

Tecklin, J. 2000. Distribution and abundance of the California Black Rail (*Laterallus jamaicensis coturniculus*) in the Sacramento Valley Region with accounts of ecology and call behavior of the subspecies. in California Department of Fish and Game.

Woodbridge, B. 1991. Habitat Selection by Nesting Swainson's Hawks: A Hierarchical Approach, M.S. Thesis, Oregon State Univ. Corvallis, OR.

Thank you for the opportunity to comment on the Draft Revised EIR for the Placer Vineyards Specific Plan. For the reasons cited above we request that the project Specific Plan, Revised DEIR, and Water Supply Assessment be withdrawn and rewritten. A newly revised version of these documents should be recirculated for public comment.

AA

Sincerely,



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LETTER 24 TERRY DAVIS, KIM DELFINO, JAMES PACHL, AND ED PANDOLFINO, SIERRA CLUB, FRIENDS OF THE SWAINSON'S HAWK, DEFENDERS OF WILDLIFE, SIERRA FOOTHILLS AUDUBON SOCIETY

Response 24A: Commenters note that they oppose the project and are incorporating comments by others by reference, including comments on the previous Draft EIR. Comment acknowledged. As described on page 2-3 of the Revised Draft EIR, the County has elected not to respond to comments on the previously circulated Draft EIR in accordance with Section 15088.5 of the CEQA Guidelines.

Response 24B: Commenters question adequacy of Revised Draft EIR. The Revised Draft EIR fully complies with the requirements of both CEQA and Government Code Section 65451, subdivision (a). Placer County previously chose to partially recirculate the Revised Draft EIR in accordance with Public Resources Section 21092.1 and CEQA Guidelines Section 15088.5. As part of this partial recirculation effort, Placer County also elected to make available for public review the proposed Placer Vineyards Public Facilities Draft Financing Plans for both the project as proposed (14,132 dwelling units) (“the Base Plan”) and for the Blueprint Alternative (21,631 dwelling units). The draft Financing Plans have been available for a 45-day public review and comment period, thus rendering moot the commenter’s suggestion that the failure to include such documents in the Revised Draft EIR violates CEQA and the Government Code.

The County’s decision to release the draft Financing Plans for public review and comment fulfills the County’s previously-stated commitment, as set forth in the text of the Revised Draft EIR, to make these documents available for public inspection during the period of review of the Revised Draft EIR (see Revised Draft EIR, page 3-34). As stated in the Revised Draft EIR, the County intended to release the Financing Plans for public review simultaneous with release of the Revised Draft EIR; however, the drafts of the Financing Plans were not complete at the time the Revised Draft EIR was released for public review. The County’s decision to allow public review of the Draft Financing Plans in conjunction with the Revised Draft EIR as part of this recirculation should not be perceived as the County’s concurrence with commenters on the Revised Draft EIR who suggested that a Financing Plan is required by CEQA, should the project be approved, or that CEQA requires public review of whatever documents comprise the “financing measures” required for specific plans (see Gov. Code, Section 65451, subd. (a)(4)). The Board of Supervisors will consider a final Financing Plan in association with the project separate and apart from any action on the Revised Draft EIR. Also see Response to Comment 15D.

As demonstrated in the Draft Financing Plans, the Project developers have carefully considered all estimated costs of providing public facilities necessary to support the Project, including the costs of all mitigation measures set forth in the Revised Draft EIR.

On the subject of the County’s fee-based approach to mitigating certain categories of impacts, please see Response to Comment 19B.

Response 24C: Commenters suggest that biological mitigation measures are inadequate and may violate the law. The assertion is made without substantiation; therefore no response is possible. In the County's opinion, the Revised Draft EIR fully complies with the law. Specific concerns raised by commenters in later paragraphs of this letter are addressed below.

Response 24D: Commenters question the existence of the Financing Plan and believe that the Specific Plan is inadequate without one being available for public review. See Responses to Comments 15D and 24B. The purpose of the CEQA response to comments process is to receive comments on the adequacy of the Revised Draft EIR. Comments received from the commenters appear to be directed at the Specific Plan and are noted for the record.

Response 24E: Commenters question the existence of Financing Plan and believe that the Revised Draft EIR is inadequate without one being available for public review. See Responses to Comments 15D and 24-B. The County's decision to release the Draft Financing Plans for public review and comment renders moot the commenter's assertion that failure to make these documents available during the 45-day Revised Draft EIR public commenter period constitutes a violation of Public Resources Code Section 20192, subdivision (b)(1) and CEQA Guidelines Section 15087, subdivision (c)(5).

As stated in the text of the Revised Draft EIR, the County intended to release the Financing Plans for public review simultaneously with release of the Revised Draft EIR; however, the drafts of the Financing Plans were not complete at the time the Revised Draft EIR was released for public review (see Revised Draft EIR, page 3-34). The County's decision to release the Draft Financing Plans for public review and comment fulfills the County's previously-stated commitment, thus curing the alleged procedural violations cited by the commenter caused by the failure to include these documents during the 45-day public review of the Revised Draft EIR. It is also clear that the release of the Draft Financing Plans cures any alleged abuse of discretion by the County's failure to include these documents during the previous circulation.

The County's decision to release the Draft Financing Plans for public review and comment fulfills the County's previously-stated commitment, as set forth in the text of the Revised Draft EIR, to make these documents available for public inspection during the period of review of the Revised Draft EIR (see Revised Draft EIR, page 3-34). As stated in the Revised Draft EIR, the County intended to release the Financing Plans for public review simultaneous with release of the Revised Draft EIR; however, the drafts of the Financing Plans were not complete at the time the Revised Draft EIR was release for public review.

Response 24F: Commenters argue that the Revised Draft EIR must be recirculated with Financing Plan. See Responses to Comments 15D and 24B. The County's decision to make available for a 45-day public review and comment period the Placer Vineyards Public Facilities Draft Financing Plans for both the Base Plan and for the Blueprint Alternative renders moot the issue of whether the failure to include these documents during the Revised Draft EIR public review period constitutes a violation of Public Resources Code Section 21091, subdivision (a). The Draft Financing Plans, in conjunction with the Partially Revised Recirculated Draft EIR, have been

available for a 45-day public review and comment period, subsequent to the County's issuance of a Notice of Availability of the Partially Revised Recirculated Draft EIR for the Specific Plan.

Response 24G: Commenters question the feasibility and certainty of mitigation measures as they relate to financing and operation of public infrastructure. See Response to Comment 15D. The availability of the Placer Vineyards Specific Plan Public Facilities Financing Plan for public review and comment renders moot the commenter's assertion that without reviewing such plan, it is impossible to determine if many of the mitigation measures in the Revised Draft EIR are feasible. The commenter is also referred to Appendix Z of the Partially Recirculated Revised Draft EIR which contains a breakdown of the project's fair share of off-site traffic improvements, which clearly shows that the improvements are financially feasible.

Response 24H: Commenters ask how project phasing is tied to wastewater treatment plant capacity expansion. Timing of wastewater flows are controlled by Mitigation Measure 4.11.6-2c (Revised Draft EIR page 4.11-51) and Placer County General Plan Policy 4.D.2, which requires written certification of wastewater service availability prior to project occupancy. Excess capacity currently exists at the DCWWTP (Revised Draft EIR page 4.11-38) and plant expansions are programmed for 2010-2011 fiscal year (Revised Draft EIR Appendix R, RMC Technical Memorandum 4b).

Commenters state that there is no evidence that the City of Roseville will accept the Specific Plan's wastewater, or that funding will be available. The DCWWTP is operated under a joint powers authority (Regional Partners) known as the South Placer Wastewater Authority (SPWA) (Revised Draft EIR, page 4.11-33), which includes Placer County, the City of Roseville, and the South Placer Municipal Utility District. To suggest that the City of Roseville is the only responsible party is a misstatement of the facts. The SPWA is currently developing plans to accommodate flows from future SPWA Service Area, including the Placer Vineyards Specific Plan. The various ongoing planning efforts are reported on pages 4.11-38 and 4.11-39 and in Appendix R of the Revised Draft EIR. Funding plans for DCWWTP expansion are being developed by the SPWA, and will depend on the ultimate number of participants, including the Placer Vineyards Specific Plan project. The amended RWQCB waste discharge permit process for DCWWTP is underway as permit renewal time and schedule dictate. The latter task is evidenced, in part, by the work performed by Merritt Consulting appearing in Appendix Q of the Revised Draft EIR. Once the service area is expanded, all developments will be served according to existing agreements between the Regional Partners (City, County and SPMUD). Capacity and permits are provided to meet requested service by the Regional Partners.

See Response to Comment 15D regarding the Financing Plan.

Commenters question the absence of information on wet weather flows. Reference is made to RMC Technical Memorandum 2c in Appendix R of the Revised Draft EIR. Wet weather flows from the Placer Vineyards Specific Plan and other foreseeable developments are projected therein. This information, which is typically of limited value to the public, was not included in the body of the Revised Draft EIR at the request of the City of Roseville in order to reduce the complexity of the Revised Draft EIR. The Technical Memorandum identifies how wet weather

flows from Placer Vineyards and all foreseeable developments would be accommodated, and capacity is indicated for both DCWWTP and Pleasant Grove WWTPs.

With regard to the “sewage storage facility” issue, see Response to Comment 2A.

Commenter claims that the Revised Draft EIR fails to discuss the environmental impacts of additional flows to the DCWWTP or the SRCSD or the expansion of the two plants. This is clearly not borne out by a review of the Revised Draft EIR. Beginning on page 3-25, the needed sewer facilities are described as being an integral part of the project. Page 2-8 contains the statement that the two wastewater treatment plant expansions are treated programmatically in the Revised Draft EIR because planning is not yet complete for plant expansion. Beginning with Revised Draft EIR Section 4.1 (Land Use), an impact statement (Impact 4.1-11, Land use conflicts could be created by expansion of existing wastewater treatment plants) and discussion are provided related to plant expansions. This is followed in each Revised Draft EIR section with discussions related to wastewater treatment plant expansions. Section 4.3.4 contains an extended discussion of water quality impacts for both plants, including presentation of a technical memorandum by Merritt Smith Consulting, which details potential water quality impacts from DCWWTP plant expansion to accommodate the Placer Vineyards Specific Plan and other West Placer projects. The DCWWTP plant expansion is also addressed in the technical memoranda appearing in Revised Draft EIR Appendix R and in the supplemental memoranda appearing at the end of this Final EIR. Plant expansion impacts related to the actual footprint of the expansion of the two plants would be addressed as a supplement to the Revised Draft EIR at the time dictated by capacity demands exerted by the service area. Also, see Response to Comment 15O.

With regard to commenter’s claim that there is no evidence that that SRCSD has agreed or intends to accept wastewater from Placer Vineyards, the commenter is correct that no commitments have been made, although there is a long history of discussions between the project proponents, Placer County, and SRCSD intended to maintain the option of sending project effluent to the SRCSD system. This history is evident throughout the various documents comprising this EIR. For example, page 4.11.40 of the Revised Draft EIR describes discussions held between Placer County and SRCSD. On the same page the Revised Draft EIR also correctly points out that the *2020 Master Plan for the Sacramento Regional Wastewater Treatment Plant* identified the Specific Plan area as a “Potential Future Annexation” area. The commenter is also referred to Response to Comment Letter 2 where the SRCSD reports that “...the Revised Draft EIR is consistent with previous discussions between Placer County and SRCSD regarding provision of sanitary sewer service.” The same letter reports that SRCSD has evaluated potential utilization of SRCSD facilities as an option for wastewater conveyance from the proposed project. On August 30, 2006, the County received a letter from SRCSD staff that was less encouraging than past correspondence with regard to SRCSD’s willingness to serve the project area; however, this letter came from agency staff and did not appear to describe a board-level determination to exclude any future prospect of accepting project effluent. The letter does provide more reason to treat the DCWWTP as the preferred option for project wastewater treatment, while maintaining SRCSD as a possible second choice. For a discussion of the necessity to provide the kind of certainty in an EIR requested by the commenter, reference is

made to Response to Comment 15N where water supply infrastructure is discussed in a similar context. The same principles regarding availability of water supply are applicable to wastewater treatment and conveyance infrastructure. As noted above, timing of wastewater flows are controlled by Mitigation Measure 4.11.6-2c, which is consistent with the principles described in Response to Comment 15N.

Response 24i: Commenters claim that there is no evidence that payment of fees will result in the construction of traffic improvements in other jurisdictions such as Sutter County. The Sutter County Measure M-related proposal was determined to be a “reasonably foreseeable project” that would develop over time. The Cumulative (2025) No Project conditions assumed those roadway improvements contained in SACOG’s Metropolitan Transportation Plan (MTP), which included an interchange at Riego Road and SR 70/99 and the widening of Riego Road from two lanes to six lanes.

The proposed Placer Vineyards project would contribute to improvements in the Measure M area of South Sutter County through the following:

- Policy 5.6 of the Specific Plan calls for off-site transportation improvements including providing traffic signals and intersection improvements at the Riego Road/East Natomas Road, Riego Road/Pleasant Grove Road, Baseline Road/ Pleasant Grove Road and Baseline/Locust Road intersections. These improvements are also identified in Mitigation Measure 4.7-8b.
- Policy 5.5 of the Specific Plan calls for the Placer Vineyards land owners and Placer County to define development agreements to ensure that the project pays its fair share of regional transportation improvements.
- Placer County will coordinate with Sutter County in the development of an agreement for the funding of traffic improvements in Sutter County, as required by Mitigation Measure 4.7-2a.

Please see Response to Comment 15D for a discussion of mitigation financing and fair share contributions to mitigation.

Response 24j: Commenters claim that the Revised Draft EIR fails to demonstrate the stormwater drainage impacts will be mitigated due to the lack of a mechanism for facility maintenance. The commenters are referred to Mitigation Measure 4.11.9-2 in the section of the Revised Draft EIR titled “Drainage.” Mitigation Measure 4.11.9-2 reads as follows:

Prior to recordation of the first small lot final subdivision map in the Specific Plan area, a drainage service area under a new County Service Area (CSA), existing CSA #28, or a Community Facilities District (CFD) shall be established for the Specific Plan area in compliance with law. The CSA or CFD shall identify and establish ongoing funding for a continuous drainage facility maintenance program.

Response 24K: Commenters state that the project relies on an unsupported assumption regarding renewal of the existing PG&E Drum Spaulding contract, which is subject to FERC licensing.

The following paragraphs utilize information drawn from the California Public Utilities Commission *Hydrodivestiture Draft EIR for the Proposed Valuation and Divestiture of Hydroelectric Generation and Related Assets by PG&E* (2000) and briefly describe infrastructure associated with the Drum-Spaulding Hydroelectric Facility and address the regulatory process for reissuing hydropower licenses.

Drum-Spaulding Hydroelectric Facility

The Drum-Spaulding Hydroelectric Facility is located in the South Yuba and Bear River watersheds. Generally, the facility diverts water from river channels and conveys the water through a system of 12 powerhouses and 35 reservoirs, which have a storage capacity of 151,300 acre-feet. The diverted water eventually returns to the main channel. The main storage reservoirs are Lake Fordyce, with a storage capacity of 49,905 acre-feet, and Lake Spaulding, with a capacity of 74,800 acre-feet. The reservoirs store water from the Fordyce Creek tributary and South Yuba River, and the system diverts most of this water to the Bear River. PG&E also uses any excess water from the South Yuba Canal to make up the difference of the required flow in the Bear River.

PG&E diverts Bear River water to PCWA at numerous delivery points. Major delivery points to PCWA include diversions via the Middle Fiddler Green Canal, the South Canal, the Wise Canal, and the Boardman Canal. PG&E also diverts water from Canyon Creek to PCWA.

Mandated Minimum Flow Levels

Under Article 39 of the existing FERC license, there is a minimum flow of five cfs in the Bear River. Additionally, Article 40 of the existing license stipulates reservoir levels at 14 of the system reservoirs.

FERC Regulation

FERC'S Relicensing Process

Under the 1920 Federal Power Act, FERC has the regulatory power to evaluate and approve relicensing applications for hydropower projects. Applicants begin the application process five years before a hydropower license expires by notifying FERC that the applicant intends to file for a new license. At least two years before the license expires, the applicant must consult with NOAA-Fisheries, USFWS, and State fish and wildlife agencies. The applicant must also conduct any relevant studies (16 U.S.C. Section 808(c)(1)).

Under FERC regulations there are three different types of licensing processes: the Traditional Licensing Process (a three-stage structured process), the Alternative Licensing Process (a collaborative licensing process), and the Integrated Licensing Process (a mixture of both

aforementioned processes and the default application process). Each process includes two phases: a pre-application phase, and a post-application phase. During the pre-application phase, the applicant conducts studies to determine how the project will affect environmental resources.

Water Quality Certification

The applicant must also prepare a Section 401 permit application under the Clean Water Act as part of the relicensing process. Section 401 allows the State Water Resources Control Board (SWRCB) to prescribe effluent limitations necessary to ensure the facility complies with the Clean Water Act and any other applicable state laws. Section 401 also “provides that State certification conditions shall become conditions of any Federal license or permit for the facility.” In 1994, the United States Supreme Court held in *PUD No. 1 of Jefferson County v. Washington Department of Ecology* (1994) 114 S. Ct. 1900, 1910, that “pursuant to Section 401, a state may require a permit applicant to comply not only with water quality criteria that are expressed as numerical limits such as temperature and dissolved oxygen level, but with ‘designated uses’ of a water body as well.” However, in 1987, FERC issued Order 464, which stated a license applicant’s Section 401 certification request will be deemed waived if the SWRCB does not grant or deny the certification request within one year after the SWRCB receives the request.

Under the existing FERC license for the Drum-Spauling facility, the SWRCB has not certified any of the older facilities that pre-date the Clean Water Act. In 1981 and 1982, PG&E applied for certification for five new powerhouses, but the Central Valley Regional Water Quality Control Board decided not to act on the requests, and certification was deemed to be waived. Relicensing in 2013 of the Drum-Spauling Hydroelectric Facility will require 401 certification of all powerhouses.

License Conditions

Generally, FERC evaluates the entire relicensing application to determine what conditions to impose on the applicant. Due to particular system constraints, including physical or environmental factors, FERC may set license conditions that mandate minimum flows, reservoir levels, and temperature limitations.

Under the Federal Power Act (FPA), Congress allows some federal agencies, including the Secretary of the Interior and the Secretary of Commerce, to develop operating conditions for FERC licenses (Congressional Research Service, *Hydropower Licenses and Relicensing Conditions: Current Issues and Legislative Activity* (2004) page CRS-2). The FPA requires that hydropower licenses issued under the FPA, “in order to adequately and equitably protect, mitigate damages to, and enhance, fish and wildlife,” “shall include conditions for such protection, mitigation, and enhancement” (16 U.S.C. Section 803(j)(1)). “[S]uch conditions shall be based on recommendations received pursuant to the Fish and Wildlife Coordination Act from the National Marine Fisheries Service, the United States Fish and Wildlife Service, and State fish and wildlife agencies” (16 U.S.C. Section 803(j)(1)). However, FERC can reject in whole or in part any recommended condition if it is inconsistent with the stated purpose of 16 U.S.C. Section 803(j)(1) or any other applicable laws.

FERC monitors compliance of the license conditions on an ongoing basis and annually inspects system operations. FERC also performs environmental inspections approximately once every six years. Many of PG&E's FERC licenses include reopener provisions that allow some flexibility to change license conditions during the middle of the license term. If FERC does mandate changes mid-license, FERC requires that PG&E consult with state and federal agencies.

The above is provided as background to acquaint the commenters and others with the thoroughness of the relicensing process and the safeguards built therein. Further, in direct response to the concern that the FERC relicensing process would reduce the PCWA water supply contract, it is noted that FERC regulations are not to be given such effect that they will interfere with existing State laws controlling water resources. "Nothing contained in this chapter shall be construed as affecting or intending to affect or in any way to interfere with the laws of the respective States relating to the control, appropriation, use, or distribution of water used in irrigation or for municipal or other uses, or any vested right acquired therein" (16 U.S.C. Section 821). Although the commenters suggest that the State may propose to reduce PCWA's entitlement, this is highly unlikely and speculative. The commenters are referred to Response to Comment 15N for additional discussion of water supply and certainty of delivery. In addition, PCWA has recently written a letter to the County dated September 8, 2006 which elaborates on certain aspects of its Water Supply Assessment (Revised Draft EIR Appendix M). The letter is reprinted in its entirety in Final EIR Appendix FEIR-B. Among the subjects covered in the letter is the relicensing of the Drum-Spalding Hydroelectric Facility. The commenter is referred to the Final EIR Appendix for information on this subject. Also see Response to Comment 15K.

