
- Air quality analysis (evaluation of regulatory and ambient setting, regulatory applicability, calculation of facility emissions, screening modeling of carbon monoxide impacts, construction impacts analysis, evaluation of odor potential) and preparation of EIR for proposed MUNI maintenance facility, LRT storage, and office building in San Francisco.

- Air quality analysis (evaluation of regulatory applicability including Federal conformity, mobile source exhaust emission calculations with EMFAC7F, CALINE4 modeling of carbon monoxide emissions from mobile sources, construction impacts analysis including toxics analysis) and preparation of EIR/EIS for proposed Embarcadero replacement project in San Francisco.
- Air quality analysis (evaluation of regulatory and ambient setting, construction impacts analysis, screening modeling of CO impacts) and preparation of EIR for proposed California State office building in Oakland.
- Compiled on-site monitoring data (emissions and meteorology) for EBMUD wastewater treatment facility in Oakland. Performed air dispersion modeling and calculated health risks associated with the facility.
- Provide emissions calculations and review application material for Authority to Construct for proposed sludge de-watering system in Redwood City, CA.
- "On-Call" with Caltrans Districts 4 and 10 for preparation of air quality analyses.
- Perform modeling of food dehydrator facility in New Mexico to evaluate feasibility of expansion.
- Performed air quality modeling of carbon monoxide emissions for alternative transportation scenarios for a proposed fairgrounds and arena site in Santa Clara County, CA.
- Air quality modeling of accidental release of hydrazine for California Energy Commission using the SLAB and AFTOX models.
- Air quality modeling (SLAB) of three accidental release scenarios of ethylene oxide from a medical equipment sterilizing facility in San Rafael, CA in support of a RMPP as required by the Fire Department.
- Air quality modeling of emissions from a medical waste incinerator in Kauai for a risk assessment.
- Air quality modeling of airborne contaminants from soil for a risk assessment for a Northern California Air Force base.
- Air quality modeling of landfill and gas recovery system in Alameda County, CA as part of a health risk assessment.
- Air quality modeling of landfill and gas recovery system in Marin County, CA as part of a health risk assessment.
- Air quality modeling of airline facility emissions in support of AB2588 health risk assessment in San Francisco, CA.
- Supported modeling efforts of canning facility emissions for AB2588 health risk assessment in Los Angeles, CA.
- Air quality modeling for support of health risk assessment for resource recovery facility in Contra Costa County, CA.
- Analysis of health risk assessment for proposed resource recovery facility near Fresno, CA.
- Calculation of construction emissions for proposed natural gas pipeline from San Joaquin County to Contra Costa County as part of EIR.
- Meteorological data preparation and supervision of air quality modeling for health risk assessment for excavation of asbestos along light rail corridor in San Jose, CA.
- Air quality modeling of hazardous waste incinerator and fugitive volatile chemical emissions in Kettleman Hills, CA.
- Air quality modeling of emissions from a resource recovery facility in Detroit, MI.

- Calculated organic emissions from storage tanks at a hazardous waste deep-well injection facility in Kern County, CA, including quantification of pollutants entering the air from accidental spills of hazardous materials.
- Preparation of AFC and air permit for resource recovery facility in San Diego, CA. Helped set up meteorological inputs to models. Set up and ran air quality models ISC, COMPLEX I.
- Computed the impacts of heavy metals associated with incineration of solid waste.
- Air quality analysis of hazardous waste incinerator in Texas.
- Review of health risk assessment and air quality permits of hazardous waste transportation facility.
- Preparation of AFC and PSD Permit and Determination of Compliance applications for 80 MWe resource recovery facility in Redwood City, CA. Wrote and oversaw preparation of PSD permit.
- Air quality permitting (AFC, ATC, and PSD) of two large (100-200 MWe) cogeneration facilities and five smaller (less than 50 MWe) cogeneration facilities in Northern and Southern California.
- Air quality modeling in support of PSD and ATC permits for a major modification of an oil refinery in the San Francisco Bay Area.
- Air quality modeling and supervision of modeling tasks for health risk analysis for research laboratories at Stanford University..
- Air quality modeling for EIR for solvent storage facility in San Jose.
- Preparation of AFC for cogeneration plant with steam used to recover oil in Bakersfield, CA. Wrote air quality sections of AFC.
- Provided guidance for air quality modeling for EIR of highway modification in California.
- Provided air quality analysis of mobile sources associated with housing projects.
- Performed statistical analyses and comparisons of meteorological data sets for use in in-stream temperature modeling.
- Analyzed meteorological data and compared to another meteorological data set as part of an air quality modeling validation study.
- Evaluated meteorological data to evaluate likelihood of migration of odors from sewage treatment plant to residential area.
- Contributed to a study of meteorological impacts on and performance measures of an urban photochemical model. The study included data preparation, statistical analyses, and other quantitative analyses of the air quality model results.

10 May 2006

TO: Bill Kopper JD

FR: Mark E. Grismer PhD
Hydrologist



RE: Review of Placer Vineyards Project Revised EIR

As requested, I have reviewed chapters 1-3 (Introduction, Summary & Project Description), and sections of chapter 4 related to hydrology, water supply, soils and wastewater of the Project Revised EIR and the associated appendices with particular focus on the proposed project impacts on site hydrology, stormwater drainage and water supply. The proposed project is one of several significant development projects either underway or in the planning stages for the greater Roseville area. It will be imperative and incumbent upon Placer, Sutter and Sacramento Counties to carefully orchestrate all of these development projects in such a fashion as to accommodate the increased traffic, water demands, aggravated drainage/flooding problems and need for wastewater treatment and disposal. Review of each Project EIR on a one-at-a-time basis in each County will miss the overall impacts, or effects of these combined projects on the landscape. In this particular case for Placer Vineyards, the proposed project faces a number of hurdles related to providing adequate drainage management so as not to adversely affect downstream areas (flood control) and water supply. The Project REIR note significant impacts in many areas that are unavoidable and a part of the Project as well as several others that are considered "mitigable" through contractor adherence to County/Roseville planning and permitting department oversight through such vehicles as the Master Drainage Plan for the Project. The proposed Project relies on "possible" water sources from the American and Sacramento Rivers that are not yet firm (e.g. no signed amendatory contract between PCWA and the USBR) and lack the infrastructure necessary to serve the Project area. Overall, the proposed development seems typical of the area. Increased development will result in the usual problems of increased water demands, less infiltration, greater drainage demands and increased traffic etc. In this case, I would think new General Plan Amendments should be put in place first before consideration of specific projects in a piece-meal fashion.

AA

1. Multiple Project Buildout Issues – As individual project buildout is undertaken, earthmoving occurs, and there are incremental changes in small drainage ways, water use and eventually wastewater and waste disposal. Generally, the EIR analyses of drainage, water demand/use and potential erosion consider the pre- and post-project conditions with the exception of some erosion control measures associated with construction activities. This can be problematic and the EIR may not adequately address the problems. For example, as urban development continues upstream of the proposed project area drainage ways and flows are altered affecting of both peak and sustained flowrates downstream, in ways that are largely unknown. These drainage flows make it into the proposed project area and previous routing modeling (HEC-RAS) efforts do not apply and storm drainage is either routed further downstream to exacerbate potential flooding or somehow contained

BB

within the project at yet to be designated detention areas. While eventually, when all development in both projects comply with their respective Master Drainage Plans and detention storage and related control measures are in place, downstream flooding may not occur, there may be a 5-10 year interim period of problematic flooding. Similarly, if individual projects indicate reliance on groundwater as an interim water supply until project buildout or sufficient water supply infrastructure is put in place, then it is easily conceivable that multiple project developments may be drawing groundwater at the same time thereby diminishing that resource. Finally, many of the projects in the area have a 20-30 year time horizon during which global warming effects on timing and magnitude of streamflow, rainfall and snowmelt are anticipated to have more dramatic effects on drainage and water supply calculations than those based on past data. For example, future flood reservoir storage is anticipated to be limited by greater winter rains and earlier snowmelt, which then affects available water supplies.