Commenters claim that the Revised Draft EIR fails to analyze additional diversions from the American River. See Response to Comment 15N. This assertion is untrue. Commenters are referred to Revised Draft EIR page 4.3-35 where the following paragraphs appear:

The initial surface water supply consists of available water from PCWA's unused American River water supply to be diverted at PCWA's new permanent American River Pump Station, conveyed and treated at the existing Foothill Water Treatment Plant, and delivered through PCWA's existing transmission pipeline system to the vicinity of Industrial. A booster pump and storage tank currently under construction would allow PCWA to introduce its water into the City of Roseville pipeline system. Under an existing agreement with the City of Roseville, PCWA can convey 10 MGD through the City's pipeline system to a location near Baseline Road and Fiddymont Road. Extension of this pipeline westerly in Baseline Road could deliver water to the Specific Plan area (see Figure 3-5 in Chapter Three of this Revised Draft EIR). For a discussion of limitations on use of the City's pipeline system for conveyance (wheeling) of water, see Section 4.11-7 of this Revised Draft EIR. Diversions from the MFP at the American River Pump Station location were previously evaluated in the *American River Pump Station Project Final EIS/EIR, American River Basin Cumulative Impact Report*, 2001.

A secondary initial surface water supply could be made available if the Sacramento River project has not begun delivery of water when the available initial supply, as described above, has been fully used. The secondary initial surface water supply consists of use of a portion (6,000 AFA) of the 29,000 AF of PCWA Middle Fork American River water currently contracted to SSWD. The supply would be diverted from Folsom Lake, treated at Sidney N. Peterson Water Treatment Plant (owned and operated by the San Juan Water District), and conveyed to the Specific Plan area via a new pipeline extending from the Cooperative Transmission Pipeline that currently ends in Antelope Road near Walerga Road. This pipeline would be extended westerly along Antelope Road to Watt Avenue and then north to the Specific Plan area. Alternatively, this supply could be conveyed in a pipeline constructed in PFE Road from Cook Riolo Road to Watt Avenue and northerly to the Specific Plan area.

Following the introductory language, these supplies are evaluated in each relevant topical area of the Revised Draft EIR, resulting in dozens of impact statements and conclusions. For examples of this analysis the commenters are referred to pages 4.3-76 through 4.3-80 of the Revised Draft EIR. Related discussions appear in Revised Draft EIR Sections 4.4, 4.6, and 4.11.

Although commenters reference both SB 610 and SB 221, it is important to note that SB 221 is applicable at the tentative subdivision map stage rather than the Specific Plan/EIR stage of project processing.

Response 24L: Commenters discuss the PG&E Drum Spaulding hydropower facilities contract renewal. Placer County Water Agency's (PCWA) contract with PG&E for 104,000 acre-feet of Yuba/Bear River water via the Drum Spaulding hydro system is discussed on page 4.3-34 of the Revised Draft EIR (Section 4.3, Hydrology, Water Resources, and Water Quality), and on page 4.11-58 (Section 4.11, Public Services, Infrastructure). It is noted that the contract expires in 2013, and that PCWA expects the contract to be renewed. It is also noted that the long-term water supply [11,500 acre-feet annually (AFA)] for the Placer Vineyards Specific Plan is proposed to come from PCWA's 35,000 AFA of contract water from the Central Valley Project. PCWA discusses its ability to serve the Specific Plan and the reliability of its various water sources in a Water Supply Assessment it prepared for the project on February 3, 2006 (see Appendix M of the Revised Draft EIR).

PCWA's surface water supplies may be subject to shortages in future dry years. To make up for such dry year shortfalls and for backup in the event of emergency or planned outages, PCWA is planning on developing groundwater resources as its service area expands west over the groundwater basin and into the area most likely to be served long term from the Sacramento River using the CVP contract supply. But to insure that there is no adverse long term impact of such dry year groundwater use, there must be groundwater banking in normal and wet years to offset the planned dry year use. That banking can most efficiently occur through "in-lieu recharge" which is the reduction of historic groundwater use in normal and wet years allowing the natural recharge flow to accumulate in the aquifer.

The Drum Spaulding hydro system is scheduled to undergo a relicensing process conducted by the Federal Energy Regulatory Commission (FERC) in 2013 (see Response to Comment 24K for background on this process). This relicensing directly affects the source under which PCWA is contracted with PG&E to receive 104,000 acre-feet of Yuba/Bear River water. The CVP contract, under which PCWA would serve the Specific Plan, is not subject to review under this FERC relicensing. The commenter is referred to Final EIR Appendix FEIR-B for additional background provided by PCWA on the legal framework as well as surface water management practices. The possibility that in the process of relicensing Drum Spaulding hydro system, PCWA's contract amount would be reduced, and that furthermore this reduction would force PCWA to reallocate water from other contracts (e.g., from the CVP allocation) is highly speculative and not consistent with the law nor with the manner in which surface water can be used.

Response 24M: Commenters discuss the proposed Sacramento River diversion. See Response to Comment 15N. As noted in Response to Comment 24L, the long-term water supply [11,500 acre-feet annually (AFA)] for the Placer Vineyards Specific Plan is proposed to come from PCWA's 35,000 AFA of contract water from the Central Valley Project. PCWA would access this contract water through a diversion structure at the Sacramento River north of Sacramento International Airport. The Revised Draft EIR notes on page 4.11-63 that the diversion structure, pumps, and water treatment facilities are not described or evaluated as part of the Specific Plan but are being evaluated separately by PCWA and the Bureau of Reclamation in a joint EIS/EIR (SCH #2003082076). For the Specific Plan to fully build out, either the Sacramento River diversion project must be completed or an alternative solution identified, as constrained by the mitigation contained in the Revised Draft EIR.

Potential impacts from the project development on endangered species have been thoroughly analyzed in the Biological Resources section of the Revised Draft EIR with proposed mitigation and thus it does not become the responsibility of PCWA's water supply project to provide the analysis or necessary mitigation. It is the County's understanding that the U.S. Fish & Wildlife Service, in dealing with ESA Section 7 consultations for major infrastructure projects similar to the proposed Sacramento River Diversion, has accepted the approach whereby local land use planning agencies such as counties, rather than infrastructure providers, are responsible for mitigating the impacts to federally listed endangered or threatened terrestrial species, provided that the infrastructure provider agrees not to serve new development absent proof either that the local agencies have required such mitigation or that the proponents of new development can otherwise show compliance with ESA requirements (e.g., successful completion of a wetlands permitting process involving Section 7 consultation with the U.S. Fish and Wildlife Service).

At the time this Final EIR was issued, PCWA and the County, among other parties, were discussing with the U.S. Fish & Wildlife Service a possible Memorandum of Agreement (MOA) that would employ a similar approach with respect to the Sacramento River Diversion project. The effect of such an MOA, if and when successfully consummated, will be to leave in the hands of the County the responsibility for mitigating any indirect effects on the landscape associated with the provision of Sacramento River water to new growth within the Placer Vineyards site. The project proponents, moreover, will need to obtain federal wetlands permits, which will

require the U.S. Army Corps of Engineers to consult with U.S. Fish & Wildlife Service prior to issuing such permits. That process will also ensure that impacts to federally listed species are adequately mitigated.

The commenter has not presented substantial evidence that the Sacramento diversion “has encountered problems” and will not be approved; therefore there is insufficient justification for requiring additional analysis in this Revised Draft EIR of potential impacts to the lower American River. The approach assumed in the Revised Draft EIR is consistent with the Water Forum Agreement and (as correctly pointed out by the commenters) with the adopted American River Flow Management Standard. The Water Forum Agreement signatories agreed to support PCWA’s pursuit of such diversion and the certified Water Forum EIR modeled such a diversion from the Sacramento River. Analysis of additional diversions from the lower American River is, therefore, highly speculative and beyond the scope of this Revised Draft EIR to analyze.

Response 24N: Commenters state that the Specific Plan and Revised Draft EIR lack adequate measures to reduce or avoid air quality impacts. A determination that a project would “contribute substantially” to an existing or projected air quality violation” requires a determination of the concentration of a pollutant attributable to a project. This is relatively simple for some pollutants, such as carbon monoxide. However, it is not currently possible to estimate long-term concentrations of pollutants such as ozone and particulate matter (PM₁₀ and PM_{2.5}) resulting from an indirect source of air pollutants such as the project. Project emissions do not just occur on the project site, but are spread over several counties.

Forecasting changes in ozone levels or particulate matter due to an individual project is not practical, given that ozone and a portion of urban particulate matter are a result of a complex series of photochemical reactions in the atmosphere. Computer models of photochemical ozone/particulate matter formation capable of providing a project-caused concentration change described both spatially and temporally would require massive amounts of weather and emissions data. While such models do exist they are typically used in the development of regional air quality plans, and are not usable for forecasting effects of an individual project.

Since the impact of an indirect source cannot be determined in terms of concentration, the Placer County Air Pollution Control District, like other air districts across the State, have recommended that project impact significance not be based on a specific change in projected concentration, but rather should be based on a mass emission. This is the type of analysis included in the Revised Draft EIR.

There is currently no method by which the EIR could ensure that the project does not interfere with ozone attainment. Attainment projections are based on estimated future growth and existing/proposed regional control programs. Projected growth rates in Vehicle Miles Traveled by county are part of the input to the mobile source inventory, but specific projects that may cause projected increases are not identified.

On page 4.8-20, the Revised Draft EIR reports the following:

On April 15, 2004 the Environmental Protection Agency (EPA) designated the Greater Sacramento Ozone non-attainment area as a "serious" non-attainment area for the federal eight-hour ozone standard. The eight-hour ozone standard, 0.08 parts per million (ppm), averaged over eight hours, replaces the one-hour standard that has been in place since 1979. The region has been given an attainment date of June, 2013.

As noted in the Revised Draft EIR, the Sacramento Region, which includes Placer County, has an attainment deadline of 2013 to meet the federal 8-hour ozone standard. SIPs demonstrating attainment of the new federal ozone standard must be adopted by the local air districts and ARB, and submitted to U.S. EPA by June 15, 2007.

A Sacramento Regional Non Attainment Area 8-Hour Ozone Rate-of-Progress Plan Final Report was adopted in February 2006. The plan evaluates how existing control strategies and already approved control measure commitments will provide the necessary future emission reductions to meet the federal Clean Air Act requirements for further progress for the period 2002-2008. The plan also includes an updated emissions inventory and set new motor vehicle emission budgets for transportation conformity purposes.

Also see Response to Comment 15T.

Response 240: The comment implies that some offsite infrastructure would be outside the jurisdiction of Placer County and the Placer County Air Pollution Control District, which is correct. In order to insure that appropriate steps are taken to minimize emissions during construction of offsite infrastructure outside of Placer County, the text under Mitigation Measure on page 4.8-34 is revised as follows:

Implementation of the ~~Mitigation Measures 4.8-1a-e~~ following measures will substantially lessen offsite construction-related air quality impacts, but *not to a level that is less than significant*.

4.8-2a Implement Mitigation Measures 4.8-1a-e where applicable, as determined in consultation with the appropriate air district.

4.8-2b Where off-site improvements are located outside Placer County, implement construction emission measures consistent with the policies and regulations of the local air district.

Response 24P: Commenter claims that off-site air pollution mitigation program does not meet CEQA requirements. The Placer County Air Pollution Control District's offsite mitigation program is used to reduce projects long-term ozone precursor emissions. The offsite mitigation program provides monetary incentives to sources of air pollutant emissions within the projects' air basin that are not required by law to reduce their emissions. Thus, the offsite mitigation program reduces emissions within the air basin that would not otherwise be eliminated. In 2006 the Placer County Air Pollution Control District awarded more than \$1.4 million dollars in clean

air grants that will reduce .38 tons of ROG and 4.65 tons of NOx per year. Many of the projects propose replacing old automobiles, school buses and trucks with new lower-emission vehicles, or retrofitting old vehicles so they emit fewer pollutants.

In lieu of the applicants implementing their own offsite mitigation program which would be coordinated through the District, the applicant can choose to participate in the Placer County Air Pollution District Offsite Mitigation Program by paying an equivalent amount of money into the District program. The actual amount of emission reductions needed through the Offsite Mitigation Program is calculated when the project's average daily emissions have been determined.

The off-site mitigation program would be administered by the Placer County APCD and fees would be adjusted over time to reflect the needs of the District at the relevant future point in time. The mitigation measure cannot specify measures to meet the 8-hour federal standard as the plan has not been adopted. However, the mitigation measure allows the PCAPCD to use the mitigation fees as it deems appropriate, which certainly could include measures that will be included in the next 8-hour federal plan or future updates/revisions to the plan.

The PCAPCD has not adopted specific thresholds of significance for the federal ambient standards and State ambient standards. Impact 4.8-7 of the Revised Draft EIR concludes that the project would "impede the region's ability to attain air quality standards", but makes no statement that this applies only to federal standards and not to state standards.

Determination that a project would "contribute substantially" to an existing or projected air quality violation" requires determination the concentration of a pollutant attributable to a project. Since the impact of an indirect source cannot be determined in terms of concentration, the PCAPCD, like other air districts across the State, have recommended that project impact significance be not based on a specific change in projected concentration, but is based on a mass emission. This is the type of analysis included in the Revised Draft EIR.

While the Revised Draft EIR does assume that the PCAPCD will be able to identify and implement offsets within the region, the conclusion is not made that the offset would eliminate the project's impact. The Revised Draft EIR concluded that even with mitigation in place as described the project would still have a significant adverse and cumulative air quality impact.

Mitigation Measure 4.8-3g was included in the Revised Draft EIR at the request of the PCAPCD and has been used in several other EIRs for large projects in western Placer County. There is no practical way that the County can provide a "back up guarantee" since legal authority to develop such a program lies with Air District. However, a backup is not needed in this case, because the Air District has developed and is implementing a fee program, as discussed above. It is reasonable to assume that the program will continue, perhaps in a modified state as needed to respond to changing conditions, as long as the County is in nonattainment for State and/or federal criteria pollutants.

For a discussion of fee-based mitigation and CEQA, see Response to Comment 15D.

Response 24Q: Commenters claims that the Revised Draft EIR fails to consider feasible mitigation measures and provides “examples.” A “...mandatory requirement to phase future development to performance goals in meeting air quality standards” or “...the project’s direct and indirect air emissions are fully mitigated” are not examples of mitigation measures capable of being included in a CEQA document, but, rather, are examples of policy statements that would need to be considered separately by County decision-makers. This is an example where commenters mix comments that may be germane to the Specific Plan with those that may be relevant to the Revised Draft EIR, making it difficult to discern which topics presented by the commenters are CEQA-related and which ones are not.

As discussed previously, mitigation is not available to reduce the full project impact on air quality below a level of significance. The ability of individual subsequent projects to do so will depend on the size and type of uses. Each project must implement the measures identified in the Specific Plan and Revised Draft EIR, which would reduce emissions for individual projects, sometimes below the Air District thresholds. Consequently, the emissions of the project as a whole will be reduced. The project will be subject to any and all land use controls contained in a future air quality plan (and any future revisions). Inclusion of such statements in the Specific Plan would have no affect on the project’s obligation to comply with any future control programs adopted as part of the regional air quality plan.

See Response to Comment 25N regarding project effects on attainment of the ambient air quality standards. Requirements for future siting of sensitive receptors are addressed by Specific Plan Policy 4.40 described on page 4.8-15 of the Revised Draft EIR.

Response 24R: See Response to Comment 24N regarding project effects on attainment of the ambient air quality standards. Revised Draft EIR significance standards are derived from CEQA Guidelines Appendix G as implemented by the PCAPCD. The County is not aware of any requirement in CEQA that provides that compliance with state standards must be presented separately. Background and Placer County-specific data with regard to State standards are presented in Revised Draft EIR Tables 4.8-1, 4.8-3, 4.8-4, 4.8-5 and 4.8-6. The PCAPCD policies cited on page 4.8-20 of the Revised Draft EIR are presented as part of the setting and background information and are not identified at any point as mitigation measures for the project, which begin on page 4.8-31.

Response 24S: Commenters claim that biological surveys are inadequate. See Response to Comment 25C. The Revised Draft EIR analyzed various data regarding biological resources that occur or potentially occur within the Placer Vineyards Specific Plan area. These included baseline data collected during field reconnaissance surveys to characterize general plant and wildlife resources as well as review of existing data obtained through resource agency data base queries, preliminary wetland delineation work, and other sources listed in Section 4.4.1 of the Revised Draft EIR.

The commenters also claim that, other than wetland delineation work, no surveys for special status species have been conducted. This is incorrect. Several surveys targeting special status species have been conducted within the Placer Vineyards Specific Plan Area. Rare plant surveys

have been, and are currently being conducted, on several properties within the Placer Vineyards Specific Plan area. These surveys, which have been conducted to support the Section 404 permitting process, have covered an estimated 2,760 acres of gross land to date. The only special status plant species identified has been dwarf downingia (*Downingia pusilla*), which was observed in the western portion of the Plan Area during the spring 2005 rare plant surveys. Vernal pool branchiopod (fairy shrimp and tadpole shrimp) surveys have also been conducted on several properties to support Section 404 permitting. The area surveyed thus far comprises an estimated 2,570 acres. These surveys have identified both California fairy shrimp (*Linderiella occidentalis*) vernal pool tadpole shrimp (*Lepidurus packardii*), and vernal pool fairy shrimp (*Branchinecta lynchi*) and/or their cysts within the north central and western portions of the Plan Area.

Additional surveys targeting special status wildlife within the Plan Area are planned for the summer of 2006 to support the Section 404 permitting process and implementation of mitigation measures. These surveys will provide additional data regarding potentially occurring breeding birds and their habitat. Target species include western burrowing owl, Swainson's hawk, grasshopper sparrow, and black rail. Surveys will also be conducted for potential heron rookeries. To date, no heron rookeries have been observed during prior survey work within the Plan Area, nor are there any records documented for the property in the California Natural Diversity Data Base (CNDDDB). Due to the lead time required between consideration of project entitlements and implementation, nesting surveys are appropriately conducted just prior to construction when meaningful data can be collected and appropriate actions taken, as required by relevant mitigation measures set forth in the Revised Draft EIR.

The site may support potential California black rail habitat. The California black rail is known to occur in salt marshes, shallow freshwater marshes, wet meadows, and flooded grassy vegetation (Eddleman et al. 1994). Once considered a coastal species, resident California black rails have recently been discovered to breed within freshwater marsh and wet meadow habitats in the Sierra Nevada foothills of Yuba, Butte, Nevada, and Placer Counties (Tecklin pers comm).

The potential for occurrence of California black rail within the Placer Vineyards Specific Plan area is considered low, as the Sierra Nevada foothill occurrences are typically associated with emergent wetlands in oak woodland communities. However, due to the relatively unknown distribution of this species within western Placer County, the marshes and drainages on-site that support emergent vegetation and year-round shallow flooding may be considered potentially suitable habitat for California black rail.

CDFG does not have published mitigation guidance for the California black rail within the Sierra Nevada foothill region. As such, preliminary reconnaissance surveys and review of available aerial photography and wetland delineations have identified potential rail habitat in eight property ownership units (i.e., #1, #3, #4a, #5c, #7, #8, #15, and #19). Field surveys will be conducted by a qualified biologist prior to any site construction within appropriate habitats (i.e., marshes and drainages with emergent vegetation). If determined to be present, steps to protect the black rail will be undertaken in consultation with CDFG, consistent with Mitigation Measure 4.4-7, as described in the Partially Recirculated Revised Draft EIR.

The commenters are referred to the Partially Recirculated Revised Draft EIR, August 2006, and revised Table 4.4-3, where the findings of the recent field work are described.

Response 24T: Commenters claim that proposed mitigation sites are inappropriate. The applicant has identified several proposed mitigation sites. The County will ultimately determine the identity of actual mitigation properties. Mitigation sites have been, and will ultimately be selected to meet all required mitigation measures. Since publication of the Revised Draft EIR, ongoing field work and analysis have resulted in adjustments to off-site mitigation resources represented by the proposed mitigation sites, as well as changes in on-site areas of impact. Revised Draft EIR Tables 4.4-9 and 4.4-12 are reprinted herein and represent the most current available information. These tables replace those appearing in the Revised Draft EIR.

Revised Table 4.4-9 Existing Mitigation Resources						
Placer County APN #	Name	Existing Vernal Pool Complex Habitat (acres)	Existing Wetlands and Other Waters (acres)	Restoration and/or Creation Potential, Vernal Pool Complex Habitat (acres)	Restoration and/or Creation Potential, Wetlands and Other Waters (acres)	Gross Acres
021-283-013-000 021-283-001-000 021-283-021-000 021-283-012-000 021-283-011-000	Antonio Mountain Ranch	34	22	21	20	660
021-110-031-000 021-110-036-000 021-110-002-000	Lincoln Ranch	0	0	54	54	1,079
021-030-002-000	Musolino Childrens' Trust	0	5	15	15	301
017-010-001-510	Placer 312	0	2	15	15	312
020-130-015-000 020-130-048-000 020-130-049-000 020-130-047-000 020-130-046-000 021-130-035-000	Redwing	128	95	30	31	993
021-030-008-000	Vogt	0	0	7	7	145
Total		162	124	142	142	3,490

Source: ECORP Consulting, 2006.

Revised Table 4.4-12 Aquatic Resource Impact Estimates						
Habitat	Direct Impacts (on-site) (acres)	Direct Impacts (off-site) (acres)	Indirect Impacts (on-site) (acres)	Indirect Impacts (off-site) (acres)	Preservation¹ (acres)	Creation/Restoration² (acres)
Vernal Pool Complex Habitat	69	5	19	3	192	74
Other Wetlands/Waters	27	2	0	N/A	0	29
Total	96	7	19	N/A	192	103
Notes: ¹ 2:1 for direct and indirect impacts to Vernal Pool Complex Habitat. ² 1:1 for direct impacts to other wetlands/waters. Additional restoration may be used in lieu of Preservation in circumstances deemed N/A means no indirect effects to non-fairy shrimp habitat type wetlands have been estimated						
Source: ECORP Consulting, 2006						

Of note is the fact that preservation of Vernal Pool Complex habitat has increased from 170 to 192 acres.

The commenters state that only Antonio Mountain Ranch (660 acres) contains any significant amount of “the type of grassland habitat which is primarily impacted by this project.” This is incorrect. Grassland communities, including vernal pool grassland, are also present on the Redwing property to the east of the town of Sheridan, north of Coon Creek. The Musolino property supports irrigated grasslands that represent foraging habitat for grassland wildlife, including raptors such as the Swainson’s hawk.

The Redwing property includes vernal pools that are known to support Dwarf downingia (*Downingia pusilla*), California fairy shrimp (*Lindieriella occidentalis*), and vernal pool fairy shrimp (*Branchinecta lynhci*). In addition to several raptor species, special-status species observed at the Redwing property include nesting Swainson’s hawks (*Buteo swainsoni*), California black rail (*Laterallus jamaicensis coturniculus*), and Western spadefoot toad (*Spea hammondii*). Antonio Mountain Ranch supports a large complex of vernal pools which has been documented by ECORP Consulting, Inc. to support rare plant species including Greene’s legenere (*Legenere limosa*) and Bogg’s Lake hedge hyssop (*Gratiolola heterosepala*). While Antonio Mountain Ranch has not been surveyed for the presence of vernal pool branchiopods (e.g. vernal pool fairy shrimp), the presence of these invertebrates is considered very likely given the characteristics of on site vernal pools and the fact that adjacent properties (e.g. Moore Ranch mitigation site, and Orchard Creek mitigation bank) support vernal pool fairy shrimp and/or California fairy shrimp.

The commenter suggests that the 660 acre Antonio Mountain Ranch property is small in size, and that it is surrounded by land being proposed for inclusion in the City of Lincoln expansion. While the property may fall within this greater proposed expansion area, it should be further recognized that this property is situated immediately west of the Orchard Creek mitigation bank and east of the Moore Ranch mitigation property to the west. Additionally, the property is located adjacent to Orchard Creek just east of its confluence with Auburn Ravine. Both Orchard Creek and Auburn Ravine are protected from development due to the presence of expansive floodplains in this area. Lastly, there are other conservation properties in the vicinity including

the Aitken Ranch preserve on Auburn Ravine to the west and the Del Webb vernal pool grassland conservation areas to the east. Collectively these properties comprise approximately 1,695 acres of preserved gross land consisting primarily of vernal pool grassland (see Revised Draft EIR Figure 4.4-7). The Redwing property is also situated within a much larger regional preserve context. The Yankee Slough mitigation site lies immediately to the west of Redwing property. Over 2 miles of Coon Creek to the south and east of Redwing is proposed for permanent conservation as a part of the Teichert Aggregate Mine project. Over 500 acres of the Redwing property have been identified as an Important Concentration Area for wintering and migrant birds (Jones & Stokes 2003). These properties collectively comprise approximately 5,810 acres of contiguous land, not including additional preserves that are located only a short distance to the north (e.g., East Sheridan).

Per Jones & Stokes (2003) the Lincoln Ranch property, located farther to the west, contains 676 acres of “grassland pasture” that have been identified as an Important Concentration Area for wintering and migrant birds. Although in recent years, the majority of the property has been under rice production (and it is unclear why the “grassland pasture” designation was originally applied), it is reasonable to assume that, if taken out of rice production, it would function as an “important grassland pasture concentration area”, as mapped by Jones & Stokes (2003). In the interim, the bulk of the property is likely functioning as “important farmed agriculture concentration area”, as this designation was applied to the southernmost 195 acres of Lincoln Ranch in Jones & Stokes (2003)

The commenters correctly stress the importance of critical grassland management tools such as burning and grazing. The importance of these management practices is acknowledged. These are important components of long-term management plans which are currently, or will be, required by preserve Operations and Maintenance Plans for these areas. Also see Response to Comment 24Y.

Response 24U: Commenters claim that the standards for habitat mitigation are wholly inadequate. The Placer County General Plan policies support the preservation and enhancement of natural land forms, natural vegetation and natural resources as open space to the maximum extent feasible. The County will permanently protect, as open space, areas of natural resource value, including wetlands preserves, riparian corridors, woodlands, and floodplains (see e.g., Policies 6.E.1 and 2). With these policies in mind, the Placer Vineyards Specific Plan focuses on the preservation of 1 acre of open space for every 1 acre of open space impacted as a result of Specific Plan development. Thus, while it is true that additional development in western Placer County has been approved and may be approved in the future, the Placer Vineyards Specific Plan mitigation strategy is designed to offset the impacts to open space and agricultural lands associated with the Specific Plan development and not the effects of other development outside the Specific Plan.

The U.S Fish and Wildlife Service’s Recovery Plan for vernal pool grassland ecosystems establishes as a recovery objective the preservation of 85% of suitable vernal pool habitat within the Western Placer County Core Area for several key vernal pool species covered by the

Recovery Plan.¹ A portion of western Placer County is located within the Southeastern Sacramento Valley unit and is a specified “core area” under the Recovery Plan. Core areas are ranked as Zones 1, 2 or 3 in order of their overall priority for recovery (Final Plan, page III-6). In general, the Recovery Plan indicates that the USFWS considers “recovery recommendations in Zones 2 and 3 to be more flexible than Zone 1, and recovery criteria specific to Zone 2 and 3 core areas may be modified on a case by case basis based on future information” (Final Plan, page III-6). Western Placer County is identified as a Zone 2 priority core area for vernal pool fairy shrimp. Thus, the recovery criteria may be applied on a case by case basis with greater flexibility than if the area were designated as Zone 1.

The Recovery Plan acknowledges that protection of the best vernal pool habitat is the primary method to achieve recovery of vernal pool species. Nonetheless, the plan allows for alternative strategies such as development of conservation plans or other site-specific planning methods to conserve species habitat and meet the recovery criteria described in the plan. Thus, in addition to the on-site preservation and avoidance of 714 acres of natural open space within the Specific Plan Area, Revised Draft EIR Mitigation 4.4-1a provides for the preservation of more than 3,490 gross acres of open space including 286 acres of waters of the U.S. (comprised of approximately 162 acres of vernal pool complex habitat and 124 acres of other wetlands/waters). Additionally, 284 acres of restoration and creation opportunities would be provided as part of this mitigation, including approximately 142 acres of vernal pool complex habitat. The Recovery Plan specifically contemplates adaptive management, restoration, creation and monitoring of vernal pool habitat to assist in the promotion of population stability and to eliminate or ameliorate threats to vernal pool species (see e.g., Recovery Plan, pages III-6 to III-10). For these reasons, Revised Draft EIR Mitigation Measure 4.4-1a is consistent with the Recovery Plan.

Mitigation ratios applied to other projects in the context of a settlement agreement do not necessarily indicate the applicable mitigation ratio that should be applied to a different project with different habitat characteristics. Neither the County nor other applicable agencies have adopted specific mitigation standards requiring 2:1 mitigation although Placer County General Plan Policy 6.B.5 does state that higher ratios may be required by the County.

Also, see Response to Comment 15I.

Response 24V: Commenters claim that Mitigation Measure 4.4-1 is vague and uncertain. As indicated on page 4.4-94 of the Revised Draft EIR, mitigation would be approved and implemented as permitted in the independent regulatory processes administered by the Corps, U.S. Fish & Wildlife Service and the California Department of Fish & Game. In addition to the 1,000 acres of open space proposed to be set aside prior to ground disturbance (see Applicant-Initiated Mitigation Proposal), the remainder of the required mitigation (including wetland preservation and/or habitat restoration, creation, or enhancement) would be met on an incremental basis as development of individual projects proceeds. Thus, the mitigation measures described in the Revised Draft EIR are intended to serve as the basis for the compensation ultimately obtained by the wildlife agencies as part of the Section 404 permit process. The

¹ However, suitable habitat is not defined in the Recovery Plan.

acceptability of the mitigation measures will not be left to the market or developers. The mitigation measure defines the mitigation necessary to avoid and mitigate significant impacts to biological resources for purposes of CEQA, and provides standards for judging compliance even if State and federal permitting processes were not applicable. Nonetheless, even with implementation of the mitigation, the Revised Draft EIR explains that the loss of open space will remain a significant and unavoidable impact (see e.g., page 4.4-95).

Mitigation Measure 4.4-1b incorporates vernal pool restoration, not creation as a measure for compensating for impacts to vernal pool species. In some cases preservation and restoration mitigation objectives may be accommodated on the same parcels. In other cases separate parcels may be needed to satisfy both objectives.

Restoration of wetlands will be preferred over creation of wetlands. Actual mitigation requirements will be based on the relative habitat function of vernal pool habitat impacted and the habitat function sought to be preserved and restored/created. In this context, restoration and creation are intended to construct vernal pools at densities within the range of historical levels as identified on the 1937 aerial photos, or other valid historical evidence, for the proposed preserve site to be restored. Restoration is the reestablishment of prior-existing naturally-occurring wetlands in their approximate prior-existing distribution. This involves reestablishing microtopography and hydrology appropriate to the formation of vernal pools and other seasonal wetlands. Creation is essentially the same process, but conducted without benefit of historical cues.

Response 24W: The commenter states that Table 4.4-3 omits three special status bird species that occur on site. While the County is not aware of any data documenting the presence of these species, it is agreed that they represent potentially occurring species.

Cooper's hawk has been added to Table 4.4-3 as a potential wintering and potentially nesting species. Sharp-shinned hawk has been added to Table 4.4-3 as a potential wintering species and Yellow warbler has been added to Table 4.4-3 as a potential migrant. Please see Revised Table 4.4-3 in the partially Recirculated Revised Draft EIR, August 2006.

The site may support potential California black rail habitat. Preliminary reconnaissance surveys and review of available aerial photography and wetland delineations have identified potential rail habitat in eight property ownership units (i.e., #1, #3, #4a, #5c, #7, #8, #15, and #19). Field surveys will be conducted by a qualified biologist prior to any site construction within appropriate habitats (i.e., marshes and drainages with emergent vegetation). If determined to be present, mitigation measures will be developed in consultation with CDFG. Also, see Response to Comment 24S and Partially Recirculated Draft EIR, Revised Table 4.4-3.

The potential for western burrowing owl occurrence on-site is diminished by various farming/land-use practices on-site such as flood irrigation and periodic plowing. Nonetheless, the potential for occurrence is considered medium (Revised Draft EIR Table 4.4-3). Mitigation measures for this species remain the same irrespective of its potential for occurrence.

The assessment of grasshopper sparrow occurrence would be considered “low” Revised Draft EIR Table 4.4-3). The *Seasonal Checklist of Birds of Placer County, California* (Webb 2002) documents only two individual records of this species in Placer County. The commenter states that this species breeds in similar habitat in West Placer according to Rogers, et al. (2004). Rogers, et al. (2004) merely states that “an ad. with 3 juvs. near Sheridan may be the first confirmed breeding for Placer (CIH).” A comparison to on-site habitat based upon this account cannot be made. These records indicate the extreme rarity of this species in Placer County.

Long-billed curlews may occur during spring and fall migration and appeared on Revised Draft EIR Table 4.4-3.

The commenters are referred to the Partially Recirculated Revised Draft EIR, August 2006, which addresses species described above.

Response 24X: Commenters state that the effectiveness of proposed mitigation is overstated and uses burrowing owl as an example. The mitigation measure under Impact 4.4-5 for burrowing owl is based upon the California Department of Fish and Game *Staff Report on Burrowing Owl Mitigation* (1995), which states that the “measures in this document are intended to conserve the species by protecting and maintaining viable populations of the species throughout their range in California.”

The commenters state that construction activities around active burrows are likely to impact breeding success as cited by Milsap and Bear (1988). We agree that construction activities have the potential to affect breeding success. However, Milsap and Bear (1988) also state that “with due care, nests at construction sites can be as productive as undisturbed nests; without such protection, nest failures typically results.” In this instance where the nests were successful, a 3.5-meter radius area around the nests was flagged, construction materials were stored away from the nest, and unnecessary activities around the nests were avoided. Revised Draft EIR Mitigation Measure 4.4-5 requires a 500-foot setback during construction from all active nests.

The commenters state that the assumption that owls could move elsewhere “is ridiculous.” This is an opinion that cannot be substantiated. If burrowing owls are found to occur on-site, the mitigation measures based upon the CDFG *Staff Report on Burrowing Owl Mitigation* (1995) in the Revised Draft EIR will be implemented and may likely include “passive relocation” to on-site open space areas as approved by CDFG. Furthermore, burrowing owls are known to occur in “golf courses, cemeteries, road allowances within cities, airports, vacant lots within residential areas and university campuses, and fairgrounds” (Haug, et al. 1993).

The commenters state that the history of owl relocation is “difficult and largely unsuccessful” according to Haug, et al. (1993). It should be noted that Haug, et al. (1993) states that “relocation of owls whose habitat was threatened with development has been attempted in California and Saskatchewan with some success.” The commenters cite a study by Martell, et al. (2001) to support their contention regarding owl relocation. The Martell, et al. (2001) study details the attempted reintroduction of burrowing owls into a portion of their historic range in Minnesota with juvenile owls from South Dakota. No similar such reintroduction is proposed

for this project. Without banding and tracking individual birds, it is not possible to definitively prove successful relocation. However, ECORP biologists have observed burrowing owls to occupy artificial burrows constructed as part of passive relocation mitigation programs on at least two projects.

In order to ensure that passive relocation and use of artificial burrows is successful if undertaken, Mitigation Measure 4.4-5 is hereby amended as follows:

4.4-5 When construction is proposed during the burrowing owl breeding season (April-September), a focused survey for burrows shall be conducted within 30 days prior to the beginning of construction activities by a qualified biologist in order to identify any active burrows. If active nests are found, no construction activities shall take place within five hundred feet of the nest until the young have fledged. Burrows that must be removed as a result of Specific Plan implementation shall be removed during the non-breeding season (October to March). If no active nests are found during the focused survey, no further mitigation will be required.

If burrows are removed as a result of implementation and there is suitable habitat on-site, on-site passive relocation shall be required. Owls will be encouraged to move from occupied burrows to alternate natural or artificial burrows that are beyond 50 meters from the impact zone and that are within or contiguous to a minimum of 6.5 acres of foraging habitat for each pair of relocated owls. Relocation of owls should only be implemented during the non-breeding season. On-site habitat shall be preserved in a conservation easement and managed to promote burrowing owl use of the site.

If there is not suitable habitat on-site, off-site passive relocation shall be required. Off-site habitat must provide suitable burrowing owl habitat. Land shall be purchased and/or placed in a conservation easement in perpetuity and managed to maintain suitable habitat. Off-site mitigation shall use one of the following ratios:

- 1. Replacement of occupied habitat with occupied habitat: 1.5 times 6.6 (9.75) acres per pair or single bird.*
- 2. Replacement of occupied habitat with habitat contiguous to currently occupied habitat: 2 times 6.5 (13.0) acres per pair or single bird.*
- 3. Replacement of occupied habitat with suitable unoccupied habitat: 3 times 6.5 (19.5) acres per pair or single bird.*

In the event passive relocation and use of artificial burrows is required on- or off- site, a banding and tracking program shall be established in accordance with accepted protocols to allow measurement of success. In the event the relocation program is proven not to be successful, additional steps shall be undertaken as required by the County in consultation with CDFG.

The replacement of burrowing owl habitat required by this measure could be partially or entirely included within Mitigation Measure 4.4-1, to the extent that the mitigation area includes areas appropriate for burrowing owl.

The County agrees that CDFG currently opposes active relocation. Active relocation is not proposed as mitigation in this Revised Draft EIR.

The commenter states that the assumption that relocation on-site within 50 meters of ‘impact zones’ will be successful ignores published literature. The mitigation measure clearly states that through passive relocation, the owls will be encouraged to occupy natural and artificial burrows beyond 50 meters of impact zones.

The commenter cites Gervais et al. (2003) as a basis for suggesting that burrowing owl home ranges of up to 1,000 acres were required. The full citation for this reference was not listed in the References section of the letter, but the study to which the commenter was referring was located. The home ranges documented in this study range from 2.5 acres to 746 acres. There are no data in this study to support the claim that 1,000 acres are required. Further, this study was conducted in an area of intensive agriculture within the San Joaquin Valley. The Specific Plan area is not situated within an intensive agricultural setting, or within the San Joaquin Valley.

The commenters suggest that Mitigation Measure 4.4-1 will not suffice as mitigation for a wide range of species citing several sources with respect to species’ habitat including Noss, et al. (2002). According to Noss, et al. (2002), the Swainson’s hawk “is no longer a grassland species, and thus cannot be protected through the conservation and preservation of grasslands, vernal pool, or other natural habitats.” This statement would suggest that any grassland, vernal pool or other natural habitat on-site is less than optimal for Swainson’s hawks. Irrespective of this information, the Revised Draft EIR stipulates that mitigation for foraging habitat will be based upon CDFG guidelines. Also see Responses to Comments 24V and 24Y. The Revised Draft EIR acknowledges that Mitigation Measures 4.4-1 “...would substantially lessen the significant impacts to biological resources due to the conversion of open space and agricultural land, and would preserve habitat for a variety of special status species, but will not mitigate the impact to a less than significant level.” Although the commenters seem to imply that multi-species habitat areas are less desirable than areas focused on a single species, this approach is contrary to regulatory agency initiatives to create multi-species natural community conservation areas rather than the more traditional single species approach. Regardless of the multi-species nature of the preserves, mitigation will be based on trustee agency guidelines.

Response 24Y: Commenters question whether Mitigation Measure 4.4-1 will reduce the loss of SWH foraging habitat. Commenters misunderstand Mitigation Measure 4.4-1. There are assurances that suitable SWH habitat will be preserved. As is clear from a reading of the mitigation measure, CDFG Guidelines must be met (Revised Draft EIR page 4.4-98). Other sites and additional land may ultimately be necessary to meet the Guidelines. The sites identified in the EIR are a beginning, not the final plan. Page 4.4-91 of the Revised Draft EIR contains the following statement: “The Placer Vineyards property owners have identified the five potential mitigation sites shown in Table 4.4-8, which are subject to further review by the resource agencies through the state and federal permitting process” (emphasis added). Ultimately, the amount of land obtained and preserved will mitigate impacts, per the Guidelines. Also see Responses to Comments 24T and 24V.