BB cont.

2. Drainage Issues - With urban development, stormwater drainage is generally accelerated and exacerbated (i.e. greater and more rapidly peaking runoff flows) as a result of decreased watershed infiltration of rain through paving and building construction. This is already evident at the Project site in that upstream development has changed Curry Creek from an ephemeral to perennial stream. Dry Creek flows have also been altered through upstream development, though it appears that the proposed Project includes only a small part of the Dry Creek watershed area. As project development is completed it may be expected that use of the recycled treated wastewater may result in additional low flows in the Project area streams. Perennial low flows, or base flows then become part of the drainage flows requiring downstream routing or temporary storage. Several small detention storage ponds are identified in the Project area that result in about 25 AF of storage before Curry Creek flows discharge across the Placer-Sutter county line. The flood routing simulations noted minute increases in water surface elevations of 0.01-0.02 ft (~3 mm, too little to measure) presuming the necessary storage is developed. Master Drainage Plans and the routing models presume that the needed detention storage can be constructed, but do not complete the on-site investigations necessary to make sure that the soils/geology of the proposed sites are actually amenable to pond construction and stabilization. For example, developing 25 AF of detention storage adjacent to Curry Creek will require in excess of 50,000 cubic yds of earth removal and additional grading for berms and side-slopes. This extent of land grading alone may be affected by local conditions and require a DEIR on its own as well as a feasibility study. Finally, with continued upstream development, it is only reasonable to expect that increased flooding of the evermore urbanized Natomas Basin floodplain through the Sankey Gap will occur either during interim project construction or as a result of lack of coordination between drainage from the multiple upstream projects (see #1) by the end of project completion. I would expect Sutter County to register greater concerns than their brief letter from July of 1999. The Project EIR does not take these kinds of elements into account when evaluating impacts. Needless to say, I would not want to be a downstream homeowner in the south Sutter, north Sacramento County area when the possibility of regular flooding is typical.

CC

3. Water Supply - Water supply for the greater Sacramento/Roseville area is of ongoing concern as the local population and water demand increases and shallow groundwater

DD

resources are less available. The proposed Project requires some 6000 AF/yr for 6-8 years of initial construction followed by an anticipated demand of ~11,500 AF/yr at or near full buildout. Present estimated groundwater use in the west Placer county area is 65,000-75,000 AF/yr resulting in relatively stable groundwater depths. The actual quantity is unknown, nor how much of this estimated use applies to the proposed Project area. By drawing Project water supplies from the American and Sacramento Rivers, anticipated Project demand of groundwater is expected to occur only during "dry" years, while lack of withdrawals during wetter years is assumed to be allowing aquifer "recharge" or "banking" for later withdrawals. However, lack of withdrawal and relief of pumping "pressure" on the groundwater system does not necessarily translate into equivalent available water in the future as groundwater pumping from other projects adjacent to Placer Vineyards may have already drawn some water and other water moves elsewhere within the aquifer system.

While the DEIR identifies possible water supplies from the Rivers and PCWA as a water purveyor, it is not quite clear that these water resources truly exist for delivery, either now or well into the future and that presently there is no infrastructure available by which to deliver the water to the Project. In July of 1999, even the City of Roseville noted that reliance on use of their water supply pipe with a capacity of 10 mgd may be less than prudent. The 6000 AF/yr for 6-8 years initial Project requirement corresponds to more than half of the 10 mgd capacity of the Roseville delivery pipe – this leaves little margin for error resulting from spillage, infrastructure repairs/maintenance, or much less, increased demands during drought periods affecting Roseville, the WRSP and Placer Vineyard project areas during this initial period.

Speculative water supply infrastructure and supplies does not lend confidence towards true water availability for the Project. Moreover, the Placer Vineyards project is considered alone rather than as a part of the greater area development either proposed, planned or underway. In part of the analysis of water supply impacts on CVP operation, the larger value of 35,000 AF/yr demand is employed to represent the possible water right to be exercised by PCWA from the USBR and shown to have negligible effect in the PROSIM modeling. This is not at all surprising given that it represents such a small fraction of the total water in the CVP, but is not convincing in terms of water actually being available for the Project. While PCWA raises concerns about actually accessing the water it considers in their purview, they note in July, 1999, that as yet they lack direct access, permits, agreements, contracts and guarantees that they can actually deliver said water. Later in 2006, PCWA indicates that they can make available some 86,837 AF/yr of water for western Placer County use from which the Project can presumably draw. A more transparent analysis in the EIR should include a table of some form perhaps similar to Table 1 below that includes the water demands/sources of all the adjacent projects proposed in the greater Sacramento-Roseville area. From the rough calculations in Table 1, it appears that about 5000 AF/yr more than the 35,000 AF/yr expected from the CVP is required for the region. From such a table, one could more readily determine frequencies of water delivery restrictions, drought impacts and demands on groundwater resources as used to make up the difference in surface water supplies and accumulated demand. There seems to be a matter of "putting the cart before the horse" (or is a chicken/egg dilemma) here with respect to proposing a development project before water resources are secure.

DD cont.

Table 1. Cumulative water demands in greater Sacramento-Roseville area from planned and anticipated development projects.

Adjacent Projects	Direction		Anticipated		Parks/Greenbelts		Estimated	
	Begin Date	Project Area (ac)	Area (ac)	Water use ^a (AF/yr)	DU	Domestic ^b (AF/yr)	Total (AF/yr)	Source? Reliability?
<i>Projects with approved Plans</i>								
Lincoln Crossing		North	1070		2958	1325		
Lincoln 270 (light commercial)		North	280		100	22	45	
Dry Creek Community Plan		East						
Riolo Vineyards		S. East	319		805	361		
Morgan Place		S. East	12		91	41		
Silver Creek		S. East	29		79	35		
W. Roseville SP	2006	East	3150		8500	3808		
		Subtotal	4860		5615	2807		
<i>Projects designated for development</i>								
Sierra Vista SP		N. East	1900		10000	4480		
Creekview SP		N. East	570		2160	968		
		Subtotal	2470		5448	2724		
<i>Projects currently obtaining General Plan amendments</i>								
Regional Univ. & Comm. SP	2008	N. East	1136		4387	983	1965	
Placer Ranch	2008	N. East	2213		6793	3043		
Elverta SP	2008	South			4950	2218		
<i>Projects under consideration</i>								
Curry Creek CP	2012	N. East	5200		16200	7258		
S. Sutter Reserve		N. East	10500		17500	7840		
Placer Vinyds. SP	2012	NA	5230		14132	6331	11500	
		Subtotal	24279		28655	14327		
		Overall Total	31609		88655	39717		

^a Presumably some of the landscaping water use can be met with recycled treated water. Use of the recycled water may have impacts on Creek summer low flows comprised primarily of WWTP discharges that require further investigation.

^b Assumes 200 gpd/DU domestic use plus 200 gpd home landscaping as an approximation, project values should be employed.

My concern here is that there is either a net greater water demand than reliable supply, or that the margin of safety between demand and supply is so small that given regular hydrologic variability (much less global warming induced greater variability) that more frequent water restrictions than desired will occur. If the water restrictions do not occur during successive "dry" years than there will be a greater demand on presumed groundwater "banked" water that does not really exist due to simple movement of groundwater along gradients to streams or rivers. This latter condition is something akin to what I understand of the current problem with gasoline prices in that there is no flexibility in the system due to demand more-or-less equaling gross supply, but exceeding available or anticipated supply. Water is a more critical resource and lack of system "flexibility" results in far greater hardship on the landowners and environment.