Commenter states that the conclusion that SWH nesting impact is less than significant is based entirely on the planting of trees. This is an incorrect observation. Virtually all of the suitable nesting trees are located in areas to be preserved in open space. This includes the Dry Creek Riparian corridor and the two upland oak woodland areas. Few, if any, nesting trees will be removed. However, in the event they are, the replacement mitigation would be applied. The planting of trees will ensure the existence of additional potentially suitable nest trees in the future.

Commenters question statement regarding creation/restoration of SWH habitat. The commenter mischaracterizes the statement (Revised Draft EIR page 4.4-106), which correctly states that “It would not be feasible to restore or create new foraging habitat to completely offset the development” (emphasis added). Given the acreage of the project, it would not be feasible to purchase enough land to create/restore the required amount of Swainson’s hawk foraging habitat. The County agrees that it is possible to restore or create potential foraging habitat through implementation of appropriate farming practices; however, preservation of a like amount, as proposed, is consistent with County General Plan policy and is not contrary to any adopted trustee agency policy.

Response 24Z: Commenters question the Revised Draft EIR content regarding tricolored blackbirds. Tricolored blackbirds prefer freshwater marshes but will also nest in blackberry brambles (see Partially Recirculated Revised Draft EIR, page 4.4-16). It is unlikely that tricolored blackbirds would nest in the on-site open space preserves given the close proximity to development after buildout. The reference to “...continue to breed successfully” by the commenters implies that they are known to breed onsite, a supposition for which no supporting data exist. There are no CNDDDB records of tricolored blackbirds nesting within the Specific Plan area nor has any evidence of nesting been observed on-site during field surveys. Should this species be found to occur on site, the proposed mitigation (Mitigation Measure 4.4-7) will address potential impacts.

Response 24AA: Commenters request that the Specific Plan, Revised Draft EIR, and Water Supply Assessment be rewritten and recirculated. Comment is noted. Although a partial recirculation of the Revised Draft EIR has been undertaken, the recirculated document focused on specific issues related to project financing, traffic and special status species. For the reasons

set forth in the responses to comments raised by the commenters, a full recirculation is not warranted. Because the County assumes the commenters are using the term “recirculation” within the meaning of CEQA, it is noted that the Specific Plan and Water Supply Assessment (prepared by PCWA) are not CEQA documents and are not subject to “recirculation.”



Friends of the Swainson's Hawk
817 - 14th St., 100
Sacramento, Ca. 95814
916-447-4956
www.swainsonshawk.org

May 19, 2006

Paul Thompson, Principal Planner
Placer County Planning Dept.
11414 B Avenue
Auburn, CA 95603

via e-mail

**RE: Placer Vineyards Specific Plan and Revised DEIR
Comment of Friends of the Swainson's Hawk On RDEIR's Analysis of Impacts of Specific
Plan Upon Swainson's Hawk and Proposed Mitigation for Impacts to SWH**

Dear Mr. Thompson,

Friends of the Swainson's Hawk has reviewed the draft Placer Vineyard Specific Plan and RDEIR, and submits this letter as comment on the analysis of impacts upon and mitigation for impacts on the Swainson's Hawk ("SWH"), listed as threatened under the California Endangered Species Act. The majority of the population of SWH in California nest within 50 miles of downtown Sacramento, and consequently are under tremendous pressure from the region's rapid urbanization. We incorporate by reference the separate joint letter of Sierra Club - Mother Lode Chapter, Friends of the Swainson's Hawk, and Sierra Foothills Chapter of the Audubon, including the excellent discussion therein pertaining to Swainson's Hawks.

A

The RDEIR is in violation of CEQA for gross understatement of the presence of SWH nesting activity within and near the Specific Plan area, and for authorization of vague and unclear mitigation measures without substantial evidence that these measures can reasonably be expected to provide mitigation for impacts on SWH affected by development within the Specific Plan area, and off-site infrastructure.

B

The RDEIR seriously understates the presence of SWH on and near the project site. The RDEIR's purported map of SWH nest sites, RDEIR Figure 4.4-5, shows two SWH nest territories located 1 and 3 miles northeast of the Specific Plan site, and one 5 miles south. The RDEIR p. 4.4-105 asserts that "no SWH nests have been observed within the Specific Plan area." The RDEIR p. 4.4-107 asserts that only one "potentially active raptor nest" was found in the Specific Plan area. This information is grossly inaccurate.

In fact, the California Department of Fish and Game maintains an updated map of SWH nests, derived from its regional database. DFG's map, ATTACHED, which was obtained via e-mail from DFG and is available to the public, shows three SWH nests within the eastern half of the proposed Specific Plan, northwest of Dry Creek, another nest in the western portion of the Specific Plan, and one approximately one-half mile north of the center of the project. Biological consultants in the Sacramento region, especially those who work on environmental documents, are well aware that DFG collects and maintains data on the SWH, including location of nest territories, The biological consultants for the RDEIR could easily have obtained this information by contacting DFG, but chose not to do so.

B cont.

RDEIR p. 4.4-1 states that the Specific Plan area was surveyed by Foothill Associates between December 1999 and February 2000. Any competent biologist knows that numerous species, including SWH are absent from the Central Valley between December and February. There is no evidence of any other wildlife surveys, except for wetland delineations. Clearly, the RDEIR's biological information, based on these grossly inadequate surveys, now outdated, is so inaccurate that it cannot be relied upon as the basis for analysis of impacts or effectiveness of mitigation measures. Analyses, conclusions, and mitigation measures which rely on these defective "surveys" are not supported by substantial evidence, and thus are violations of CEQA. New surveys should be performed in accordance with accepted protocols, by competent biologists who have expertise with SWH, and included in a Recirculated DEIR.

C

MM 4.4-6, to mitigate for removal of SWH nesting and foraging habitat requires implementation of MM 4.4-1 as pertains to SWH foraging habitat and nesting trees. MM 4.4-1 is a one-size-fits-all Open Space program which allows Open Space preservation to mitigate for loss of SWH foraging habitat.

The SWH mitigation strategy assumes that land preserved for Open Space will be adequate to mitigate for impacts on SWH. But three of the four properties proposed as "core" preserves for mitigation for multi-species impacts do not contain significant areas of grassland habitat which is suitable SWH foraging habitat. Our understanding is that three of the proposed "core" preserve sites are rice farms, which are useless to upland species such as SWH.

D

Moreover, there is no evidence in the RDEIR that there are SWH nests within reasonable foraging proximity to any of the proposed "core areas". There are large areas of the Central Valley where there is suitable SWH foraging habitat but no SWH. There is no evidence that official designation of a parcel as mitigation preserve will cause SWH to relocate to that area.

E

MM 4.4-2 states that the mitigation requirements may be fulfilled by compliance, as determined by Placer County, with the Placer County Conservation Plan, when completed. However, there is no evidence that compliance with the Placer County Conservation Plan, the content of which is still undetermined, will mitigate for impacts on SWH.

F

The mechanisms for acquiring mitigation land are contradictory. MM 4.4-1e speaks of funding for acquisition, with no discussion of adequacy of funding or timing of acquisition. However, MM4.4-1b requires all projects within the Specific Plan and off-site infrastructure projects, to

G

dedicate mitigation land to the County, by fee title or conservation easement, prior to approval of the final map or project approval.

G cont.

MM 4.41-g allows project applicants to satisfy the mitigation requirement by demonstrating control of proposed mitigation land by an option. An option will provide mitigation land only in the event that the holder of the option exercises the option and has funding to pay the price established by the option contract. There is no enforcement remedy provided if the option holder chooses to allow his/her option contract to expire, without exercise, after project completion.

H

The Mitigation Measures fail to require that land preserved to mitigate for project impacts upon the SWH have and retain those characteristics and land uses which make it suitable SWH foraging and/or nesting habitat, or be within reasonable foraging distance of known SWH nests. There is no requirement that the County even consult with DFG on the suitability of proposed mitigation acquisitions or upon the appropriateness, for SWH foraging and nesting, of the conservation easement or land management plan.

I

Land acquired to mitigate for impacts on SWH should be within reasonable proximity of the nesting and foraging territories of the SWH displaced from the project site, so that the impacted local population of SWH receives the benefit of preservation of land with suitable SWH foraging characteristics, and must be approved by DFG as suitable for the purpose intended.

J

As pointed out in the joint letter of Sierra Club, et al, certain agricultural practices, such as growing (and frequent harvest) of alfalfa greatly enhances foraging value over that of grassland. Thus, the statement that it would not be feasible to restore or create SWH foraging habitat is not true.

K

Friends of the Swainson's Hawk respectfully suggest the following as a mitigation measure, which incorporates some of the language of the Sacramento County SWH Mitigation Ordinance:

"a. Prior to the approval of grading and improvement plans, or any ground-disturbing activities, whichever occurs first, the project applicant shall acquire and preserve, through transfer of fee title or perpetual conservation easement, in the manner stated below, 1 acre of suitable SWH foraging habitat for each acre impacted by the project. Prior to committing to the preservation of any particular parcel pursuant to this measure, the project proponent must obtain approval of the mitigation parcel by DFG and County. The mitigation parcel shall be located in Placer County within five miles of the project site and within reasonable proximity of SWH nest trees, as determined by County and DFG. If the land's suitability for SWH foraging habitat is related to agricultural use on the land, the Conservation Easement or related document shall retain and protect any existing water rights necessary to maintain agricultural use of the land."

L

"b. The project applicant shall transfer said SWH conservation easement, or fee title subject to such SWH conservation easement, to the County, DFG, and a third party conservation organization (Conservation Operator"), acceptable to County and DFG. The Conservation Operator shall be a nonprofit organization having IRC § 501c(3) status. The conservation easement shall be recordable and shall prohibit any activity which substantially impairs or diminishes the land's capacity as suitable SWH foraging habitat. The content and form of the

conservation easement must be acceptable to County, DFG, and Conservation Operator. The Conservation Operator, DFG, and County shall each have the power to enforce the terms of the conservation easement. The Conservation Operator shall monitor the easement in perpetuity to assure compliance with the terms of the easement."

"c. The project applicant shall pay to County an endowment fee in an amount which will produce sufficient interest in perpetuity to operate, maintain, monitor, and enforce such conservation easement. The amount of the O and M fee shall be determined by mutual agreement of County and the Conservation Operator charged with such activity, not to exceed \$3,500 per acre. The actual amount will be calculated by use of the Property Analysis Record (PAR) software program or other generally accepted, attribute based, site specific method for calculating endowment for managing, monitoring, and enforcing conservation easements or operating preserves."

(NOTE: Sacramento County's and Elk Grove's fee for endowing O and M is approximately \$2,300 per acre, using The Nature Conservancy as Conservation Operator.)

"d. The Conservation Operator shall not sell, lease, or transfer any interest in any conservation easement or mitigation land which it acquires without prior written approval of the County and DFG. If the Conservation Operator ceases to exist, the duty to hold, administer, monitor, and enforce the interest shall be transferred to another entity acceptable to County and DFG, or transferred to County itself if approved by DFG."

The Department of Fish and Game has developed, or is developing, maps of those areas in southern Sacramento County which are deemed suitable for acquisition of parcels for SWH mitigation by Elk Grove and County of Sacramento. Such a program would simplify acquisition of SWH mitigation land in Placer County.

Thank you for considering our comments.

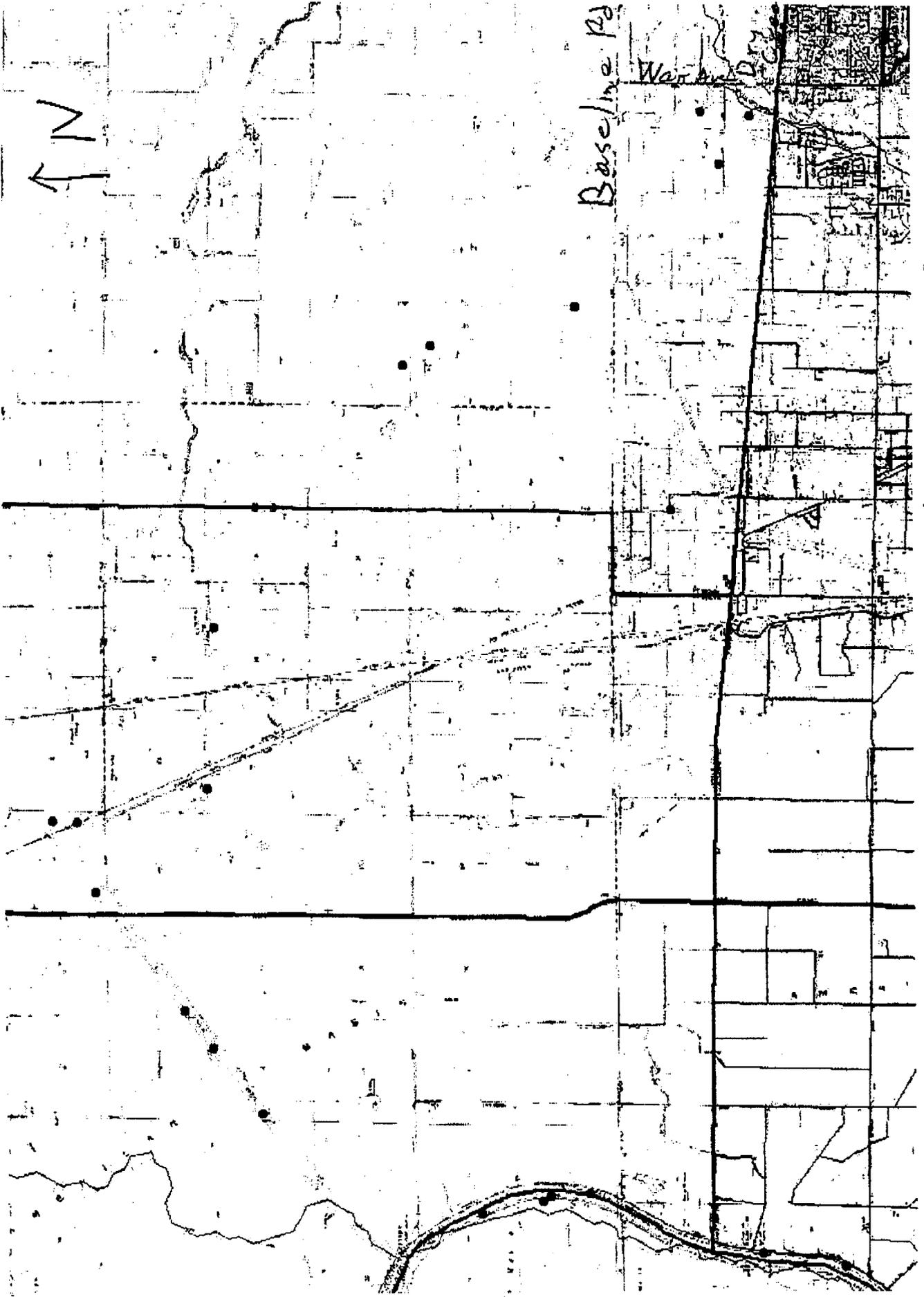
Very Truly Yours,



Jude Lamare, President,
Friends of the Swainson's Hawk

L cont.

M



From DFG Database

LETTER 25 JUDE LAMARE, FRIENDS OF THE SWAINSON'S HAWK

Response 25A: Commenter discusses pressures on the Swainson's hawk within the Sacramento region and references Letter 24 and the discussion therein. The comment is noted. Letter 24 is separately and fully responded to in this Final EIR.

Response 25B: Commenter states that the Revised Draft EIR understates the presence of Swainson's hawk (SWH) in the project area. The SWH nesting activity presented within the Revised Draft EIR was based on available data at the time of the reporting (Foothill Associates 2002 and Quad Knopf 2005). More recent field work and biological analysis was conducted for the Revised Draft EIR during the fall of 2005.

One SWH nest (Occurrence 1487) within the Specific Plan Area is included in the January 2006 CNDDDB update. CNDDDB Swainson's hawk Occurrence 1487 states that the nest was "last seen" July 2, 2001 and indicates that young were in the nest. With their recent correspondence, the Friends of the Swainson's Hawk have provided Placer County with a map of three SWH nest locations within the Specific Plan area. These three nests are not included in the most current (June 2006) update of the CNDDDB, which is administered by CDFG. Although it is reasonable to expect CNDDDB data to be updated by CDFG in a timely manner, given the unpredictable nature of the timing and accuracy of CNDDDB data, it should not serve as chief means of determining presence or absence of the species.

The County has recently become aware of a draft report prepared by CDFG titled *2001 Placer County Swainson's Hawk Survey*. The survey area included all of Placer County below 1,000 feet elevation. The survey was a windshield survey, driving public roads while searching for adult Swainson's hawks and their nests. The protocol was adapted from the Swainson's Hawk Technical Advisory Committee's standard survey protocol. Surveyors were required to search in three different time periods from March through July. The surveyors located eight active Swainson's hawk nests in the study area (two of the eight nest sites were actually a short distance outside Placer County in Sutter County). Five suspected nests were identified; however, the surveys reported no new nests not already known to the County from the map provided by Friends of the Swainson's hawk or work independently conducted for the Specific Plan EIR. Previous CNDDDB records (2001) consisted of a single nest location that surveyors were unable to confirm. The draft report concluded as follows:

Even if you include the 5 suspected nests observed during the survey, our nest density was only 1.0 nest/100km. In comparison, England's, (England et al (1995)) observed a mean nesting density of over 30 nests/100km in the Woodland/Davis area of Yolo County, just 20 to 30 miles to the west. However, England and others have spent considerable time and effort searching Yolo County for Swainson's hawk nests, whereas, this is the first time that DFG has completed a systematic search of Placer County. With the information gained during the 2001 survey a subsequent search of Placer might increase the number of confirmed nests. However, even if a subsequent search doubled, or tripled the number of confirmed nests in Placer County, the results would still be

significantly lower than the nesting densities recorded in counties like Yolo, Sacramento, or San Joaquin.

Regardless of the location of any active or historic SWH nests within the Specific Plan area, nesting surveys to determine appropriate mitigation measures for foraging habitat will be conducted as stipulated in the Revised Draft EIR mitigation measures prior to any disturbance, and will be based upon CDFG guidelines. The actual mitigation, expressed in terms of ratios, will be dependent on the findings of these surveys with, with the result that the actual mitigation imposed will be based on the conditions extant at the time of the pre-construction surveys.

Response 25C: Commenter is critical of the biological surveys performed for the project. The Revised Draft EIR analyzed various data regarding biological resources that occur or potentially occur within the Placer Vineyards Specific Plan area. These included baseline data collected during field reconnaissance surveys to characterize general plant and wildlife habitat as well as review of existing data obtained through resource agency data base queries, preliminary wetland delineation work, and other sources listed in Section 4.4.1 of the Revised Draft EIR.

The December 1999 and February 2000 surveys conducted by Foothill Associates were “general plant and wildlife surveys focusing on portions of the Specific Plan area with the potential to support special status species and sensitive habitats” (Revised Draft EIR pages 4.4-1 and 4.4-2). Thus, the surveys should clearly not be interpreted as conclusive, as SWH are generally absent from the Central Valley during December and January. Final and conclusive surveys are not required for an adequate EIR and the documentation contained in the Revised Draft EIR is fully consistent with the intent of CEQA. Mitigation measures have been provided in Revised Draft EIR Section 4.4 to ensure that detailed surveys are conducted prior to ground disturbance at the appropriate times of the year. Such detailed surveys performed today would assume a static environment and would have little meaning or value when actual construction occurred.

Response 25D: Commenter questions value of Mitigation Measure 4.4-1 for SWH. See Responses to Comments 24T, 24X and 24Y.

Response 25E: Commenter states that there is no evidence that there are SWH sites within reasonable proximity to any of the proposed mitigation sites described in the Revised Draft EIR. There are published and unpublished SWH nest records within the immediate vicinity (less than 1 mile to 2 miles) of all of the mitigation areas (see Final EIR Figure 5).