During multiple, successive "dry" years, streamflows in the Sacramento and American Rivers may be significantly reduced and USBR enforced water delivery cutbacks of 25-50% may occur such that the proposed Project and adjacent development areas (such as those listed on Table 1), will shift to groundwater resources in order to meet water supply demands. As a result of the smaller streamflows and lack of precipitation associated with definition of the "dry" water year, groundwater resources will also be diminished, that is, groundwater levels are likely to be deeper than otherwise. As the regional demand for groundwater grows from one "dry" year to the next, groundwater levels will rapidly decline and local streamflows may be adversely affected. Such a scenario is already underway in the lower Elk Grove area. The Water Forum recognizes such potential problems, but there is little real cumulative analysis of this problem in the Placer Vineyards REIR with the exception of developing a "well insurance" program. Such a program that compensates landowners with private wells that go dry as a result of Project pumping is of little consolation. Having owned a small farm dependent on a private well that was affected by much larger neighboring wells, it was very disconcerting to know they could pump my well dry with little penalty. Being "compensated" for the water loss would do nothing towards my domestic and farming water needs.

DD cont.

Mark E. Grismer

Professor of Hydrology and Agricultural Engineering
Department of Land, Air and Water Resources
University of California
Davis, CA 95616
(916) 752-3243

EDUCATION

- Ph.D. - Agricultural Engineering, Colorado State University (1984)
Study Emphasis: Groundwater Hydrology
- M.S. - Environmental Engineering, Oregon State University (1981)
Study Emphasis: Hydrology and Water Quality
- B.S. - Agricultural Engineering, Oregon State University (1980)
Study Emphasis: Soil and Water Science

HONORS

- Outstanding Teacher Award, Environmental Resource Sciences Major, Davis (1992)
- Mined Land Reclamation Group Graduate Fellowship, CSU
Environmental Resources Center (1983)
- ASAE Student Honor Award, Oregon State University (1980)
Honors Program, Oregon State University (1980)
- High Scholarship Graduate, Oregon State University (1980)
- Presidential Scholarship, Hamline University, MN (1976)

EXPERIENCE

- Professor*, Departments of LAWR and Biological and Agricultural Engineering, UC-Davis; 7/95-present.
- Associate Editor*, ASCE Journal of Irrigation & Drainage Engr.; 7/94-12/96.
- Master Advisor*, Hydrology; 7/94-present
- Graduate Advisor*, Hydrologic Sciences; 7/92-present
- Chair*, Hydrologic Sciences Graduate Group, UC-Davis; 7/90-6/93.
- Associate Professor*, Departments of Land, Air & Water Resources and Agricultural Engineering, UC-Davis; 7/89-6/95.

As an associate professor, I have continued work as outlined below as well as serve on additional college and campus committees. These include chairing an undergraduate major review committee and chairing the Academic Senate and College Rules & Jurisdiction committees during a period of numerous rule changes resulting from integration of Cooperative Extension into the College. Also, as chair of the Earth Sciences & Resources Graduate Group, I was responsible for transformation of this Group into the new Hydrologic Sciences Graduate Group and the creation of Hydrology undergraduate teaching programs (new major and minor). My efforts in curriculum development also resulted in my chairing a graduate education oversight committee for the College.

- Assistant Professor*, Departments of Land, Air & Water Resources and Agricultural Engineering, UC-Davis; 10/84-6/89.

In this capacity, I have had responsibility for instruction of 2-3 courses per year, support and supervision of up to ten research staff and administration of several research grants. My research program considers near surface processes such as infiltration, surface evaporation and irrigation management, as well as various aspects of shallow groundwater including; vapor movement in unsaturated soils, lateral subsurface flows, seepage from wastewater impoundments, groundwater modeling, soil salinity and drainage of cracking clay soils, and regional modeling of shallow groundwater as affected by irrigation and drainage (see publications). In addition to regular committee responsibilities, I served as Chair of the Committee of Consultants on San Joaquin River Water Quality, Chair of a faculty position (geohydrology) search committee, and Chair of the interdisciplinary Graduate Program of Earth Sciences and Resources.

Research Associate, Department of Agricultural and Chemical Engineering, Colorado State University; 1/84-9/84.

As a research associate, I was responsible for completion of contracts with oil shale processing companies and consulting firms relative to the leaching of spent oil shales. This work involved laboratory leaching column and hydraulic property studies, as well as, a conceptual mass balance estimate of drainage from spent oil shale piles in the field.

Research Assistant, Department of Agricultural and Chemical Engineering, Colorado State University; 7/81-12/83.

During this period, I completed classroom and laboratory studies toward the Ph.D. In the laboratory, gamma ray attenuation methods were devised for simultaneously monitoring water and salt movement in relatively dry soils.

Research Assistant, Department of Agricultural Engineering, Oregon State University; 6/80-6/81.

In this year, I completed coursework in hydrology, water chemistry, and adult education, as well as, M.S. thesis work related to fecal coliform contamination of Tillamook Bay from land application of dairy wastes.

Engineer-in-Training, Oregon Soil and Water Conservation Commission, stationed at The Dalles, OR; 6/79-9/79.

As an intern, I worked with USDA-SCS personnel in the design, layout and inspection of earthen terraces constructed so as to limit hillside erosion.

CONFERENCE PUBLICATIONS

Moore, J. A., M. E. Grismer, S. R. Crane, and J. R. Miner. 1982. Evaluating dairy waste management systems' influence on fecal coliform concentration in runoff. ASAE Paper No. 82-4024.

McCullough-Sanden, B. L., T. K. Gates, and M. E. Grismer. 1986. Analysis of seepage in an on-farm evaporation pond. ASAE Paper No. 86-2064.

Grismer, M. E. 1987. Water vapor adsorption kinetics during constant-rate infiltration. ICIDA Conference, Hawaii. January.

van der Tak, L. D. and M. E. Grismer. 1987. Irrigation, drainage and soil salinity in cracking soils. ASAE Paper No. 87-2052.

Grismer, M. E. 1987. Automated monitoring of remote soil sensors. ASAE Paper No. 87-2095.

Gates, T. K. and M. E. Grismer. 1987. Stochastic optimal management of saline perched aquifers in irrigated regions. Proceedings of International Conference on Groundwater Contamination: Use of models in Decision-Making. Amsterdam, The Netherlands. October.

Tod, I. C. and M. E. Grismer. 1988. Drainage efficiency and cracking clay soils. ASAE Paper No. 88-2588. December.

Grismer, M. E. 1989. Drainage efficiency and drain water quality. In: Proceedings of the Eleventh International Congress on Agricultural Engineering, Dublin, Ireland. September. pp. 285-290.

Grismer, M. E. 1990. Deep percolation, drainage and water quality. In: Proceedings of the ASCE National Conf. on Irrigation and Drainage. July. pp. 355-362.

Lyons, T. C. and M.E. Grismer. 1992. Management of agricultural drainage pollution considering regional cooperation.

Grismer, M.E., F. Karajeh and H. Bouwer. 1993. Evaporation pond hydrology. In: Proceedings of the ASCE National Conf. on Irrigation and Drainage. July.

Bali, K. M. and M. E. Grismer. 1993. Measurement of multi-phase flow in relatively dry porous-media. ASAE Paper No. 932063. June.

Bali, K. M. and M. E. Grismer. 1993. Calibration of dual-energy gamma systems for determining liquid saturations during multiphase flow in soils. International Conf. on Physical Properties of Agricultural Materials, Bonn, Germany. Paper No. 93-1007. Sept. Also in Int'l Agrophysics 8:1-8.

Bali, K. M., M. E. GRISMER, K. S. Mayberry and J. M. Gonzalez. 1994. Temporal and spatial variability of infiltration in heavy clay soils. ASAE/ASCE International Summer Meeting, Kansas City, MO. Paper No. 94-2044.