Response 25F: Commenter cites Mitigation Measure 4.4-2 and states that there is no evidence that the PCCP will mitigate for SWH. The County can find no reference to the PCCP or SWH in Mitigation Measure 4.4-2. No further response is possible. If the commenter is referring to references to the PCCP in Mitigation Measure 4.4-1, it is clear from a reading of the measure that it is not dependent on adoption of the PCCP; the requirements of the PCCP would only be applicable if the PCCP is adopted; and if the PCCP adequately addresses the species in question.

Response 25G: The commenter claims that the mechanisms for acquiring mitigation lands are contradictory. The mechanisms for acquiring mitigation land are not contradictory. Mitigation Measure 4.4-1b provides that land preserved to meet the habitat mitigation requirements of this

mitigation measure and/or any additional habitat mitigation required by other governmental agencies for a specific development project undertaken pursuant to the Specific Plan shall also be counted toward the “open space” mitigation requirement in Mitigation Measure 4.4-1 if such land is located within Placer County. For purposes of Mitigation Measure 4.4-1b, preservation of mitigation land may occur through a permanent conservation easement, fee title or purchase of mitigation credits. These are different ways that mitigation land can be secured to offset a specific project’s impacts.

Mitigation Measure 4.4-1e allows for the possibility of funding mitigation land acquisition or easement establishment, or monitoring and maintenance through the formation of a Mello-Roos CFD or other funding mechanism. This measure means that a specific project developer either can purchase the mitigation land or easement outright, or participate in an assessment district or some other funding mechanism to fund the mitigation. Timing of mitigation land acquisition is addressed in Mitigation Measure 4.4-1a and in the description on pages 4.4-91 to 4.4-94 regarding the Applicant Initiated Mitigation Proposal.

The discussion regarding the Applicant Initiated Mitigation Proposal also addresses the mitigation land that certain owners within the Plan Area have started funding and acquiring to satisfy the Revised Draft EIR’s mitigation obligations. Sufficient funding will be demonstrated through the preparation of a specific funding plan as part of an Open Space Mitigation and Management Plan. As indicated under Mitigation Measure 4.4-1a, Open Space Mitigation and Management Plans for individual preserve sites will be prepared in conjunction with specific development proposals.

Response 25H: Commenter objects to use of options during satisfaction of mitigation requirements. Mitigation Measure 4.4-1g provides that the developer of each specific development project shall be required to demonstrate control of the mitigation land by option, fee title, permanent conservation easement or mitigation credits to the satisfaction of the County and the State and federal agencies. These forms of securing mitigation land are consistent with typical forms of mitigation land acquisition. The County, State, and federal agencies would need to be assured that an option contract demonstrates sufficient control of the mitigation land, and would be guaranteed. If such assurances cannot be demonstrated, it is unlikely that the land would be approved by the agencies as mitigation.

Response 25I: Commenter asserts that EIR mitigation measures fail to ensure that land to be preserved is suitable for SWH. Where open space mitigation land acquisitions under Mitigation Measure 4.4-1a also satisfy the SWH mitigation land requirements, mitigation land acquisition will occur in accordance with the CDFG SWH Guidelines. Consequently, mitigation lands will be located within proximity to SWH nesting and foraging territories and will be subject to the review and approval of CDFG to determine the suitability of proposed mitigation acquisitions for SWH foraging and nesting habitat. As reported in Response to Comment 25E, there are published and unpublished Swainson’s hawk nest records within the immediate vicinity (less than 1 mile to 2 miles) of all of the potential mitigation areas (see Final EIR Figure 5).

Response 25J: Commenter points out that mitigation lands for SWH should be within reasonable proximity to the affected site. Comment noted. Commenter is referred to Revised Draft EIR

Figure 4.4-7. To the extent that open space mitigation land acquisitions under Mitigation Measure 4.4-1a also satisfy the SWH mitigation land requirements, mitigation land acquisition will occur in accordance with the CDFG SWH Guidelines. Consequently, mitigation land would be located within proximity to SWH nesting and foraging territories and will be subject to the review and approval of CDFG. As reported in Response to Comment 25E, there are published and unpublished Swainson's hawk nest records within the immediate vicinity (less than 1 mile to 2 miles) of all of the potential mitigation areas (see Final EIR Figure 5).

Response 25K: Commenter asserts that the Revised Draft EIR statement that it would not be feasible to restore or create SWH foraging habitat is not true. The County is unable to find the referenced statement in the Revised Draft EIR. Page 4.4-106 does, however, contain the statement that “[i]t would not be feasible to restore or create new foraging habitat to completely offset the development” (emphasis added). The County recognizes that alfalfa is valuable foraging habitat and could be planted to create enhanced foraging habitat. Also, see Response to Comment 24Y.

Response 25L: Commenter proposes additional mitigation for SWH. Mitigation Measure 4.4-1 requires preservation off-site SWH foraging habitat at ratios recommended by the CDFG Swainson's Hawk Guidelines which calls for 1:1 replacement for each acre lost within one mile of a nest, 0.75:1 for each acre lost within one to five miles of a nest, and 0.5:1 for each acre lost within 5 to 10 miles of a nest. Because Mitigation Measure 4.4-1 calls for preservation of open space at a 1:1 ratio, the highest ratio required by the CDFG Guidelines, CDFG recommendations would likely be met. Regardless of whether sites currently proposed for mitigation are ultimately found to be suitable in their entirety for SWH, SWH habitat will be replaced at 1:1 ratios with suitable habitat meeting CDFG guidelines.

Because Mitigation 4.4-1a requires preservation of open space at a ratio of 1 acre of mitigation land for each acre impacted, the proposed mitigation is consistent with the mitigation land acquisition ratio specified in the commenter's proposed mitigation measure (a). Additionally, open space mitigation lands will be required by the County as necessary to meet the standard, and will be secured through acquisition, conservation easement or options as described above in Response to Comment 25H. Mitigation lands generally will be located in Placer County unless determined suitable by the County under Mitigation Measure 4.4-1c.

With respect to recommended item (b), the Open Space Mitigation and Management Plan will document the disposition of any mitigation lands secured by conservation easements or fee title acquisition. It is anticipated that most conservation easements will be transferred to a third party conservation organization with the County and/or CDFG as a third party beneficiary with the right of enforcement.

With respect to recommended item (c), fees for mitigation land management and monitoring will be specified in the specific funding plan included in the Open Space Mitigation and Management Plan when the actual characteristics of the mitigation land are known. For recommended measure (d), transfers of conservation easements will be conducted in accordance with standard conservation easement language.

Response 25M: The development of habitat specific maps, as recommended by Friends of the Swainson's hawk, is under active consideration by Placer County. The development of maps identifying prime habitat for SWH would simplify the acquisition of SWH mitigation land in Placer County. Currently Placer County is in the advanced stages of completing a Habitat Conservation Plan and a Natural Communities Conservation Plan for western Placer County. As a result, detailed habitat maps have been developed, using vegetative cover analysis at both the landscape and parcel scale (1/10th acre minimum mapping unit), identifying suitable habitat for not only SWH, but an additional 33 special status species. Although not a subject of this EIR, Placer County is in the process of determining whether to adopt a Swainson's hawk mitigation policy similar to the City of Elk Grove and the County of Sacramento.

**PLACER COUNTY
LOCAL AGENCY FORMATION COMMISSION**

Robert Weygandt (County); David Lake (Special Districts); Brett Storey (City); John Moberly (Special Districts); Bill Santucci (County); Spencer Short (City); E. Howard Rudd (Public), Chair
145 Fulweiler Ave, Suite 110, Auburn California 95603
530-889-4097 FAX: 530-886-4671

Via Facsimile

May 19, 2006

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

RE: Placer Vineyards Revised Draft EIR

Dear Ms. Lawrence:

Thank you for the opportunity to review the Placer Vineyards revised Draft EIR (EIR). Placer LAFCO would be considered a Responsible Agency, and would utilize the EIR in evaluation of any proposals, depending on various options outlined in the EIR.

The EIR appears adequate for review of proposals that may be required by Placer LAFCO. However, potential options available for the project, including those detailed in the EIR may require approval from Sacramento LAFCO. Any change of organization involving in the Sacramento Metropolitan Fire Protection District and/or Sacramento Municipal Utility District could require approval from Sacramento County LAFCO, as they are the Principal County for these districts. Under the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, the principal county is the county having a greater portion of the assessed value of taxable property within a district. Although it is possible for Sacramento LAFCO to transfer jurisdiction to Placer LAFCO for any such proposal, the feasibility of such is unlikely due to the small amount of territory of these districts currently within Placer County. Sacramento LAFCO should be considered a responsible agency for purposes of the selection of either of these options.

A

I would also like to reiterate concerns raised in previous LAFCO correspondence, in that in the formation of a major new community such as this, one can anticipate a desire for self-governance emerging. The proposal currently relies on services provided by many very large single service agencies. Policies of both the Cortese-Knox-Hertzberg Local government Reorganization Act of 2000 and Placer LAFCO encourage provision of services through multiservice agencies instead of a combination of single purpose agencies. Formation of a

B

Community Service District (CSD) could provide long-term management of services and infrastructure that will be needed in the project area.

In general, LAFCO is primarily concerned with encouraging the orderly formation of local government agencies, preservation of agricultural and open space, and to discourage urban sprawl.

B cont.

Please feel free to contact Kris Berry, Executive Officer regarding any questions you may have and to facilitate the submittal of any proposals.

Sincerely,



Kristina Berry, AICP
Executive Officer

Cc: Sacramento LAFCO

LETTER 26 KRISTINA BERRY, PLACER LOCAL AGENCY FORMATION COMMISSION

Response 26A: Commenter requests that the Revised Draft EIR recognize Sacramento County LAFCo as a responsible agency. The County does recognize that the Sacramento County LAFCo may be a “Responsible Agency” of the proposed project, as defined in Section 21069 of the CEQA Guidelines. All published CEQA documents for the proposed project have been distributed to Sacramento LAFCo in order to obtain comments from the agency pursuant to CEQA Guidelines Section 21104. Revised Draft EIR Table 3.6-1 (page 3-35) is hereby amended to add Sacramento County LAFCo as responsible agency for service area adjustments:

Revised Table 3.6-1	
Approvals and/or Permits from Other Agencies	
Approval and/or Permit	Agency
Reorganization (Annexation/Detachments) for service area boundary adjustments, and/or service contracts	Placer County LAFCo PCWA <u>Sacramento County LAFCo</u>
School district boundary changes	Grant Joint High School District, Center Unified School District, Elverta Joint School District, Placer County Board of Education
National Pollutant Discharge Elimination System Storm Water Discharge Permit Section 401 of the Clean Water Act	Regional Water Quality Control Board
Section 404 of the Clean Water Act	U.S. Army Corps of Engineers
Streambed Alteration Agreement	California Department of Fish and Game
Endangered Species Acts	California Department of Fish and Game, U.S. Fish and Wildlife Service
Improvement Plans, Encroachment Permits, Right of Way Acquisition	Placer County Air Pollution Control District, Placer County Water Agency, California Department of Forestry and Fire Protection, Dry Creek Fire Department, California American Water Company, Sacramento Suburban Water District, San Juan Water District, Sacramento Regional County Sanitation District, City of Roseville, Sacramento County, Sutter County, Roseville Public Cemetery District
Wastewater Treatment, Initial and Long-Term	South Placer Wastewater Authority Sacramento Regional County Sanitation District City of Roseville U.S. Fish and Wildlife Service County of Placer South Placer Municipal Utility District Regional Water Quality Control Board
Agricultural Water Supply, per Development Standard 8, Exhibit 1 of the <i>Dry Creek/West Placer Community Plan</i>	City of Lincoln
Recycled Water Provider Agreement	City of Roseville
<u>Designated Floodway Encroachment Permit</u>	<u>State Reclamation Board</u>

Response 26B: Commenter encourages the formation of a multi-service agency to serve the Plan area. The Revised Draft EIR includes several mitigation measures requiring the formation of a County Service Area (CSA) or the establishment of a Zone of Benefit within the existing Placer County CSA #28 to provide certain ongoing public services and infrastructure within the Specific Plan area. These services include: fire protection services (Mitigation Measure 4.11.2-2c and 4.11.2-3b), wastewater services (Mitigation Measure 4.11.6-1a), drainage services (Mitigation Measure 4.11.9-2), library services (Mitigation Measure 4.11.12-1a), and parks and recreation services (Mitigation Measure 4.11.13-3). Additionally, Specific Plan Policy 9.6 requires all properties within the Specific Plan area to be annexed into an existing County Service Area or other special district established for maintenance of certain facilities that provide special benefit to the Plan area prior to receiving these services.

A County Service Area (CSA) is similar to a Community Services District (CSD) in that it is multi-service and is administered by the Board of Supervisors. Annexation of the Plan area into a CSA or other multi-purpose special district, as required by the Specific Plan and the Revised Draft EIR, will provide long-term management of the above mentioned public services and infrastructure to the Specific Plan area.



State of California - The Resources Agency

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME<http://www.dfg.ca.gov>

Sacramento Valley - Central Sierran Region

1701 Nimbus Road, Suite A

Rancho Cordova, CA 95670

916/358-2900



May 19, 2006

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

Dear Ms. Lawrence:

The Department of Fish and Game (DFG) has reviewed the Draft Placer Vineyards Specific Plan and the Revised Placer Vineyards Revised Draft Environmental Impact Report (DEIR) (SCH# 1999062020). The DEIR analyzes the environmental impacts associated with approval of the draft Specific Plan on 5,230 acres located in western Placer County. Two Specific Plans have been proposed, however the DEIR remains the same for both plans. The Specific Plans include development of from 14,000 (consistent with 1994 Placer County General Plan) to 22,000 (consistent with Sacramento Area Council Of Governments Blueprint) dwellings plus commercial and industrial development. About 714 acres are identified as Open Space, primarily located along drainage areas and utility corridors. The DEIR evaluates impacts associated with about 4,251 acres within the Specific Plan area with the remainder to be used as large lot rural residential development consistent with current zoning. The DFG provided comments to Placer County, dated December 29, 2004, identifying our concerns regarding the prior project DEIR.

Significant natural resources of the plan area includes stream and riparian habitats including Dry Creek, providing habitat for federal and state listed fish and federal listed invertebrates, wetlands including vernal pool grasslands and associated federal listed invertebrates, and both nesting and foraging habitat for the state listed threatened Swainson's hawk (*Buteo swainsonii*). Specifically, the area, according to the DEIR, supports about 172 acres of various wetland types including about 113 acres of depressional wetlands such as vernal pool, stock ponds and drainage swales and about 59 acres of riverine wetlands such as creeks, canals/ditches and riverine marshes. The area in and around the site of the proposed project also provides important resting and foraging habitat for winter migrant bird species including waterfowl of the Pacific Flyway. The majority of the project site is undeveloped although a small acreage of rural residential development occurs primarily along the west boundary.

The site remains primarily a large block of habitat. The site is one of only several locations remaining in west Placer County that provides, based on work completed by Placer County, over 2,000 acres of vernal pool grassland habitat in a county that

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supports only about 20,000 acres, only a small percent of historical levels of this habitat type in this area. The proposed project, along with other reasonably foreseeable proposed or considered development in western Placer County, pose significant risk to at least 50%, or more, of the remaining vernal pool/grassland habitat in western Placer County.

The DFG is providing comments in response to the DEIR under CEQA as both a responsible and trustee agency. As trustee for the State's fish and wildlife resources, the DFG has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of such species. In that capacity, DFG administers the California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and other provisions of the California Fish and Game Code that affords protection to the State's fish and wildlife trust resources. The DFG believes, that to the extent environmental impacts associated with our jurisdiction are affected, selection of either Specific Plan results in similar direct impacts to wildlife.

A cont.

The DFG would like to offer the following comments regarding the adequacy of the DEIR:

Existing conditions

The document repeatedly refers to the Placer County Conservation Plan (PCCP) for a variety of purposes and other sections within the DEIR. The county has been in the planning phase of this conservation effort for several years but has not yet committed to the completion or implementation of the plan. References to the PCCP, comparisons between the purported nature of the PCCP and this DEIR and other discussion of the PCCP in the DEIR, other than a brief discussion of the status of the PCCP, are speculative and potentially defers to some subsequent action. We do not believe that discussion in the DEIR, beyond noting that the county is in the planning phase of this effort, is warranted and that all other discussion is confusing and irrelevant. We recommend removal of this type of discussion from subsequent documents.

B

The document has focused all discussion and analysis on listed and sensitive species and ignored the contribution that the project site provides, due to the large non fragmented nature of the area, to the abundance and diversity of wildlife in the Central Valley. Broadly, this is a significant omission. This is critically noted by the total absence within the document of any information on the status of and thus evaluation of project impacts to water oriented birds of the Pacific Flyway or to winter migrant raptors. Policy 6.C.1 identifies both of these resources as worthy of protection. Again, in the

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DFG letter of December 2004 on the prior DEIR, the DFG suggested that the area provides important resting and foraging habitat for winter migrant birds. Continued omission of this issue is, fundamentally, a crucial failure in light of the Federal Migratory Bird Treaty Act and the document prepared by Jones and Stokes for Placer County in May 2003 titled, "Important Migrant and Wintering Bird Concentration Areas of Western Placer County" that identifies portions of the project area providing an "Important Concentration Area" for winter migrant birds.

C cont.

Failure to fully disclose existing conditions results in the document failing to fully evaluate project impacts and thus adequately provide reasonable and feasible mitigation measures.

Analysis of Impacts

The document concludes that development will result in the loss of 3,520 acres of habitat. We disagree with this conclusion.

We believe that the DEIR generally understates the significance of the project site to wildlife resources by focusing analyses on listed species while ignoring the value of the site as a large block of unbroken resources providing habitat for a broad array of wildlife species critically important habitat at a local, regional and national level. This is abundantly clear by the failure to analyze project impacts to winter migratory waterfowl of the Pacific Flyway and winter migrant raptors.

D

Additionally, the DEIR significantly overstates the value of 714 acres of lands retained onsite and thus understates project impacts. Statements within the DEIR concluding that project impacts to retained onsite resources are less than significant are not supported by any evidence and, in fact, are countered by published scientific literature.

Specifically, Section 4.4-12, whereby riparian areas are avoided, erroneously concludes that project impacts are considered as "less than significant". Fragmentation as a result of project implementation, adjacent land uses and long-term use of the riparian system focused as drainage areas will result in direct and cumulative impacts to onsite riparian habitats and associated wildlife. Conclusions in this regard are not based on any factual information within the document, merely that avoidance results in impacts of less than significant.

E

Simply, fragmenting large habitat areas into smaller ones reduces the total number of species that can be supported in an area (MacArthur and Wilson 1967). The relationship between species number and area usually fits the equation: $S = CA^Z$

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where S = the number of species, C is a constant, A is area, and z is the slope of the line. Values of z for totally isolated areas (e.g., oceanic islands) usually range between 0.25 and 0.35, and they usually range from 0.12 to 0.18 for semi-isolated habitat patches within land areas (Rosenzweig 1995, Chapter 2). Thus, if a 1,000-acre patch of vegetation supports 100 species of birds, the species/area relationship predicts that a 500-acre patch will support about 90 species and a 100-acre patch will support about 70 species, the exact numbers depending on the observed values of z and C . Furthermore, the bird communities on the smaller patches will be nested subsets of the largest one, and smallest patches will support only common species with minimal resource requirements (Brown and Lomolino 1998, pp. 414-418). The rare species, often the objects of conservation concern, generally will be lost from the system if large areas are fragmented as proposed by this project. This issue has been ignored in the DEIR.

E cont.

Additionally, the negative association between habitat size and extinction risk is one of the most pervasive observations in ecology (MacArthur and Wilson 1967, Diamond 1975, Schoener and Schoener 1983, Burkey 1995, Hokit and Branch 2003). The relationships between habitat size and extinction risk are most often explained by random processes acting differentially on small and large populations (Richter-Dyn and Goel 1972, Shaffer 1981, Gilpin and Soule 1986, Goodman 1987), although relationships between area and extinction risk also may be associated with deterministic factors that change with patch size (Connor et al. 2000, Matter 2000, Hokit and Branch 2003). Patch area, patch shape, and patch isolation all influence extinction risk through edge effects (Lovejoy et al. 1986), allee effects or negative density dependence (Morgan 1999), inbreeding depression (Frankham 1998, Saccheri et al. 1998, Nieminen et al. 2001), dispersal rate (Stamps et al. 1987), fecundity (Robinson et al. 1995), survival (Robinson et al. 1992), predation rates (Robinson et al. 1995) individual growth (Pearman 1993), and population density (Robinson et al. 1992).