Bali, K.M. and M.E. Grismer. 1995. Management of surface irrigation systems in heavy clay soils. In: Proceedings of ASCE Intl. Conf. on Water Resources Engr., San Antonio, Texas. pp. 1590-94.

- Guitjens, J.C., J.E. Ayars, M.E. Grismer and L.S. Willardson. 1995. Irrigation/drainage practices for water quality management. In: Proceedings of ASCE Intl. Conf. on Water Resources Engr., San Antonio, Texas. pp. 927-931.
- Ayars, J.E., M.E. Grismer and J.C. Guitjens. 1995. Water quality as a design criteria in irrigation and drainage water management systems. In: Proceedings of ASCE Intl. Conf. on Water Resources Engr., San Antonio, Texas. pp. 932-936.
- Grismer, M.E. 1996. Emerging concepts for management of salinity and drainage in irrigated regions. In: Proc. of N. American Water and Environ. Congress. Anaheim, CA. June.
- Tod, I.C. and M.E. Grismer. 1996. Efficiencies of drainage systems and improved water management. In: Proc. of N. American Water and Environ. Congress. Anaheim, CA. June.
- Bali, K.M. and M.E. Grismer. 1996. Water management and irrigation scheduling of sudan grass in clay soils. In: Proc. of N. American Water and Environ. Congress. Anaheim, CA. June

REFEREED PUBLICATIONS

- Crane, S. R., J. A. Moore, M. E. Grismer and J. R. Miner. 1983. Bacterial pollution from agricultural sources: A Review Trans. of ASAE 26(3): 856-866 and 872.
- Moore, J. A., M. E. Grismer, S. R. Crane and J. R. Miner. 1983. Modeling dairy waste management systems influence on coliform concentration in runoff. Trans. of ASAE 26(4): 1194-1200.
- Tanji, K. K., M. E. Grismer, and B. R. Hanson. 1985. Subsurface drainage evaporation ponds. Cal. Agriculture 39(9-10):10-12.
- Grismer, M. E., D. B. McWhorter, and A. Klute. 1986. Determination of diffusivity and hydraulic conductivity in soils at low water contents from nondestructive transient flow observations. Soil Science 141:10-19.
- Grismer, M. E., D. B. McWhorter, and A. Klute. 1986. Monitoring water and salt movement in soils at low solution contents. Soil Science 141:163-171.
- Grismer, M. E. 1986. Nondestructive observations of solution displacement in soils. Soil Science 141:185-189.
- Grismer, M. E. 1986. Pore-size distributions and infiltration. Soil Science 141(4):249-260.
- Grismer, M. E. 1987. Kinetics of water vapor adsorption on soils. Soil Science 143(5):367-371.
- Gates, T. K. and M. E. Grismer. 1987. Optimal management of saline water tables in irrigated regions. Cal. Agriculture 41(3-4):20-21.
- Grismer, M. E. and R. C. Woodring. 1987. Assessment of lateral groundwater flows in the San Joaquin Valley. Cal. Agriculture 41(3-4):22-23.
- Rashmawi, E. A. and M. E. Grismer. 1987. Groundwater flows to the San Joaquin River. Cal. Agriculture 41(5-6):18-19.
- Grismer, M. E. 1987. Vapor adsorption kinetics and vapor diffusivity. Soil Science 144(1):1-6.
- van der Tak, L. D. and M. E. Grismer. 1987. Irrigation, drainage and soil salinity in cracking soils. Trans. of ASAE 30(3):740-744.
- Grismer, M. E. 1987. Water vapor adsorption and specific surface. Soil Science 144(3):233-236.
- Grismer, M. E. and B. L. McCullough-Sanden. 1988. Evaporation pond seepage. Cal. Agriculture 42(1):4-5.
- Grismer, M. E. and T. K. Gates. 1988. Estimating saline water table contributions to cotton water use. Cal. Agriculture 42(2): 23-24.
- Grismer, M. E. 1988. Vapor transport during solution displacement in soils. Soil Science 146(4):215-220.
- Grismer, M. E. 1988. Water vapor adsorption kinetics and isothermal infiltration. Soil Science 146(5):297-302.
- Alemi, M. H., D. A. Goldhamer, M. E. Grismer, and D. R. Nielsen. 1988. Elution of seleniurn from contaminated evaporation pond sediments. J. Environ.Qual. 17:613-618.
- McCullough-Sanden, B. L. and M. E. Grismer. 1988. Field analysis of seepage from drainwater evaporation ponds. Trans. of ASAE 31(6):1710-1714.
- Grismer, M. E., I. C. Tod, and F. E. Robinson. 1988. Subsurface drainage system performance after 20 years of operation in the Imperial Valley. Cal. Agriculture 42(3):24-25.
- Grismer, M. E., T. K. Gates, and B. R. Hanson. 1988. Irrigation and drainage strategies for salinity problem areas. Cal. Agriculture 42(5):23-24.
- Gates, T. K., R. J-B. Wets, and M. E. Grismer. 1989. Stochastic approximation applied to optimal irrigation and drainage planning. J. Irr. & Drain. ASCE 115(3):489-503.

- Gates, T. K. and M. E. Grismer. 1989. Irrigation and drainage strategies in salinity-affected regions. *J. Irr. & Drain.* ASCE 115(2):258-287.
- Grismer, M. E., and B. L. McCullough-Sanden. 1989. Correlation of laboratory analyses of soil properties and infiltrometer seepage from drainwater evaporation ponds. *Trans. of ASAE* 32(1):173-176.
- Grismer, M. E. 1989. Seepage control from drainwater evaporation ponds. *Cal. Agriculture* 43(1-2):21-23.
- Tanji, K. K. and M. E. Grismer. 1990. Evaluation of drainwater evaporation ponds. WRC Center final report.
- Lima, L. A., M. E. Grismer, and D. R. Nielsen. 1990. Salinity effects on Yolo loam hydraulic properties. *Soil Science* 150(1):451-458.
- Grismer, M. E. 1990. Leaching fraction, soil salinity, and drainage efficiency. *Cal. Ag.* 44(6):24-27.
- Grismer, M. E. and T. K. Gates. 1990. Hydrologic aspects of saline water table management in regional shallow aquifers. In: *The Economics and Management of Water and Drainage in Agriculture*, Arjel Dinar and David Zilberman (eds.), pp. 51-70.
- Grismer, M. E. and I. C. Tod. 1991. Drainage of clay overlying an artesian aquifer: I. Hydrologic Assessment. *ASCE J. of Irr. and Drainage* 117(2):555-570.
- Tod, I. C. and M. E. Grismer. 1991. Drainage of clay overlying an artesian aquifer: II. Technical Analysis. *ASCE J. of Irr. and Drainage* 117(2):571-584.
- Tod, I. C., M. E. Grismer, and W. W. Wallender. 1991. Measurement of irrigation flows through spiles. *ASCE J. of Irr. and Drainage* 117(4):596-599.
- Grismer, M.E. 1992. Cracks in irrigated soil may allow some drainage. *Cal. Ag.* 46(5):9-12.
- Grismer, M.E. 1992. Field sensor networks and automated monitoring of soil water sensors. *Soil Sci.* 154(6): 482-489.
- Lima, L. A. and M. E. Grismer. 1992. Soil cracking morphology and soil salinity. *Soil Science* 153(2):149-153.
- Weight, G., A. Orhun and M. E. Grismer. 1992. Automated power generation for measurement of subsurface drainage flows. *Applied Engineering in Agriculture.* 8(6):795-797.
- Grismer, M. E. and E. A. Rashmawi. 1993. The Dupuit-Forchhmer approximation and ground water flows to the San Joaquin River. *Cal. Ag.* 47(1):12-16.
- Grismer, M. E. 1993. Subsurface drainage system design and drainwater quality. *ASCE J. Irr. & Drain.* 119(3):537-543.
- Lima, L.A. and M.E. Grismer. 1994. The formation of preferential paths in shrinking and swelling soils. *Proc. of the XII World Congress on Agricultural Engr., Int'l Comission of Ag. Engr. Milan, Italy.* 1:246-252. Sept.
- Grismer, M. E. and I. C. Tod. 1994. Field procedure helps calculate irrigation time for cracking clay soil. *Cal. Ag.* 48(4):33-36.
- Grismer, M. E., M. N. Orang, V. Clausnitzer and K. Kinney. 1994. Effects of air compression and counterflow on infiltration into soils. *ASCE J. Irr. & Drain. Engr.* 120(4):775-795.
- Yusufzai, A. K. and M. E. Grismer. 1994. Vertical drainage may improve soil salinity and moisture. *Cal. Ag.* 49(2):12-15.
- Orang, M. N. and M. E. Grismer. 1994. New equations for evapotranspiration in the delta. *Cal. Ag.* 49(3): 19-21.
- Lima, L. A. and M. E. Grismer. 1994. Application of fracture mechanics to cracking of saline soils. *Soil Science.* 158(2):86-96.
- Lyons, T. C. and M. E. Grismer. 1994. Irrigation land management model: Discussion. *ASCE J. Irrig. & Drain. Engr.* 121(1):123-127.
- Grismer, M. E., E. Labolle, T. Raihala and J. Eweis. 1994. A modified gravimetric method for measuring rates of vapor adsorption and desorption on soils: Kinetics of toluene adsorption/desorption on bentonite. In: *ASTM STP 1261, Volatile Organic Compounds in the Environment*, W. Wang, J. Schnoor and J. Doi. Eds. pp. 95-104.
- Bali, K. M., J. W. Hopmans and M. E. Grismer. 1994. Outflow methods for evaluating the soil hydraulic functional relationships between NAPL pressure and saturation in porous media. In: *ASTM STP 1261, Volatile Organic Compounds in the Environment*, W. Wang, J. Schnoor and J. Doi. Eds. pp. 105-118.
- Grismer, M. E., K. M. Bali and F. E. Robinson. 1995. Field-scale neutron probe calibrations and errors in water content estimates for a heavy silty clay soil. *ASCE J. Irrig. & Drain. Engr.* 121(5): 354-362.
- Grismer, M. E., K. C. Tarboton and W. W. Wallender. 1995. Integrated modeling of regional-scale irrigation/drainage management. *Proceedings of AAAS Symposium.* 38 p. (in press)

- Grismer, M.E. and H. Watanabe. 1995. The effect of irrigated agriculture on flow of groundwater and its quality in California. *Japan. I. Groundwater Tech.* 37(1):20-32.
- Rolston, D. E., G. E. Fogg, D. L. Decker, D. T. Louie and M. E. Grismer. 1996. Nitrogen isotope ratios: A tool for identifying nitrate contamination sources. *Cal. Ag.* 50: (2): 32-36.
- Grismer, M. E. 1996. Education in Hydrologic Science. *J. College Sci. Teach.* 25(4): 243-253.
- Guitjens, J.C., J.E. Ayars, M.E. Grismer and L.S. Willardson. 1997. Drainage design for water quality management: Overview. *ASCE J. of Irr. & Dm. Engr.* 123(3):148-153.
- Ayars, J.E., M.E. Grismer and J.C. Guitjens. 1997. Water quality as a design criteria in irrigation and drainage water management systems. *ASCE J. of Irr. & Dm. Engr.* 123(3):154-158.
- Nichols, J.R. and M.E. Grismer. 1997. Measurement of fracture mechanics parameters in silty-clay soils. *Soil Sci.* 162(5):309-322.
- M.E. Grismer and K.M. Bali. 1997. Continuous ponding and shallow aquifer pumping leaches salts in clay soils. *Cal. Ag.* 51(3):34-37.
- Grismer, M. E., H. L. Shepherd and A. P. Stubblefield. 1997. Winery wastewater treatment efficiency as it depends on depth and distance in a subsurface flow wetland. *Proc. of 27th IAHR Congress on Water for a Changing Global Community, San Francisco, CA: In-Press.*
- Grismer, M. E., K. M. Bali, F. E. Robinson and I. C. Tod. 1997. Effects of water management on water value relative to alfalfa yield: A case study for the low desert of California. *In: Water: Economics, Management and Demand.* Ed. By M. Kay, T. Franks and L. Smith. E & FN Publishers for ICID European Regional Conf. on Water as an Economic Good, Oxford, UK. Sept. pp.67-74.
- Shepherd, H. L. and M. E. Grismer. 1997. Constructed wetlands for waste water disposal. *Vineyard & Winery Mgmt.* 23(5): 65-68.
- Morrisey, F. A. and M. E. Grismer. 1998. Kinetics of VOC sorption/desorption on clay minerals. *J. of Contam, Hydro: In-press.*
- Grismer, M. E. and K. M. Bali. 1998. Effectiveness of subsurface drainage systems at the UC DREC in the Imperial Valley. *Cal. Ag. In-press.*
- Bali, K.M. and M.E. Grismer. 1998. Management of surface irrigation systems in heavy clay soils. Submitted to *ASCE J. of Irr. & Dm. Engr.*
- Liu, V. P., J. W. Hopmans, M. E. Grismer and J. Y. Chen. 1998. Direct estimation of two-fluid phase capillary pressure and permeability data from multi-step outflow experiments. *J. of Contam, Hydro: In-press.*



SMITH ENGINEERING & MANAGEMENT

May 11, 2006

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

Subject: Placer Vineyards Revised Draft Environmental Impact Report

P06003

Dear Mr. Kopper:

Per your request, I have reviewed the Revised Draft Environmental Impact Report on the proposed Placer Vineyards Specific Plan (hereinafter the RDEIR). My review has concentrated on the transportation and circulation component of the RDEIR. This letter-report summarizes my comments on the RDEIR for transmission to Placer County.

My qualifications to perform this review include registration as a civil and traffic engineer in California and thirty-eight years of professional consulting practice in those fields in this state, including considerable experience in both preparation and review of the transportation/circulation components of environmental documents. I am familiar with the project area and its environs and have had involvement in various capacities in a number of projects in Placer County affecting transportation and circulation. My resume is attached.

RDEIR Fails To Analyze, Disclose And Mitigate Project Traffic Impacts For AM Peak Period

The analysis of traffic impacts and mitigation requirements for intersections in unincorporated Placer County, Sutter County, the City of Roseville and at intersections under Caltrans jurisdictions is carried out only for the PM peak period. Only in the case of intersections studied within Sacramento County is the analysis carried out for the AM peak. Because AM peak traffic normally exhibits different directional patterns than PM peaks, the lack of an AM peak analysis may result in this RDEIR's failure to disclose significant traffic impacts by the project that are different (possibly at different locations or, though at the same intersection, requiring mitigation on different approaches or movements)

EE

from those disclosed by the PM analysis. This is why most communities require both an AM peak and a PM peak traffic analysis. Without the AM analysis, the RDEIR's traffic section fails to carry out the good faith effort to disclose impact that CEQA demands. Furthermore, because in the analysis of the future scenarios, many of the mitigation measures proposed in response to those project traffic impacts that are disclosed based solely on the PM analysis are directionally specific (such as the adding of an additional left turn lane for one particular approach), the mitigations defined in the RDEIR may be completely ineffective at mitigating the impacts that would have been disclosed had an AM peak analysis been carried out, and much more extensive mitigation than disclosed may be required. The text of the RDEIR in the first paragraph of page 4.7-31 concedes this point, stating, "*As individual development projects within the Specific Plan area are proposed, additional traffic analysis may reveal the need for additional improvements to provide acceptable operations for the AM peak period operations as well.*" Hence, it is clear that the RDEIR has not disclosed to the County Board of Supervisors and the public what the full extent of traffic impacts and mitigation needs of this Specific Plan are, thus not complying with CEQA requirements for disclosure of impacts and mitigation.