F

These are crucial issues for evaluating project impacts to retained onsite lands in general, and specifically to retained onsite riparian systems that are designed as stated in this document principally as drainage areas. Lack of any ability for long term management for all onsite lands further reduces their value and the likely need, although not discussed in this document, for routine flood control maintenance of the stream environment further impacts long term value. Combined, these issues can only be further evidence that the value of onsite areas will be minimal and thus the document has erred in conclusions regarding project impacts.

In total, we have concluded that the 3,520 acres of land stated as being impacted as the result of project implementation substantially understates project

G

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impacts. We believe that direct project impacts to biological resources results in the loss of 4,251 acres.

Proposed mitigation

The DEIR has generally understated mitigation needs due to either failure to identify impacts, as noted above, or overstating the value of proposed mitigation. Failure to identify impacts results from the lack of discussion of the issue, such as the value of the site to winter migrant birds, or flawed and unsubstantiated conclusions about the degree to which the project will impact biological resources, such as the value of retained onsite land. Overstating the value of proposed mitigation thus becomes the focus of the following discussion.

Mitigation measure 4.4-1a concludes, without support, that "It would not be feasible to create 3,520 acres of new open space to offset development of the Specific Plan area." The measure further states that "One acre of open space will be preserved within Placer County for each acre of open space impacted within the Specific Plan area". Mitigation measure 4.4-1b, Habitat Mitigation, subsequently defers to future state or federal actions making further assertions that the requirements of the state or federal actions will also be applied toward the open space requirement of 1:1. The document lacks any reasoned analysis by which these, or in fact any ratios, have been derived.

Generally, as discussed above, mitigation that trades large patches for small ones, even at two or three times the total area, provide inadequate mitigation and are very poor conservation strategies. For example, one 1,000 acre patch of vernal pool/grassland mitigated by 20 or even 30 isolated patches of 100 acres each result in highly elevated extinction risks for the species of conservation concern as their populations become reduced in numbers and isolated.

The DEIR proposes an initial "core" conservation area of 1,000 acres followed by areas of at least 200 acres in size but with no additional required standards that these added lands be adjacent to an established reserve, although this is suggested. The total acreage of a compensation area is not declared other than it is not feasible to provide 3,520 acres. The DEIR correctly suggests the appropriate need to mitigate by the desire to build and connect mitigation areas. The mere fact of increasing connectivity among the mitigation areas can reduce extinction risks, and a metapopulation (an array of local populations some of which occasionally become extinct but are recolonized by dispersal from extant ones) theoretically may have lower extinction risks than large populations (Hanski 1999). However, there are few examples of functional metapopulations (Harrison 1991), and assuming that a large population in

G cont.

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one place can be replaced by a functional metapopulation in another is very risky. It is far more likely that most of the small patches will become population sinks (Pulliam 1988) for the species of conservation concern. Additionally, as noted in the discussion regarding project impacts, providing a series of smaller reserve areas, as proposed in the DEIR, as mitigation for the loss of a large unbroken area, as is the existing project condition, reduces the total number of species that can or will occur within the conserved areas. The DEIR thus overstates the value of the proposed strategy to mitigate project impacts.

H cont.

Many of the statements in the Mitigation Strategy section (page 4.4-90 and 91) are factually incorrect and misleading including:

- Page 4.4-90, sentence 1: while county staff may have developed a mitigation strategy, any implication that this strategy is supported by state and federal regulatory agencies is incorrect.
- Page 4.4-91, paragraph 1: while the county goal to devise a mitigation strategy for this DEIR may be based on the desire by the county to have this mitigation program simultaneously satisfy relevant state and federal regulatory actions, this document fails to achieve such a goal.
- Page 4.4-91, paragraph 3: The requirements of CEQA, in our view, have not been met as asserted in this paragraph.

We have concluded that this section, in entirety, is inaccurate, misleading, irrelevant and confusing and should be deleted.

The Applicant Proposed Mitigation Strategy (Page 4.4-91), also has serious and fundamental flaws.

Generally, deferral within this document of specific locations, current and potential uses, size and adjacent land use of offsite land proposed for mitigation does not allow for the DFG to fully evaluate the degree to which project impacts are being mitigated. The inclusion of in depth discussion of probable or likely properties that may be considered for mitigation by project applicants is irrelevant since the document repeatedly asserts these areas as "proposed" or "potential". Generally, discussion of potential mitigation sites that may be offered by developers including discussion of onsite resources of these potential areas or the degree which these sites may, or may not be used, to mitigate project impacts is speculative and irrelevant. These discussions, unless parcels are fully committed as part of the DEIR, should be deleted

J

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from the DEIR and a specific set of standards that could be applied to any parcels identified in the future for mitigation must be developed.

Subsequently, the use of "ratios" as the single means to mitigate project impacts has concluded, without proper analysis of specific locations of mitigation areas, that the ratio alone provides mitigation when no offsite properties by which to judge biological efficacy can be done. Conclusions and mitigation based on "potential" properties is without merit and cannot be substantiated. Thus the ratios must be suspended until or when properties are proposed that allow for evaluation of the properties from the perspective of their biological integrity and long term conservation value.

J cont.

Additionally, deferral of specific long term management, monitoring and adaptive management strategies of either offsite or onsite lands or reference to a not yet existent PCCP does not allow for a full understanding of the values potentially achieved on these lands through time.

For example, we recommend that the conservation value for vernal pool/grassland areas could be estimated by considering the following factors.

- Area quality. This includes factors such as number of pools lost/gained, the extent of disturbance (undisturbed VP/grassland complex, some disturbance (discing), but topography still evident, rice).
- Area shape. Long, narrow patches have more edge per area and thus less conservation value than square patches. The area/perimeter ratios of the proposed development and the proposed mitigation lands should be equal.
- Internal fragmentation. Mitigation lands with patches of natural vegetation in a matrix of highly disturbed areas are much less valuable than those that are all natural vegetation. Thus, one index of internal fragmentation is the relative proportions of natural vegetation and highly disturbed areas (e.g., agricultural fields). Another is miles of roads, powerline rights-of-way, or other linear features/unit area.
- Matrix permeability between nearest neighboring reserve is important for dispersal among reserves. This could be estimated by considering the percentages of paved surfaces, developed land, agricultural land, and natural vegetation in the intervening areas.
- Ability to manage preserve areas and the degree to which adjacent land uses may impair or impede this ability.

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Mitigation strategies for other habitat types must be similarly developed based on scientific principles as identified within this letter. Additionally, as we suggested in-or December 29, 2004 letter, we suggest that all impacts to riparian habitat be accomplished only offsite and that no credit is given to any restoration effort of riparian or drainage areas onsite. The planting of trees within onsite drainage areas to mitigate impacts to riparian habitat ignores the degraded value of onsite riparian systems within an urban matrix. Scientific literature supports the position of the DFG and the DEIR provides no information to support conclusions within the DEIR that there is even a reduction of the level of impact by the planting of trees onsite. This is a situation where offsite enhancement is clearly superior, reasonable and feasible and the DEIR has failed to include a substantive analysis of this issue.

L

Any mitigation proposed in this DEIR and any subsequent actions proposed through mitigation measures must be able to stand in the absence of a PCCP. Any discussion in these sections referring to or basing decisions on a PCCP should be deleted. Additionally, due to the difficulty of assuring appropriate operation and maintenance for lands encumbered as part of mitigation for project actions, we recommend that all lands acquired as mitigation lands be obtained in fee title and that easements not be considered.

M

N

We have concluded that a minimum acreage of 4,251 acres would be required to mitigate project impacts to biological resources. This would result, through time, in approximately one-half of the existing biological resources being lost. This acreage, however, is dependent on the size of the areas conserved and the integrity of the resources within the proposed mitigation areas. Generally and at the least, the poorer the quality of the existing habitat proposed as a mitigation area, the smaller the proposed site, the potential isolation of the proposed site and the immediacy of the site to incompatible land uses could all result in acreage greater than 4,251 being required to mitigate project impacts. These criteria, and their relationship to the value of mitigation lands, were not fully or appropriately considered within the analysis of "potential or proposed" mitigation sites as discussed within the DEIR

O

Analysis of Alternatives

Significantly, the DEIR has not addressed any alternative design scenario that includes retention within the specific Plan area of large areas of existing vernal pool grassland that could provide for functional habitat through time. This would be considered an alternative design based on biological constraints. The DFG has raised this issue both in our letter of June 30, 1999 to Placer County regarding the Notice of Preparation for this project and on the prior DEIR for this project dated December 29, 2004. We, again, believe that the omission of an alternative design as recommended precludes the county from concluding that offsite mitigation for all project impacts is

P

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superior to onsite avoidance. Simply the DEIR has not fully evaluated alternatives to allow for a clear understanding of the ability for development to proceed within the Specific Plan area that fully considers options that are both reasonable and feasible and may allow for most of the project objectives to be achieved. A fair argument has not been made that there are no areas onsite that are suitable for long term mitigation. The document provides neither a discussion nor an analysis that would lead the document to conclude that offsite mitigation is preferential to onsite avoidance. This becomes critical upon consideration of the Vernal Pool Recovery Plan recently finalized by the U.S. Fish & Wildlife Service that directs vernal pool conservation in this area to be achieved by the retention of 85% of the vernal pool resources. The DEIR notes existence of the Recovery Plan but fails to discuss the plan or any implications of the Recovery Plan for this project. Statements regarding the need for offsite mitigation as the sole means to mitigate project impacts to wildlife resources are thus either absent or conclusory and unsupported by factual information.

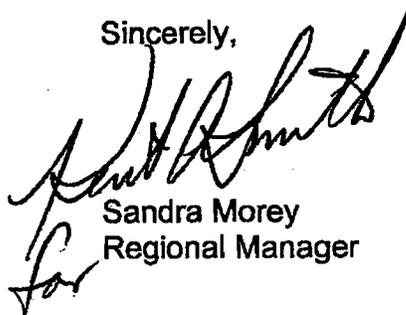
P cont.

The DFG believes that the DEIR has not adequately evaluated the proposed Placer Vineyards Specific Plan. We recommend that the document be revised to address and resolve issues as brought forward in this letter. The DFG believes that, fundamentally, the Specific Plan proposes the retention of areas onsite that will provide negligible habitat value through time and relies, in principle only, upon conservation of lands offsite to mitigate project impacts to wildlife at locations not specified and therefore at locations whereby the DFG is unable to evaluate the integrity of project mitigation.

Q

Thank you for the opportunity to review this project. If we can be of further assistance, please contact Jeff Finn, Staff Environmental Scientist at (530) 477-0308, or Kent Smith, Acting Assistant Regional Manager at (916) 358-2382.

Sincerely,



Sandra Morey
Regional Manager

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LETTER 27 SANDRA MOREY, DEPARTMENT OF FISH AND GAME

Response 27A: Commenter provides background and notes that CDFG is acting as both a responsible and trustee agency. Commenter also reports that CDFG finds the impacts to resources within its jurisdiction from the Specific Plan and Blueprint Alternative to be similar in nature. Comments noted. The County is unclear from where the “20,000 acres” calculation is derived. The *Placer County Natural Resources Report* (2004) reports the amount of remaining grassland to be 56,693 acres. Although direct impacts may be similar in the case of both plans, the Blueprint Alternative could have positive indirect benefits by concentrating development on a smaller footprint, thus reducing conversion of open space lands containing resources within CDFG’s jurisdiction.

Response 27B: Commenter believes that the Revised Draft EIR references to the Placer County Conservation Plan (PCCP) are inappropriate and speculative. The County believes that Revised Draft EIR references to the PCCP are appropriate. The Placer Vineyards project is identified as an “interim project” under the September 10, 2001 Natural Community Conservation Planning Agreement between the County, the CDFG, the U.S. Fish and Wildlife Service and NOAA Fisheries. The 2001 Planning Agreement requires that all projects designed during the development of the PCCP must be consistent with the principles and objectives of the conservation process and must not compromise the successful development or implementation of the PCCP. As a result, the Revised Draft EIR necessarily describes mitigation measures and their relationship to the PCCP effort as required by the Planning Agreement. References in the Revised Draft EIR to the PCCP process do not “defer” mitigation to subsequent, undefined action. In fact, the Revised Draft EIR recognizes that the PCCP process is underway and that requirements under the PCCP are not certain at this time. Because of this, the County’s Revised Draft EIR provides mitigation measures that are specific and capable of being implemented independent of the PCCP. Mitigation measures may specify performance standards which may be accomplished in more than one specified way (CEQA Guidelines Section 15126.4, subd. (a)(1)(B)). While the PCCP effort is not complete, many of the conservation measures likely to find their way into the PCCP have been identified by the County and are consistent with sound and accepted conservation strategies. Those generally accepted conservation goals provide a basis for Revised Draft EIR mitigation measures and the developing PCCP.

Response 27C: Commenter objects to the focus of the Revised Draft EIR on listed and sensitive species, rather than the broader array of resources. The County disagrees with this comment. The Revised Draft EIR does address the abundance and diversity of habitat and wildlife in the region, in addition to listed and sensitive species. Pages 4.4-4 through 4.47 identify the habitat types found in the Plan Area, and list those plant and animal species observed in those habitats. Many of these species are common, so that they are not listed or considered sensitive. The first impact in Section 4.4, Biological Resources, addresses the loss of open space. As discussed in Impact 4.4-1 on page 4.4-95, “Special-status species and more common wildlife and plant species are found throughout project area open space.” The following discussion of wildlife movement and fragmentation focuses on wildlife generally, not special-status species specifically. Mitigation Measure 4.4-1a requires preservation of open space at a 1:1 ratio with the amount of acreage lost under the proposed project, regardless of whether the acreage lost to

development supports special-status species. Impact 4.4-59 addresses the cumulative loss of open space, and the habitat it provides for special-status and other wildlife.

The remaining terrestrial biological resource impacts in the Revised Draft EIR do focus on special-status species and appropriately so given their relative scarcity compared with other species. As stated on page 4.4-10, special-status species have been afforded special recognition by federal, State and/or local agencies or organizations, and are of relatively limited distribution and could require specialized habitat conditions. Therefore, the loss of habitat for a particular special-status species could be substantially adverse. Reductions in habitat, if severe, could cause the species to drop below self-sustaining levels or reduce the number or range of the species. In contrast, common wildlife species are typically distributed widely enough that the loss of habitat from a single or even several development projects would not likely affect the existence of the species or its range. Of course, multiple projects over a wide area could affect common species, as reflected in Impact 4.4-59.

The Specific Plan Area is situated within the Pacific Flyway, one of four major migratory bird flyways in the United States. The Pacific Flyway encompasses Alaska, western Canada, the western United States, and Mexico (see Final EIR Figure 6). As such, all of the offsite mitigation areas are similarly situated within the Pacific Flyway and provide valuable and diverse habitat for migratory birds. The Placer Vineyards Specific Plan Area contains an estimated 2,152 acres of Important Concentration Area Grassland Pasture but no Important Concentration Area-Flooded Agriculture as identified in *Important Migrant and Wintering Bird Concentration Areas of Western Placer County* (Jones & Stokes 2003). The Plan Area supports limited habitat for water birds, which includes stock ponds, drainageways, and ephemeral features such as vernal pools. During aquatic invertebrate (wet season 2005-2006) surveys conducted within the Specific Plan, no concentrations of waterfowl or other waterbirds were observed.

The proposed mitigation areas collectively contain an estimated 1,866 acres of Important Concentration Area-Grassland Pasture and an additional 246 acres of Important Concentration Area-Flooded Agriculture. According to JSA 2003, the Important Concentration Area-Flooded Agriculture land cover type is used by water birds, shore birds, and waders. According to these data, the mitigation areas should support a greater diversity and richness of water birds than the Specific Plan area.

The Plan Area supports potential habitat for winter migrant raptors. Similar potential foraging habitat for winter migrant raptors is abundant throughout western Placer County. Special status non-raptor migrants area addressed in the Partially Recirculated Revised Draft EIR, which was available for public review between August 1 and September 14, 2006. Specifically, Impact 4.4-7 acknowledges that numerous non-raptor special status bird species, including tricolored blackbird and blackrail could nest and forage in the Specific Plan area. Mitigation is provided (Mitigation Measure 4.4-7) to reduce any potentially significant effects to a less than significant level.

Response 27D: Commenter takes exception to the statement that the project would only result in the loss of 3,250 acres of habitat. The Revised Draft EIR correctly concludes that the

development will result in the direct loss of 3,520 acres of habitat. Avoided areas will ultimately be surrounded by developed areas, but will still retain habitat value to wildlife.

The Revised Draft EIR does address the loss of a large land tract. Some of the primary proposed mitigation areas were chosen specifically for the purposes of contributing to the formation of larger preserve blocks of land in western Placer County. These areas support a diverse suite of resources, including those used by migratory waterfowl, winter migrant raptors, and other wildlife species. Keystone properties such as Redwing and Antonio Mountain Ranch connect directly with other mitigation lands, increasing the value of the overall preserved blocks through increased connectivity and habitat diversity.

Response 27E: Commenter believes that the Revised Draft EIR overstates the value of 714 acres of open space lands retained onsite. The Revised Draft EIR does not make assignments of value, but rather identifies potential project impacts and corresponding mitigation measures which are consistent with regulatory policy. The commenter overlooks the fact that onsite open space can be used for habitat enhancement and restoration, thus enhancing values for wildlife.

The Revised Draft EIR acknowledges that potential indirect impacts to riparian corridors could negatively affect species even though riparian vegetation is not directly impacted. Project setbacks, which are consistent with the Placer County General Plan, are intended to mitigate impacts to a less than significant level (Revised Draft EIR page 4.4-112). Further, commenter appears to be suggesting that the project is fragmenting riparian habitat. In fact little fragmentation of riparian habitat will occur as a result of project implementation. Most riparian habitat is found along the Dry Creek corridor, which will be buffered and left essentially untouched by the project: “Buildout of the Specific Plan development footprint avoids impacts to Dry Creek riparian habitat by adjacent land use, and is consistent with the 100-foot setback from perennial streams (Curry Creek) required by the General Plan. In most places along the stream corridor, the setback is considerably wider” (Revised Draft EIR page 4.4-112). It is also erroneous to suggest that riparian areas will simply become drainage areas. The Master Project Drainage Study proposes a series of parallel off-stream channels to avoid degradation and destruction of riparian and wildlife habitat (see Revised Draft EIR Figure 4.3-5, Swale to Remain).

The other riparian areas mapped within the Specific Plan area include scattered Goodding’s black willow trees along an intermittent drainage west of Palladay Road, and an isolated patch of riparian scrub (i.e., blackberry bramble dominant) in the northeastern portion of the Plan area. The black willows are distributed along the drainage such that the scattered trees are rooted within or on the bank but do not form a corridor of vegetation into the adjacent uplands. These on-site riparian areas are highly fragmented and likely provide diminished wildlife value due to the relatively small area which they encompass and the close proximity to Palladay Road and rural residences. Nevertheless, these areas are proposed for avoidance, and the Operations and Management Plan, which will be required as part of the Section 404 permitting process, will detail measures to protect these other riparian resources.

The comments provided by CDFG cite fundamental ecological principals pertaining to fragmentation and include a mathematical equation that describes the general relationship

between species number and area. There are, of course, other contributing factors, besides gross area, that influence species diversity at any given location. Numerous variables including habitat diversity, habitat quality, and landscape context all contribute to species diversity. Also see Response to Comments 27D and 27L.

Response 27F: Commenter discusses the relationship between habitat size and extinction risk. The County acknowledges the importance of these ecological principals. Proposed offsite mitigation areas, such as Redwing and Antonio Mountain Ranch were chosen specifically for the purposes of contributing to the formation of larger preserve blocks of land in western Placer County. These keystone properties connect directly with other mitigation lands, forming two very large preserve blocks (5,810 and 1,695 gross acres), increasing the value of these areas, through increased connectivity and habitat complexity. The preservation of larger blocks reduces fragmentation.