At best, delaying disclosure of AM peak traffic impacts and mitigation requirements to possible subsequent traffic studies constitutes a deferral of mitigation that is improper under CEQA. However, such subsequent traffic studies that would disclose AM traffic impacts may never happen at all. Because the subject RDEIR is billed as a "project level" EIR (as contrast with a "programmatic-level" EIR), as stated on page 2-8 of the RDEIR, for residential projects, if County staff determine that the projects are consistent with the Specific Plan and with land use patterns and assumptions anticipated in detail in this RDEIR, Government Code Section 65457 and CEQA Guidelines Section 15182 provide that no EIR or Negative Declaration need be prepared prior to approving such residential projects. Pages 2-9 and 2-10 of this RDEIR also detail how individual non-residential projects in the Specific Plan area could also be exempt from any requirements for further EIR or Negative Declaration preparation provided that the proposed, provided that the proposed tentative map is consistent with the densities assumed for the affected area in the Specific Plan and this RDEIR, provided it complies with the mitigation requirements adopted in connection with the Specific Plan approval, unless there are impacts that are peculiar to the individual proposed parcel and project or unless there is substantial new information shows that previously-identified impacts will be more significant than previously assumed. Given these circumstances, it seems unlikely that any analysis to disclose and mitigate the AM peak traffic impacts of the Specific Plan project will ever be performed.

EE cont.

Segment Level Of Service Analysis Understates Traffic Impacts

The roadway segment level of service analysis reflected in Table 4.7-4 (and others) assumes that the maximum daily traffic for each Level Of Service (LOS)

FF

gradation for arterial roadways would be per the "moderate access control" category. In reality, most of the roadways analyzed would be more reasonably characterized as having "low access control" (and consequently able to serve lower maximum daily traffic within each LOS gradation) with a few segments having "high access control" (greater traffic capacity within each gradation). As a result, the analysis probably understates the severity of impact on many segments relative to existing conditions. However, since the project or its mitigations upgrade most of the arterial roadways affected in ways that will inherently create a "high" level of access control, (except possibly in some situations where existing fronting uses will retain current access), this inaccuracy does not affect the assessment of the mitigated conditions.

FF cont.

RDEIR Fails To Analyze Traffic Impacts On Freeway Ramp Merge, Diverge And Weaving Sections

Yet another glaring omission in the RDEIR traffic impact analysis is the failure to analyze traffic impacts relative to freeway ramp adequacy considering merge, diverge and weaving section LOS. The analysis of the project's effects on freeway ramps is limited to a presentation of the daily ramp volume changes caused by future development scenarios. Because of the lack of merge, diverge and weaving section LOS calculations, the RDEIR offers no reasonable basis for knowing what impacts the project may have on freeway ramps.

GG

Methodology Relied-on For Intersection Traffic Impacts Is Obsolete And Provides Insufficient Information For Full Disclosure Of Impacts.

Placer County, Sacramento County, Sutter County and the City of Roseville rely on intersection Level Of Service (LOS) analysis by various adaptations of Circular 212 procedure. Circular 212 is now a quarter-century old methodology that was created as an interim analysis procedure pending updating of the Highway Capacity Manual (hereinafter the HCM). It has now been rendered obsolete by multiple subsequent editions of the HCM. While analysis under Circular 212 procedures does provide a relative measure of the differences in transportation effects of various development scenarios, it may not disclose the full severity of impacts that might be disclosed if the analysis had employed the more modern Highway Capacity Manual techniques that are generally accepted in the traffic engineering profession. The desire to maintain a consistency with techniques employed in earlier planning work is not a reasonable justification for failure to employ accepted best practices. Continuing to rely on Circular 212 procedure is akin to navigating by sextant or 'dead reckoning' when modern navigation devices like LORAN and global positioning systems are available.

HH

Current traffic analysis practice over the past two decades evaluates Level Of Service relative to delay experienced by motorists. Delay to motorists generally increases at exponentially higher rates as traffic approaches or surpasses the capacity of a road or intersection. HCM level of service procedures compute

delay experienced by motorists and grade LOS based on amount of delay experienced. By contrast, the obsolete Circular 212 procedures relied on in the RDEIR grade LOS based on an abstract value, the volume-to-capacity ratio (hereinafter v/c). The issue is that, in laymen's terms, v/c that is the criterion in the Circular 212 method increases roughly proportionate with traffic whereas, as capacity is approached or exceeded, the delay, which is the criterion in the HCM method and which is the actual impact the public perceives, increases at increasingly higher rates. Hence, the real traffic impacts that the subject Specific Plan project causes, which are often in the LOS E or F range where the exponential increases in delay that the public perceives as impact are considerably greater than the apparent impacts indicated by the linear and abstract v/c measure of the obsolete Circular 212 method. Thus, because of the obsolete analysis methodology the involved jurisdictions have been accustomed to relying upon, the RDEIR presents an abstract and understated disclosure of the significance of the significant impacts the Specific Plan project would have.

HH cont.

A second significant reason why reliance on the obsolete Circular 212 analysis methodology understates traffic impacts is because it does not provide information regarding traffic queues (stacking) at the intersections analyzed whereas the current HCM method does so. Queue length information is critical to the analysis of impacts of busy intersections because, if queues in turn storage lanes exceed the length of the lanes (thereby blocking flows in the through lanes) or queues in the through lanes extend beyond the length of the turning lanes (thereby blocking access to the turn lanes), a kind of condition the public refers to as "gridlock" will occur where the actual traffic impacts, the LOS experienced and the delay suffered, will be worse than indicated in the theoretical LOS computations. With the queue length information provided by the current HCM method, the analyst is able to disclose the significant impact problem and propose appropriate mitigation such as adding lanes or extending turning lanes. Because the Circular 212 method provides no queue information, significant traffic impacts caused by excessive queue lengths remain undisclosed.

RDEIR Analysis Methodology Understates Traffic Impacts Where Low Volume Crossroads Intersect Busier Roads At Two-Way Stops

A nuance of the analysis methodology employed to analyze unsignalized intersections may understate the impacts at intersections controlled by two-way stop signs (but not 4-way stops). The analysts have chosen to use as the criterion of impact the *average delay total for all approaches* (whereas they could have chosen some criterion that would have considered the possibility of intolerable delay on any one approach). Consider the situation where a minor roadway with stop control intersects a major road without stop control (the classic rural 2-way stop condition). In the existing condition, traffic on the minor road approaches must wait for a safe gap in traffic on the major road before it can proceed, but with light to moderate traffic, the waits are not intolerable. Under

II

the analysis criterion selected, in a future development scenario that adds considerable traffic to the major road but very little to the minor road, traffic on the minor road approaches might have to wait forever for a safe gap in traffic, but the analysis would show no significant impact because the *average delay for all approaches* computation would be dominated by traffic on the major street approaches that experiences zero delay. The RDEIR subtly admits this consideration in footnotes to tables (see, for example, footnote 1 to Table 4.7-17), stating: "*Average delay for all movements at intersection, including uncontrolled movements. Delay on some stop-controlled left turn movements may be substantial, but typically impacts a limited number of vehicles.*" The analysis criterion or significance in this procedure is unreasonable. If the same few individuals repeatedly suffer interminable delays every time they attempt to leave or return home through an intersection they cannot reasonably avoid, that is a significant impact. Since the delay on individual movements is reported by the analytic computation procedure, the analysts could easily have established some reasonable level of delay for low volume approaches that would be considered a threshold of significant impact, even if that delay is experienced by a relatively small number of drivers.

ll cont.

No Basis To Conclude RDEIR Has Evaluated Conditions Over Broad Enough Area To Disclose Full Extent Of Specific Plan Traffic Impacts

One of the fundamental questions one must examine in reviewing a traffic impact analysis is whether the analysis searched far enough in seeking to disclose impact. The RDEIR discloses that the project would generate in excess of 152,000 daily trips onto the area street and highway network external to the project limits. This amount of generated traffic would reasonably be expected to affect roadway facilities over a very broad area. While the RDEIR does disclose extensive traffic impacts of the project, it provides no indication regarding what methods of investigation, if any, were undertaken to assure that the project's traffic impacts do not extend over a broader area than that encompassed by the impacts disclosed. For instance, it appears entirely likely that, in the Roseville area, the project's traffic impacts could well extend to intersections to the east of Interstate 80. However, no intersections in this area have been studied. Likewise, it is reasonable to expect that the project's impacts on I-80, Business 80, and 70-99 might extend farther from the project area than the segments for which significant impacts were disclosed. Unless the RDEIR provides some assurance that its analysis limits extend to the farthest reaches of the area where the project produces significant traffic impacts, it cannot be said to have made the good faith effort to disclose impact required by CEQA.

JJ

Specific Plan Proposes County General Plan Policy Change That Would Create Confusion With Respect To CEQA Requirements

CEQA Article 21002 requires that for a project to be approved all *feasible* mitigation measures that would lessen the project's significant environmental

KK

impacts must be implemented. CEQA Article 21061.1 provides an explicit definition of "feasible". Placer County General Plan Policy 3.A.7 provides policy guidance for development and management for its roadway system including a listing of considerations under which exceptions to the County's level of service policy goals for developing and maintaining its roadway system could be made. The project applicants seek to modify another Placer County General Plan policy, Policy 3.A.12, that requires each development project to construct or fund improvements necessary to mitigate the effects of traffic from the project by adding the words "consistent with Policy 3.A.7". The apparent objective of the amended language is to attempt to substitute the more flexible terms of General Plan Policy 3.A.7 regarding the County's development and management of its roadway system for CEQA's explicit definition of feasibility with regard to mitigation, thereby making it more likely that the County might create exceptions that would obviate mitigation requirements. While this artifice seems unlikely to withstand an actual test of law, the proposed change to Policy 3.A.12 would create confusion wherein public policymakers might take actions believing they were in compliance with CEQA when they were not, thereby forcing the interested public to seek recourse through a test of law. Therefore, the proposed amendment to should be rejected.

KK cont.

Traffic Impacts of Specific Plan Project's Proposed Changes To County Transportation and Circulation-Related Goals and Policies Not Analyzed In RDEIR. All Analysis Of Impacts and Mitigation Requirements In RDEIR Based On Presumption That Proposed Degradation Of County Standards Is In Force

Under Specific Plan Transportation and Circulation-Related Goals and Policies, in proposed Policy 5.1, the Specific Plan proposes to insert an exception to Placer County *General Plan* Policy 3.A.7 wherein Level Of Service on the roadway system within the Project's Specific Plan Area and on its boundaries would be allowed to be degraded to LOS D (as contrast with *General Plan* Policy 3.A.7's requirement that LOS C be maintained except within a half-mile of state highways where LOS D is accepted). Nowhere does the RDEIR analyze the traffic impact of this blanket degradation of County LOS standards over the extended roadway system within the Specific Plan and on its boundaries. Since the project being evaluated under CEQA is the Specific Plan, the RDEIR is deficient in failing to disclose the traffic impacts of the Specific Plan's goal and policy component involving proposed degradation of LOS standards. It would be reasonable to expect that, at a minimum, the RDEIR would disclose estimates of increased daily or annual vehicle-hours of delay that degradation of the LOS standard would result in, and summarize the differences in mitigation requirements that would result from maintaining the established LOS standards or implementing the degraded LOS standards proposed, as well as evaluating the implications of the increased traffic congestion on air quality. It is noteworthy that the entire RDEIR analysis for the roadways within the Specific Plan area and

LL

on its boundaries is presumptive that the proposed LOS standard is already in place. Hence, there is no analysis of the proposed project's impacts and mitigation relative to the existing conditions (that would include the prevailing LOS standard) that CEQA requires.

LL cont.

RDEIR Provides No Analysis Of Specific Plan's Proposed Transportation Policies And Goals. Some Are Impractical, Internally Conflicting Or Meaningless

Many of the Specific Plan's Transportation Policies and Goals embrace attractive-sounding concepts and ideals, but thoughtful examination reveals them to be impractical, internally conflicting or meaningless. Consider, for instance, Roadway Design Guideline 7 and Policy 5.15. Roadway Design Guideline 7 (Page 4.7-20) states that "*neighborhoods should be designed with internal connecting streets to encourage a more open and accessible network for residents and improve the distribution of traffic throughout the roadway network*", a street configuration that is known to inherently lead to resident concerns about traffic volume, speed, noise, safety and quality of life on residential streets unless a considerable application of traffic calming treatments is made. Policy 5.15 (pages 4.7-22 & 23) states that "*use of traffic calming roadway design techniques in the design of residential streets and intersections is required. Techniques may include corner bulb-outs at intersections, traffic circles and rotaries, chokers, chicanes, etc. In all cases, traffic calming devices shall be designed not to restrict access by emergency vehicles or inadvertently limit emergency response times below the required level of service standard. Yet traffic calming devices inherently adversely affect emergency response, individually and cumulatively.*

MM

We note that the RDEIR only presents these guidelines and policies; it is deficient in failing to provide any critical assessment of them. Had the RDEIR provided the objective assessment it should have, it would have pointed out that traffic calming devices inherently restrict emergency response times, and that gaining the values of an open and accessible street network while providing enough traffic calming to maintain resident satisfaction about the quality of residential life relative to traffic without degrading emergency response below reasonable norms requires a delicate and not-always-successful process of compromise and balance among these three considerations.

Consider Policy 5.20 which provides that a park-and-ride lots will be provided. If the RDEIR provided the objective assessment of this policy that it should have, but fails to do, it would have noted that the minimum 193 spaces to be created under this policy are a minuscule total relative to the 152,300 external vehicle trips that the RDEIR estimates the project generates daily and that implementation of the policy as proposed, wherein it would serve less than 0.13 percent of the project's external daily traffic (even presuming that all the parking

spaces get filled by Specific Plan area travelers and are not occupied by travelers from more distant hinterlands) renders the policy inconsequential and meaningless.

Transportation and Circulation-related Policies 5.16 through 5.19 concern provision of physical facilities in support of public transit. If the RDEIR contained the objective comment on these proposed policies that it should, it would state that, absent a regional commitment to massive increased funding for transit operations that elsewhere the RDEIR admits is highly doubtful, the effect of these policies is largely meaningless.

A similar example involves Policy 5.6 on Regional Transportation Improvements which states that Placer Vineyards landowners and the County will define (*but not necessarily enter into*) development agreements that ensure the project pays for its fair share of transportation improvements. While this weasel-worded policy gives the impression that the Project will provide funding to mitigate its transportation impacts, if the RDEIR had actually objectively assessed the policy as it should have, it would have commented that the funding provision and mitigation would only take place at those many locations of significant project traffic impact that are outside direct control of Placer County if the responsible jurisdiction agrees to implement the specific improvement identified as mitigation for Placer Vineyards and is able to assemble the funds over-and-above Placer Vineyard's "fair share" needed to actually complete the improvement. Although it repeatedly makes this comment in comment on numerous individual project mitigation measures proposed outside Placer County's direct jurisdiction, the RDEIR leaves it to the public to "connect the dots" to realize that, on the whole, outside the direct jurisdiction of Placer County, the purported commitment of the project to fund fair share traffic mitigation improvements may be meaningless in the sense that it in no way guarantees implementation of those improvements.

MM cont.