The retained riparian systems will be subject to a long-term management plan that will detail various required components such as fencing provisions, habitat monitoring efforts, thatch management, erosion control, and invasive weed management. The commenter does not indicate where in the Revised Draft EIR reference is made to "...riparian systems that are designed...principally as drainage areas." As noted in Response to Comment 27E, the applicants are going to considerable lengths to avoid using riparian streams and channels as "drainage areas."

Response 27G: Commenter believes that the Revised Draft EIR understates the loss of habitat. Comment noted. The County disagrees with this conclusion. The development will result in the direct loss of 3,520 acres of habitat. In this case, the impact area is not a preserve area, actively managed for ecological value, but is actually an assemblage of agricultural and some rural residential properties with associated agricultural use, some of which (e.g., active cultivation) are not necessarily favorable to habitat values. Avoided areas will ultimately be surrounded by developed areas, but will still retain habitat value to wildlife and could be used for habitat enhancement and restoration.

Response 27H: Commenter believes that the EIR has underestimated mitigation requirements due to underestimating impacts or overestimating the value of applicant-proposed mitigation. These issues have been more specifically addressed in Responses to Comments 15I, 27D, 27E, 27F, and 27G.

Commenter also apparently disagrees with the statement that "it would not be feasible to create 3,520 acres of new open space to offset development of the Specific Plan area." Given that the creation of "new" open space can only be accomplished by converting already-developed lands back to open space use, such a mitigation strategy is infeasible.

Commenter takes exception to the required and stated 1:1 open space mitigation ratio, indicating that this or other ratios specified in the Revised Draft EIR aren't based upon "any reasoned analysis", and to the application of other State and federal resource agency mitigation requirements to this 1:1 ratio. Regarding potential or proposed mitigation properties, the applicants have made a good-faith effort to identify and target for acquisition specific off-site

mitigation areas precisely so that their conservation/mitigation value could be assessed by the resource agencies. While a 1:1 ratio has been used to provide some framework for targeting appropriate mitigation properties (and to provide some assurance that required mitigation will exceed some minimum level), it is anticipated that County approval of mitigation properties (as stipulated in Mitigation Measure 4.4-1 will consider the intrinsic values of real mitigation properties in the real-world landscape. It is thus possible, that approved mitigation properties may yield mitigation ratios greater than 1:1, in the sense that, in meeting the County's 1:1 open space requirement and other additional requirements for specific resources at the same time, the County may find that a single acre of property does not simultaneously satisfy both open space and all resource mitigation needs.

Commenter acknowledges the desirability of connecting mitigation areas, but denigrates the strategy of interconnecting "small" parcels as opposed to establishing larger preserve areas. While the County acknowledges the validity of the general ecological principle underlying this comment, the application of general ecological principles to specific landscapes should be tempered by a recognition of the complexities involved. For example, commenter fails to acknowledge that increased habitat values (e.g., diversity) on so-called "smaller" parcels may actually render them more desirable and effective mitigation than larger parcels (e.g., monocultures). In addition, parcel lines generally do not conform to the distribution of ecological values, but they generally do constrain the acquisition of mitigation properties. Further, the acquisition of mitigation properties is subject to other market realities, such as availability (i.e., willing seller) and affordability at the time of acquisition. All things being equal (including intrinsic habitat value), generally, larger preserves are more effective. However, it does not necessarily follow that smaller, connected preserve areas are less valuable, particularly in the case of "keystone" properties where they provide contiguity to other mitigation properties such as Antonio Mountain Ranch and Redwing.

Response 27I: Commenter states that the following Revised Draft EIR statements are factually incorrect and misleading: Page 4.4-90, sentence 1, page 4.4-91 paragraph 1, and page 4.4-91, paragraph 3. The statements as appear in the "Mitigation Strategy Section," which is a narrative describing the County's efforts and intent to establish a feasible mitigation program to satisfy the myriad federal, state, and local statutes, regulations, and policies affecting open space, agricultural lands, and biological resources. These general statements of intent are background and are not to be confused with proposed mitigation measures beginning on page 4.4-95 of the Revised Draft EIR. The commenter appears to be expressing an opinion on behalf of CDFG. The comment is noted. The County's opinion and efforts related to this matter are relevant to an understanding of the context in which project mitigation is proposed. Therefore, the County elects to retain the information in the Revised Draft EIR.

Response 27J: Commenter questions the application of predetermined, generalized mitigation ratios to potential but unsecured mitigation properties and claims inability to judge the efficacy of proposed mitigation. Generalized mitigation ratios have been used for many years by most of the State and federal resource regulation agencies to prescribe mitigation requirements for proposed projects. For example, CDFG routinely relies upon predetermined or programmatic mitigation ratios published in mitigation policy documents to judge the efficacy of mitigation for Swainson's hawks, burrowing owls, and giant garter snakes. The U.S. Fish and Wildlife Service

routinely relies upon predetermined mitigation ratios to ensure appropriate mitigation for vernal pool branchiopods, Valley elderberry longhorn beetle, and giant garter snakes. The U.S. Army Corps of Engineers routinely pursues a “no net loss” policy by allowing for 1:1 mitigation (i.e., creation) where functioning mitigation acreage is already established at a mitigation bank. The use of formulaic mitigation ratios is a well-established practice, and actually provides for more (rather than less) certainty that impacts are being appropriately mitigated. See Response to Comment 15I for a discussion of judicial approbation of a .5:1 mitigation ratio employed in the nearby Natomas Basin.

Regarding potential or proposed mitigation properties, the applicants have made a good-faith effort to identify and target for acquisition specific off-site mitigation areas precisely so that their conservation/mitigation value could be assessed by the resource agencies. It is infeasible for applicants to secure easements or title to properties prior to certification of the EIR and the securing of project entitlements. Securing title to such properties (as opposed to options) prior to project approval would require significant expenditures made without the certainty of a viable development project, which can only result from local agency approval of entitlements.

Response 27K: Commenter is concerned that the deferral of long-term management monitoring, and adaptive management strategies does not allow for an understanding of the values potentially achieved on mitigation lands. In preparing Mitigation Measure 4.4-1a and selecting the mitigation lands under the Applicant Initiated Mitigation Proposal, the applicant considered the following factors in determining the conservation value for proposed vernal pool/grassland areas.

Area Quality

As discussed on page 4.4-93 of the Revised Draft EIR, in its review of the Applicant Initiated Mitigation Proposal, the Revised Draft EIR considered factors such as the acreage associated with the existing vernal pool complex habitat and the potential acreage opportunities for restoration and creation of vernal pool habitat on the six mitigation sites proposed for acquisition. A comparison of area quality should also include a consideration of existing and future land use. In this case, the impact area is not a preserve area, actively managed for ecological value, but is actually an assemblage of agricultural and some rural residential properties with associated agricultural use, some of which (e.g., active cultivation) are not necessarily favorable to habitat values. Further, the impact area is surrounded on all sides by existing or proposed development.

Based on available information, the Revised Draft EIR assumes that approximately 5% to 10% of the total property area of a given mitigation site would provide restoration and creation potential at four of the six mitigation sites. Restoration and creation potential at Antonio Mountain Ranch and Redwing was based on conceptual level planning conducted at these sites. Calculation of the number of pools lost/gained on a mitigation site will be determined through the Open Space Mitigation and Monitoring Plan prepared for each mitigation site. Thus, area quality was an important criterion considered both in Mitigation Measure 4.4-1a and the Applicant Initiated Mitigation Proposal.

Area Shape

Commenter states that long narrow patches have more edge per area and thus less conservation value than square patches. CDFG suggests that the area/perimeter ratios of the proposed development and the mitigation lands should be equal.

Given equal contained areas, the smaller perimeter of a square parcel, as opposed to a rectangular parcel, may minimize edge effects. While the calculated area:perimeter ratios for each of the potential mitigation sites are lower than the Placer Vineyards Specific Plan impact area, this is a function of size more than shape (easily illustrated by calculating the area:perimeter ratios of two perfect squares of unequal size). The fact that one would have to imaginarily lump all of the mitigation areas into a single combined shape in the same place on the landscape in order to achieve a hypothetical “apples-to-apples” comparison of Placer Vineyards’ impact area to the proposed mitigation areas illustrates the irrelevance of using this calculus as a hard and fast rule. All things being equal, a higher area perimeter ratio may be preferable, but the composite value of an individual mitigation property involves consideration of several other variables.

In this case, that consideration is also complicated by the fact that the impact area is not a preserve area, actively managed for ecological value, but is actually agricultural and rural residential properties with associated agricultural use, some of which (e.g., active cultivation) are not necessarily favorable to habitat values. Further, as discussed under 27H, parcel lines rarely conform conveniently to the distribution of ecological values, but parcel lines do constrain the acquisition of properties. Finally, the strictly mathematical calculation of area:perimeter ratio ignores the added functional value of “keystone” properties such as Antonio Mountain Ranch and Redwing, which effectively enlarge existing preserve areas.

Mitigation Measure 4.4-1a requires that to address the fragmentation of open space and to minimize edge effects, the applicant shall establish a core preserve area of approximately 1,000 acres or minimum 200-acre areas will be added to an existing preserve that is at least 1,000 acres. Under the Applicant Initiated Mitigation Proposal, Musolino and Vogt are adjacent, several of the proposed mitigation sites (i.e., Redwing, Antonio Mountain Ranch, and Lincoln Ranch) include highly valuable existing habitat, and two (i.e., Antonio Mountain Ranch and Redwing) are adjacent to large expanses of property already committed to permanent preservation.

Internal Fragmentation

As stated in Mitigation Measure 4.4-1a, one acre of open space will be preserved for each acre of open space impacted. To address the fragmentation of open space in the Specific Plan area, the applicant is required to establish a core preserve area of approximately 1,000 acres, or minimum 200-acre areas will be added to an existing preserve that is at least 1,000 acres. With the exception of Placer 312, mitigation lands that are proposed as part of the Applicant Initiated Mitigation Proposal tend to minimize the assemblage of long rectangular parcels. These properties demonstrate the presence of natural vegetation with limited disturbance. Thus,

avoiding internal fragmentation was an important criterion considered both in Mitigation Measure 4.4-1a and the Applicant Initiated Mitigation Proposal.

Matrix Permeability

As indicated in the Revised Draft EIR on page 4.4-91, although none of the mitigation land is connected to another, three of the mitigation sites have highly valuable existing habitat and others support grasslands or are capable of habitat restoration, and all of the mitigation lands are located in areas which the County has designated for open space/agricultural land uses (see Final EIR Figure 7). Some of the mitigation sites also are located adjacent to other preserve areas to maximize dispersal habitat and minimize the potential for intervening land uses to act as obstacles to wildlife movement. Thus, matrix permeability was considered both in Mitigation Measure 4.4-1a and the Applicant Initiated Mitigation Proposal.

Ability to Manage Preserve Areas

As indicated in the Revised Draft EIR on page 4.4-91, although none of the proposed mitigation land is connected to another, three of the mitigation sites have highly valuable existing habitat and others support grasslands or are capable of habitat restoration, and all of the mitigation lands are located in areas which the County has designated for open space/agricultural land uses. As noted above, some of the sites are included in a band of property already committed to preserves. Further, the Revised Draft EIR states that the County would consider mitigation lands suitable to the extent such sites are identified for conservation or mitigation in the PCCP. Thus, the ability to manage the preserves and minimize land use conflicts were important criteria considered both in Mitigation Measure 4.4-1a and the Applicant Initiated Mitigation Proposal.

Response 27L: Commenter recommends off-site mitigation for riparian habitat impacts. Along Dry Creek a substantial and established riparian corridor includes oak, willow, cottonwood and alders. Within this corridor, avoidance and open space will protect the riparian resources there. Excluding this area, other riparian habitat within the Specific Plan area is significantly degraded by historic agricultural operations and land use and is extremely limited. Most of the areas capable of supporting riparian communities have been intensively farmed or indirectly disturbed by adjacent land uses. As a result, minimal riparian habitat exists over most of the Plan Area. Riparian canopy is minimal and intermittent. Proposed on-site open space areas are adequately sized and will be specifically planned to support and protect riparian restoration and mitigation plantings required under the Revised Draft EIR mitigation measures (see Response to Comments 27D and 27E). Additionally, the Revised Draft EIR provides that any riparian mitigation will occur in coordination with CDFG as part of Cal. Fish and Game Code Section 1602 et. seq. The Revised Draft EIR specifies measures that minimize the removal of significant riparian habitat. For example, all stream crossings shall be performed using “jack and bore” construction techniques, unless otherwise specified by CDFG. For unavoidable impacts, the Revised Draft EIR requires that replacement ratios exceed 1:1 in order to ensure that new riparian habitat equals or exceeds the value of the lost habitat over the long-term.

Response 27M: Commenter wishes to delete references to the PCCP. See Response to Comment 27B. In addition, CEQA Guidelines Section 15125 requires that an EIR discuss any

inconsistencies between the proposed project and applicable regional plans. Such regional plans include, but are not limited to applicable habitat conservation plans and natural community conservation plans (NCCP). Appendix G to the CEQA Guidelines also requires that the County determine if the project would conflict with the provisions of an adopted habitat conservation plan, NCCP, or other approved local, regional, or state habitat conservation plan. Although case law does not require lead agencies to consider draft habitat conservation plans (see *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145-1146), nothing *prohibits* the consideration of such plans, particularly under circumstances such as those present here, in which the County has entered into a Planning Agreement with regulatory agencies requiring the County to be cognizant of the potential for Interim Projects to undermine the future PCCP.

The County initiated preparation of the Revised Draft EIR following release of a draft of the PCCP. While it is recognized that the PCCP effort is a lengthy process involving many agencies, stakeholders and the public and the timeframe for PCCP adoption is unknown, the County considered the PCCP in the evaluation of impacts and potential mitigation measures because the PCCP is expected to be adopted by the County as a future HCP/NCCP. Because an agency review-administrative draft PCCP was under preparation and released to the state and federal agencies prior to the release of the Revised Draft EIR for the Placer Vineyards Specific Plan, the County also considered the PCCP as a reasonably foreseeable project.

It is understood that the Department, the U.S. Fish and Wildlife Service and other interested agencies are continuing to review and comment on the PCCP. Nonetheless, deletion of all PCCP references and elimination of any provisions pertaining to the PCCP would be contrary to the terms of the Planning Agreement described in the Response to Comment 27B. Also, as described in Response to Comment 27B, the Revised Draft EIR provides mitigation measures that are specific and capable of being implemented without the PCCP. Mitigation measures may specify performance standards which may be accomplished in more than one specified way (CEQA Guidelines Section 15126.4, subd. (a)(1)(B)).

Response 27N: Commenter recommends that all lands be obtained in fee and that easements not be considered. The commenter provides no basis for the expressed preference for fee acquisition of mitigation lands. This appears to be at odds with prior County and State actions and would greatly hinder landowners' ability to acquire mitigation sites. Since this is a matter of policy, and not germane to an environmental impact, no further response is required.

Response 27O: Commenter concludes that a minimum of 4,251 acres would be required to mitigate project impacts. See Response to Comments 27D, 27E, 27F, and 27G. The County does not disagree with the commenter where it is stated generally that acreage to be preserved is dependent on the size of the area conserved and the integrity of the resources within the proposed mitigation areas. Although the County's proposed CEQA mitigation sets forth specific ratios that must be satisfied, the actual acreages required offsite for preservation will be a function of how the general land uses and configurations shown in the Specific Plan translate into specific development and open space proposals as individual projects are processed at the tentative map or use permit level of planning. Although the mitigation ratios set forth in Mitigation Measure 4.4-1 need not be exceeded in order to satisfy CEQA, as a practical matter a higher level of mitigation might be achieved due to the difficulty of finding parcels offsite of the precise

acres required to meet the exact ratios set forth in the Measure. It is entirely possible too that greater amounts of on-site avoidance will occur than are currently anticipated. Proposed Mitigation Measure 4.4-1 provides that a variety of resource values must be met. Where those values cannot be met within proposed mitigation sites, additional sites must be obtained.

Response 27P: Commenter wants alternatives considered that would retain large areas of existing vernal pool grassland onsite and suggests that the Revised Draft EIR does not address this option. The commenter is referred to Section 6.3.2 of the Revised Draft EIR where the Reduced Density Alternative is discussed. The first paragraph under Section 6.3.2 reads in part: “The Reduced Density Alternative is intended to conserve natural resources and open space to a greater extent than the proposed project. In addition to larger lot sizes, open space is increased by 82%, from 714 acres to 1,310 acres, with much of the increase coming from the expansion of currently proposed open space areas (see Figure 3-12 for comparison).” To further identify potential conservation benefits of the Reduced Density Alternative, the County has prepared an additional figure, Final EIR Figure 8, that overlay wetlands and other waterway features on the Reduced Density Alternative. The legend accompanying Figure 8 identifies that 53.36 acres of vernal pool complex would be affected by the Reduced Density Alternative. As shown on Revised Draft EIR Table 4.4-12 below, the comparable impact under the proposed project would be approximately 69 acres. Therefore, it is not accurate to state that the County has not “...addressed any alternative design scenario that includes retention...”

Revised Table 4.4-12 Aquatic Resource Impact Estimates						
Habitat	Direct Impacts (on-site) (acres)	Direct Impacts (off-site)	Indirect Impacts (on-site) (acres)	Indirect Impacts (off-site) (acres)	Preservation¹ (acres)	Creation/Restoration² (acres)
Vernal Pool Complex Habitat	69	5	19	3	192	74
Other Wetlands/Waters	27	2	0	N/A	0	29
Total	96	7	19	N/A	192	103
Notes: ¹ 2:1 for direct and indirect impacts to Vernal Pool Complex Habitat. ² 1:1 for direct impacts to other wetlands/waters. Additional restoration may be used in lieu of Preservation in circumstances deemed N/A means no indirect effects to non-fairy shrimp habitat type wetlands have been estimated Source: ECORP Consulting, 2006						

In further response to CDFG concerns, the County has also examined an 85% retention alternative. This is graphically described on Final EIR Figure 9. The blue “bubbles” represent all identified vernal pool complexes and a 250-foot buffer. Taken as a whole, approximately 2,182 acres would be affected. Assuming that 15% of the affected area could be mitigated offsite, approximately 327 acres of the vernal pool complex/buffer area could be disturbed. To illustrate how this might occur, a contiguous area that allows retention of 85% of the affected vernal pool resource has been identified and is shaded on Figure 9. The area is generally near the center of the property and would receive access from Baseline Road. It would sever the project area, but was selected because it appeared to have the lower occurrence of vernal pools. A smaller area that has a low occurrence occurs within the SPA at the west end of the project area; however, this lower occurrence is related to the fact that this area is already partially

developed with rural residential uses. In addition, this area is not under the control of the proponents for the Specific Plan. To the east, in the vicinity of Watt Avenue and Dry Creek, there is also an area that is relatively free of vernal pool occurrences; however, its smaller size and irregular shape make stand-alone development problematic.

The shaded area contains approximately 1,300 acres with approximately 327 acres affected by vernal pool features. A significant vernal pool complex, located in the southwestern corner of the shaded area, is included within the 1,300 acres. This area was included to approximate the 85/15 ratio while maintaining a relatively regular boundary and appeared preferable to encroachments to the east or west. Other configurations are, of course, possible and the chosen configuration is strictly illustrative. Other configurations would, however, likely be more irregular and would increase the perimeter of the development area. In addition, the concentration of vernal pools at the southwestern corner of the proposed development area is bordered along its southern boundary by the Elverta Specific Plan. The proposed 1,300-acre area (as configured) would allow a contiguous development area to be created with the Elverta Specific Plan.

The area allocated to development under this alternative would approximate 25% of the proposed project, or approximately 3,500 dwelling units accommodating a population of approximately 8,700 persons. If SACOG Blueprint Plan principles were applied, population could approximate 13,000 persons; however, the “leap frog” nature of the development area surrounded by vernal pool preserves would be contrary to Blueprint Plan principles and other traditional planning principles which encourage compact and contiguous growth. Public infrastructure and services would require extension to serve the projected population, and per unit cost would increase significantly due to the need to extend services and infrastructure through preserve areas that would not receive development entitlements.