Including a narration of the Specific Plan's proposed transportation and circulation-related goals and policies in the RDEIR without providing an objective point-by-point assessment of them is the equivalent of inserting a public relations and marketing brochure for the project that says everything about transportation and circulation is going to be perfect. This is not consistent with the EIR's CEQA-defined purpose as an information document.

Assessment Of Internal Traffic Loads On Localized Project Area Roadway Network Uncertain

In the RDEIR computation of project trip generation, of the 233,273 trips estimated to be generated by the project daily, some 40,500 trips are estimated to have both origin and destination within the project. Approximately 152,300 trips daily (233,300 minus 81,000 trip ends for the 40,500 trips that have both origin and destination within the project area) are estimated to be made between the project area and external locations. These estimates are reasonable as long

NN

as the 40,500 "internal" trips are actually assigned to the local roadway network and considered in the LOS analyses (as contrast with being "erased" from all further computations at the conclusion of the trip generation stage. The RDEIR and its Appendices provide no indication whether the "internal" trip component is actually assigned to the roadway network for LOS analysis or whether it has simply been disregarded after the trip generation stage. The RDEIR should provide a clarification on this issue and, if the internal trips have in fact been disregarded in analyses subsequent to the trip generation stage, the traffic impact LOS analyses should be recompiled with the internal traffic assigned to project area roadways including the boundary streets.

NN cont.

RDEIR Traffic Analysis Has Not Been Performed On Project As Currently Defined.

Footnotes to Tables 4.7-14 and 4.7-15 each note that the traffic analysis contained in the RDEIR is based on different land use assumptions than the plan currently proposed in the RDEIR. The footnotes make the unsupported assertion that "*the differences are minor and would not affect the outcome of the analysis.*" In order to reasonably demonstrate that a traffic impact analysis performed for a different plan remains adequate to disclose the impacts and required mitigations for the currently proposed Specific Plan, the RDEIR must, at a minimum, document the differences in land use, both quantitatively by use category and by location, between the plan reflected in the traffic impact assessment and the one currently proposed, and must document the differences in trip generation. The RDEIR should be revised to provide this clarification.

OO

Finance Plan For Project Internal And Off-Site Roadway Improvements And Traffic Mitigations Is Not Reviewed In RDEIR

The RDEIR states that the Specific Plan applicants are developing a Public Facilities Financing Plan that will outline the funding and timing of transportation infrastructure within the Specific Plan area boundaries as well as required off-site improvements, including traffic mitigation fee programs. The RDEIR states that it assumes the Finance Plan will be approved concurrently with the Specific Plan. However, since the Finance Plan is critical to a) whether the internal and off-site roadway improvements will actually be in place at the various stages of "with project" scenarios assumed in the analysis and b) whether recommended traffic mitigations are likely to be completed, it is incumbent upon the RDEIR to perform an objective review of the soundness of the Finance Plan. Absent this review, the RDEIR's assumptions about certain internal and off-site roadway improvements and project traffic mitigations being in place by certain development stages or points in time is purely speculative, which is inadequate under CEQA. Obviously, the RDEIR has not made an objective review of the Finance Plan, so all of the assumptions in the RDEIR with respect to the timing of completion of transportation infrastructure and mitigation improvements to be

PP

completed or financed by the Specific Plan applicants must be regarded as speculative.

PP cont.

Failure To Adequately Disclose And Mitigate Construction Impacts On Traffic

The RDEIR briefly examine construction traffic impacts of the Specific Plan. However, that analysis is limited to consideration of the additional traffic that would be created by the travel of construction workers and transport of construction materials during the construction period. This analysis is inadequate in two major respects. First, the RDEIR completely fails to examine the construction traffic impacts of the traffic impacts caused by the construction of the project's internal and off- site roadway improvements which involve major reconstruction of significant lengths of existing major roadways and the construction of project traffic mitigations which involve major reconstruction of many busy intersections. Such major road and intersection reconstruction, many occurring in simultaneous time periods, will require multiple road closures and lane closures over lengthy periods of time that will result in massive congestion on the routes where reconstruction is taking place and cause massive traffic diversions to other routes, producing significant additional congestion in those places. The RDEIR is defective in that these significant construction impacts on traffic are not disclosed or mitigated. Second, the mitigation the RDEIR proposes for the limited construction traffic impact it does disclose, that of the movement of construction workers and materials, is simply an abstract promise to, in the future, develop construction traffic management plans for all construction activity that would seek to minimize the impacts of construction traffic. This type of abstract promise to develop future mitigation plans constitutes a deferral of mitigation that is improper under CEQA.

QQ

Questions Concerning RDEIR Traffic Forecasts

RDEIR pages 4.7-35 and 36 provide a brief narrative description of how the traffic forecasts that underlie its traffic impact assessment were carried out. However, a number of key considerations in the forecasts are not clarified in the narrative and supporting materials.

1. As previously noted, some 81,000 of the 233,000 new trip ends generated by the project were assumed to comprise some 40,500 trips that are completed between trip origins and destinations internal to the project area. The question is, were these "internal trips" assigned to the local roadway network by the traffic forecast model, or were they simply "erased" from the analysis at the trip generation stage?
2. The narrative is unclear how the output from the traffic model was adjusted to provide input to those aspects of the impact analysis that are performed in terms of daily traffic volume versus those that are performed in terms of pm peak traffic. Please provide clarification. Please include in the clarification an explanation of how model output was treated for input to the ultimate LOS

RR

analyses to replicate both peak period flows that tend to have directional dominance and daily flows that tend to have directional balance.

3. As the narrative explains, for each analysis stage, the traffic model was used to define the differential on each roadway between the "no project" condition and the "with project" condition and this differential was then added to existing traffic to create the actual traffic input to the LOS impact analysis. It is acknowledged that this is a useful procedure to overcome the possibility of errors where anomalies exist in the forecast model that cause consistent underreporting or over-reporting of traffic on certain individual roadway segments. Such a procedure is reliable and reasonable where the anomalies in the forecast model are limited to scattered isolated roadway segments or specific limited roadway corridors (a common example of this latter problem occurs in models where an arterial roadway closely parallels a freeway). However, sometimes forecast models stubbornly exhibit a systematic difficulty producing reasonable forecasts over a particular subarea even though the model provides reliable results over the majority of the modeled area. If this kind of subarea anomaly exists and coincides with the Specific Plan project study area, it is inappropriate to rely on the model at all in the analysis. Please provide assurance that whatever anomalies in the Placer County traffic model that caused the incremental procedure described on RDEIR pages 4.7-35 and 36 to be adopted are isolated and not systematic to the study area or to corridors critical to the study area.
4. The RDEIR narrative on this topic indicates that, in the runs of the Placer County traffic model for the "with project" condition, the completion of roadway improvements in the project area and the presence of project generated traffic may have caused other non-project traffic to be redistributed to other destinations or to be reassigned to alternate routes in avoidance of routes that would be heavily loaded by project traffic. The question is whether the analysis looked broadly enough at the output to determine whether these redistributions and reassignments of non-project traffic caused significant traffic impacts in areas where large direct increments of project traffic would be unexpected. The fact that the RDEIR did not evaluate LOS at any intersections east of I-80 suggests that the analysis may not have been sufficiently broad-seeking to disclose all of the project's traffic impacts.

Project's Significant Traffic Impacts At Intersection Of Walerga Road And PFE Road Only Mitigated To LOS D. Similar Condition True In Cumulative Analysis For Baseline Road.

The RDEIR indicates on page 4.7-42 that the project's significant traffic impact at the intersection of Walerga Road and PFE Road would be mitigated to LOS D. Mitigation to LOS D would only qualify as mitigation to conditions of less than significance if it were to be considered on the project boundary streets (possibly a plausible interpretation since both intersecting streets do front on the project boundaries in some segments though not at this intersection) *and also only if* another proposal of the Specific Plan project, that of degrading existing Placer

RR cont.

SS