Based upon the distribution of vernal pools shown on Final EIR Figure 9, it can be readily seen that most project objectives could not be achieved under a plan that retains 85 % of vernal pools. If development potential were stretched beyond the shaded area shown on Final EIR Figure 9, such development would be very discontinuous and leap frog in nature, and its feasibility from a financial and market perspective highly suspect. Further scattered development within an area that would be predominantly vernal pool preserve would pose a number of access problems and potential land use conflicts that would undoubtedly lead to vernal pool encroachments and degradation over time. Because most project objectives could not be achieved where 85% of vernal pools are protected and for the additional reasons set forth above, the County dismissed this alternative as unreasonable and lacking real-world feasibility.

It should also be noted that the Placer County General Plan has shown all of the Specific Plan area for development since 1994, including the construction of 14,132 dwelling units and related retail and employment uses. It is highly unlikely that a design proposal that preserved 85 % of vernal pools could be found to be consistent with the Placer County General Plan. In addition, as shown on Revised Draft EIR Figure 4.1-7, SACOG considered and assumed development of the Placer Vineyards Specific Plan area due to its proximity to existing employment uses and contiguity to the urban region. Less development on the Placer Vineyards Specific Plan site, per CDFG suggestions, would ultimately push the urban area development perimeter further into

open space and existing habitat areas setting the stage for greater conflict and loss while exacerbating other environmental concerns, such as traffic congestion and air pollution. The commenter is referred to the discussion of Impact 4.1-8, beginning on Revised Draft EIR page 4.1-57, and Section 6.3.4, beginning on page 6-38 of the Revised Draft EIR, for additional discussion of the benefits of compact development.

Response 27Q: Commenter summarizes objections to the project and recommends that the Revised Draft EIR be revised. Comment noted. See Responses to Comments 27A through 27P. The EIR was revised and partially recirculated from August 1 to September 14, 2006 to address concerns related to non-raptor migratory bird species. The County disagrees with the commenter's remaining characterizations of the Revised Draft EIR and project. The commenter states that offsite mitigation lands are not specified. This mischaracterizes the EIR and the County's intent (see Table 4.4-8 and Figure 4.4-7 of the Revised Draft EIR).

May 19, 2006



County of Placer
Attn.: Lori Lawrence
Environmental Coordination
11414 B Avenue
Auburn, CA 95603
Fax: 530/886-3003

**RE: Placer Vineyards Specific Plan, Revised DEIR, PEIR-T200540651
PG&E Comments**

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the Placer Vineyards Specific Plan, Revised DEIR. I am writing to provide you with additional information concerning the impacts of the Placer Vineyards Specific Plan (the "Plan") on public utility services in the area. As you know, the California Environmental Quality Act ("CEQA") requires the County, as lead agency, to evaluate the "whole of the action," including the potential environmental impacts of any reasonably anticipated future projects. See, e.g., CEQA Guidelines, sections 15378(a), 15130.) As the County's EIR for the Plan acknowledges, approval of the Plan will result in the need for PG&E to construct new gas transmission facilities to serve the Placer Vineyards development. Further detail concerning the necessary PG&E upgrades has become available since the publication of the EIR. Therefore, to assist the County in its efforts to comply with CEQA, PG&E hereby provides additional details concerning the facilities PG&E will need to construct in connection with the Placer Vineyards development, as well as their potential environmental effects. For the reasons discussed below, construction of the PG&E facilities necessary to serve the Placer Vineyards development will not result in any significant unmitigable environmental impacts. PG&E respectfully requests that the information provided herein be included in the County's Revised EIR and added to the administrative record in support of the County's approval of the Placer Vineyards Specific Plan.

A

Electrical Facilities

1. There is a typo in the last sentence of the last paragraph under the heading "PROPOSED SUBSTATION" of Section 4.11.10 on page 4.11-111. The approximate setback distance from the proposed substation fence to the edge of county road right-of-way is typically twenty (20) feet, not 120 feet. Please replace the number 120 with the number 20.
2. Per Section 4.11.10-2 on pages 4.11-116 and 117, while we feel the mitigation measures to the utility infrastructure access issues are appropriate, PG&E will

B

C

need to be involved in the planning of the access provisions to ensure any special requirements are met. For instance, each existing tower location must be accessible by large utility trucks and or cranes. These vehicles have a large turning radius and include outriggers for stability. A minimum of forty (40) feet of clear working space around each tower is required.

C cont.

Natural Gas Facilities

The current description of natural gas facilities in the DEIR needs to be updated. PG&E will need to install the following natural gas facilities:

Transmission pipeline: PG&E will extend a 24-inch-diameter gas transmission pipeline from the terminus of the existing Line 123 on the northwest corner of Fiddymont and Baseline Road. The pipeline will extend down Baseline Road to South Brewer Road (approximately 5.0 miles). PG&E will install the pipeline on the south side of the road. Construction of the pipeline will generally require a 100-foot wide construction right-of-way. The construction right-of-way may be narrowed to avoid occasional environmental impacts, however, additional workspace may be needed at select locations for stream crossings, road crossings, and in other areas where special construction methods are required. A 50 foot permanent right-of-way is required for operation and maintenance of the pipeline.

Pressure regulation stations: PG&E will construct three pressure regulation stations. One Pressure Limiting Station (PLS) is required to assure the proper pressures are maintained in the transmission system and two stations are required to reduce the pressure of the gas before delivering it to the distribution pipeline system. The pressure regulation stations will be installed in fenced yards above ground. The PLS station will cover an area of approximately 35 feet by 75 feet. The regulation stations will require two separate fenced yards covering an area of approximately 25 feet by 40 feet each. Slat fencing will be used to screen equipment from view and the facilities will use night lighting only in case of emergencies. PG&E will construct the PLS station and Regulation Station #1 at the intersection of Baseline Road and Watt Avenue, and Regulation Station #2 at the intersection of Baseline Road and South Brewer/Dyer Lane.

D

Distribution pipeline: PG&E will install an 8-inch-diameter gas distribution line through the Placer Vineyards Specific Plan area. The line will extend south along Watt Avenue from Regulation Station #1, then head west along Dyer Lane, and north along Dyer Lane/South Brewer Rd to Regulation Station #2. PG&E will install the distribution pipeline within a public utility easement (PUE) concurrent with the development of the subdivision.

Pipeline Construction Methods

The natural gas pipeline will be designed per all applicable federal, state and local regulations and ordinances—most notably, Department of Transportation (DOT) Code

of Federal Regulation (CFR) 49 part 192. A specification will be prepared to guide the contractor in the installation of the pipeline and provide quality assurance measures for inspections. All aspects of construction, commissioning, and acceptance testing will be inspected by professional pipeline inspectors.

Clearing and grading operations involve preparation of the ROW, including vegetation removal, debris disposal, and land leveling. Limited grading is anticipated because of the level topography in the area. Where necessary, erosion controls would be installed immediately following initial disturbance of the soils and maintained throughout construction to contain excavated material within the approved temporary use areas, using methods from PG&E's *Water Quality Construction Best Management Practices Manual*.

Trenching will be accomplished with either a bucket-wheel ditching machine or conventional track-mounted excavators. Stringing operations involve trucking lengths of pipe (joints) to the ROW and positioning the pipe along the ROW, parallel to the centerline of the trench. Temporary gaps in the strung pipe will be maintained for access, as needed.

Pipe installation operations involve bending, welding, joint coating, and lowering-in of the pipe. The pipe joints will be welded together as a continuous pipeline next to the trench. Each weld will be visually inspected and radiography tested. Prior to lowering in, the pipe coating will be electronically tested to confirm the coating is intact and repaired as necessary. The excavated trench bottom will be filled with select material to provide bedding for the pipe. Sideboom tractors will be used to lower the pipe into the trench. Inspections will be made to ensure that the trench is deep enough, the bottom is free of damaging debris, the pipe is properly placed, all bends conform to the trench, and the external coating is not damaged.

D cont.

Trench barriers or breakers would be installed before backfilling at specified intervals to prevent water movement along the pipeline. The trench will be backfilled using the material originally excavated from the trench. In rocky areas, a padding machine will be used to sift the fines from the trench spoil windrow. In locations where the originally excavated material is not suitable, granular backfill material from approved borrow sites may be required. Backfill material will be compacted and bermed over the ditch centerline to compensate for settling. All disturbed sites will be restored to original or future grade, with allowance for settling. The criteria for determining potential settling will be based on soil texture, coarse fragment content, and relative compaction.

The new pipeline will be strength tested by means of a hydrostatic test. The pipeline will be filled with water and pressurized to 1.5 times the operating pressure and held for a minimum of 8 hours. Test water intake and discharge will be performed in accordance with all regulations and permit requirements. Test water will be discharged at a rate or in a manner that minimizes erosion. The pipeline will be dried prior to being placed into service.

Once the pipeline is packed with gas to operating line pressure, the temporary use areas will be restored in accordance with pre-arranged landowner requirements. All construction material and debris would be removed and disposed of at appropriate landfills. All work areas would be graded and restored to pre-construction contours.

Road, Railroad, and Waterbody Crossing Procedures

Specific crossing methods have not been identified for all linear features that will be crossed by the project. Where permitted by local authorities, road crossings will be open cut and all open trenches will be plated to provide for vehicular traffic during non-working hours. Railroads and roadways that will not be open trenched will either be bored or horizontally directionally drilled (HDD). Boring will be accomplished by vibratory or auguring methods. Boring/drilling and receiving pits will be required at respective ends of the crossing to provide for equipment and/or receive the driven pipe. Where permitted, waterbody crossings will be open cut. Where open cutting is not permitted, PG&E will employ either dry crossing (flumed or dam and pump-around) or horizontal directional drilling (HDD) techniques.

E

Environmental Permits

The transmission pipeline construction activities will likely require the following environmental permits, either individually or together with the permits being obtained by Placer Vineyards:

- Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers (ACOE) for potential impacts to wetlands and other waters of the U.S.
- Endangered Species Act Section 7 consultation between the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries (NOAA Fisheries), and the ACOE, including preparation of a Biological Opinion to address potential take of federally listed species
- National Historic Preservation Act Section 106 Consultation between the State Historic Preservation Officer and the ACOE
- Section 2081 Incidental Take Permit from the California Department of Fish and Game (CDFG) for potential impacts to state-listed species
- Section 1602 Lake and Streambed Alteration Agreement with the CDFG for pipeline crossings of CDFG-jurisdictional waters
- General Construction Storm Water Permit from the State Water Resources Control Board, including preparation of a Storm Water Pollution Prevention Plan, as required
- Clean Water Act Section 401 Certification from the Regional Water Quality Control Board
- Low Threat Discharge permit from the Regional Water Quality Control Board for trench dewatering and discharge of hydrostatic test water

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As part of the permitting for the project, the following studies will be conducted to assess potential impacts:

- Wetland delineation
- Rare plant surveys
- Brachiopod surveys
- Valley elderberry longhorn beetle surveys
- Fish habitat assessment
- Burrowing owl surveys
- Raptor nest surveys

- Black rail surveys
- Herpetofauna surveys (California red-legged frog, western spadefoot toad, California tiger salamander, giant garter snake, western pond turtle)

F cont.

The permitting process will ensure that all potentially significant impacts are fully addressed and mitigated to the satisfaction of the permitting agencies.

Potential Environmental Impacts and Best Practices

PG&E implements standard environmental best practices during utility construction activities to minimize environmental impacts. Typical procedures that will be implemented include the following:

- Full compliance with all federal and state environmental laws and regulations
- Installation of appropriate best management practices for storm-water and non-storm-water discharges
- Storage, handling, and disposal of hazardous materials and hazardous wastes in full compliance with all laws and regulations
- Complete resource surveys for biological and cultural resources as required by the permitting agencies
- Provide biological monitors at specific locations or during certain construction activities as required by the permitting agencies
- Halting any construction activities that uncover buried cultural and paleontological materials until the discovery can be fully evaluated and treated to the satisfaction of the appropriate parties
- Restricting all construction activities to approved and permitted work areas
- Good housekeeping practices, including removal of litter and debris
- Traffic management in compliance with encroachment permits from the appropriate jurisdiction and/or approved Traffic Control Plan
- Fire prevention and control in compliance with State Fire Marshall, other responsible fire-fighting agencies, and/or approved Fire Prevention Plan
- Implementation of standard measures to reduce fugitive dust and construction emissions
- Conduct Worker Environmental Awareness program for construction workers
- Installation of protective fencing or flagging, as appropriate, around sensitive species populations or habitat
- Inspection of trenches and pits for entrapped wildlife and installation of escape ramps in excavated trenches where needed.
- Compliance with timing windows and restrictions as identified by state and federal wildlife resource agencies

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Other potential environmental impacts include aesthetics and noise.

- **Aesthetics:** The pipeline would result in less than significant permanent changes to the visual quality of the surrounding areas. The only permanent above-ground features would be eight-foot high pipeline paddle markers located along the pipeline route, the PLS and pressure regulation stations, other above ground appurtenances. Temporary visual impacts will be

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construction related consistent with the construction practices described above.

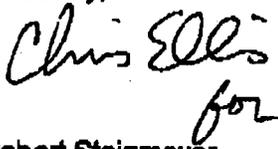
- **Noise:** The pipeline will result in less than significant noise impacts. The operation of the pipeline is not expected to result in permanent noise impacts. Temporary noise impacts during construction of the pipeline are expected to be consistent with the general construction activities that will occur in the surrounding areas. Observation of appropriate work hour restrictions near noise-sensitive receptors.

H cont.

Summary

PG&E is dedicated to providing safe and reliable electrical and natural gas service to meet the Placer Vineyards Specific Plan area's needs. In addition, I am available to review and comment on specific development details for the purpose of protecting these vital utility easements and facilities. If you have any questions regarding the above information or have additional questions please do not hesitate to contact me at 530/889-3131.

Sincerely,



for
Robert Steigmeyer
Land Agent
rlsz@pge.com

LETTER 28 ROBERT STEIGMEYER, PACIFIC GAS AND ELECTRIC COMPANY

Response 28A: Commenter requests that additional detail provided in the commenter's letter be included in the Revised Draft EIR and record. Comment acknowledged. Specific comments are addressed below.

Response 28B: Commenter notes that Revised Draft EIR contains a typographical error. Comment acknowledged. The last sentence of the last paragraph under the heading "PROPOSED SUBSTATION on page 4.11-111 of the Revised Draft EIR is hereby amended as follows:

The substation will be landscaped and set back approximately ~~420~~ 20 feet from the county road right-of-way (Michael Gunby, PG&E Senior Land Project Analyst, correspondence, November, 2004).

This change does not represent the addition of significant new information as defined in Section 15088.5(a) of the CEQA Guidelines.

Response 28C: Commenter states that PG&E wishes to be involved in the planning of access within infrastructure easements. Comment acknowledged. Mitigation Measure 4.11.10-2a is hereby amended as follows:

All locations and continuous maintenance access points for natural gas and electrical infrastructure shall be identified in consultation with PG&E and/or SMUD and are to be clearly marked or noted on tentative subdivision maps. Dedicated easements for utility maintenance equipment shall be recorded prior to or concurrent with acceptance and recordation of final maps.

This change does not represent the addition of significant new information as defined in Section 15088.5(a) of the CEQA Guidelines.

Response 28D: Comment acknowledged. Page 4.11-110 of the Revised Draft EIR is hereby amended as follows:

There is currently no natural gas service within the Specific Plan area. Natural gas service is proposed to be provided to the Specific Plan area by PG&E. According to commonly used factors, each dwelling unit consumes about 1,440 therms per dwelling unit per year. Commercial/business and professional uses consume approximately 63,600 therms per acre per year. One therm equals approximately one hundred cubic feet of natural gas, and varies according to the natural gas BTU content, distance and pressure of the distribution system. ~~PG&E is currently capable of providing natural gas service from existing facilities that are in close proximity to the Specific Plan area. Several natural gas lines terminate near the Sacramento County line and, depending upon engineering results, could be extended. These existing facilities are, however, insufficient to supply the overall Specific Plan demand. A 12-inch high pressure gas~~

~~transmission main is located six miles west of the Specific Plan area at Del Paso Road and Highway 70 in Sacramento County. Another 12 inch gas line is located on Cook Riolo Road about one mile east of the Specific Plan area (Bill Snyder, PG&E, Land Services, pers. comm., March 2002). The following natural gas facilities will need to be installed by PG&E in order to provide service to the Plan area:~~

- Transmission pipeline: PG&E will extend a 24-inch-diameter gas transmission pipeline from the terminus of the existing Line 123 on the northwest corner of Fiddymont and Baseline Road. The pipeline will extend down Baseline Road to South Brewer Road (approximately 5.0 miles). PG&E will install the pipeline on the south side of the road. A 50 foot permanent right-of-way is required for operation and maintenance of the pipeline.
- Pressure regulation stations: PG&E will construct three pressure regulation stations. One Pressure Limiting Station (PLS) is required to assure the proper pressures are maintained in the transmission system and two stations are required to reduce the pressure of the gas before delivering it to the distribution pipeline system. PG&E will construct the PLS station and Regulation Station #1 at the intersection of Baseline Road and Watt Avenue, and Regulation Station #2 at the intersection of Baseline Road and South Brewer/Dyer Lane. The pressure regulation stations will be installed in fenced yards above ground. The PLS station will cover an area of approximately 35 feet by 75 feet. The regulation stations will require two separate fenced yards covering an area of approximately 25 feet by 40 feet each. Slat fencing will be used to screen equipment from view and the facilities will use night lighting only in case of emergencies.
- Distribution pipeline: PG&E will install an 8-inch-diameter gas distribution line through the Placer Vineyards Specific Plan area. The line will extend south along Watt Avenue from Regulation Station #1, then head west along Dyer Lane, and north along Dyer Lane/South Brewer Road to Regulation Station #2. PG&E will install the distribution pipeline within a public utility easement (PUE) concurrent with the development of the subdivision.

~~PG&E extends natural gas service lines as demand increases. Engineering for new service lines is normally completed prior to commencement of development. New service line extensions are funded through development. Actual lines to be extended would depend on where development first occurs in the Specific Plan area. Actual hook up locations and sizing would be determined after engineering is completed (Scott Wilson, PG&E, Senior Land Project Analyst, pers. comm., March 2002).~~

This amendment does not represent the addition of significant new information as defined in Section 15088.5(a) of the CEQA Guidelines; instead it simply clarifies what specific facilities will be construction by PG&E in order to provide natural gas service to the Specific Plan area.

Response 28E: Commenter describes PG&E's road, railroad and waterbody crossing procedures. Comment acknowledged. Revised Draft EIR Mitigation Measures 4.412a and 4.4-12b describe preferred water body crossing techniques and procedures.

Response 28F: Commenter lists permits likely to be sought and studies likely to be performed by PG&E. Comment acknowledged. Permits and studies listed are consistent with expectations described in Revised Draft EIR Sections 4.3.4 (Water Quality) and 4.4 (Biological Resources).

Response 28G: Commenter lists practices of PG&E that are designed to minimize environmental impact. Comment acknowledged. No further response is required.

Response 28H: Commenter describes aesthetic and noise aspects of PG&E facility construction and operation. Comment acknowledged. Aesthetic impacts are described in Section 4.2 of the Revised Draft EIR. PG&E raises no new effects not already anticipated in the Revised Draft EIR. Temporary noise during construction is addressed in Section 4.9 of the Revised Draft EIR. PG&E raises no new effects not already anticipated in the Revised Draft EIR.

Letter 29



Community Development

311 Vernon Street
Roseville, California 95678-2649

May 19, 2006

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

Via: *Fax and Regular Mail*

Fax No. 530/886-3003
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Subject: City Comment on the Revised Draft Environmental Impact Report for the Placer Vineyards Specific Plan

Dear Ms. Lawrence:

Thank you for the opportunity to review and comment on the Revised Draft Environmental Impact Report (DEIR) for the Placer Vineyards Specific Plan dated March 2006. Significant strides have been made to address the City's concerns and we appreciate the on-going coordination between the County and the Placer Vineyard applicants on this complex project. This coordination during the preparation of the DEIR resulted in the identification and resolution of many issues.

However, due to the complexity of the project, the City of Roseville still has concerns regarding impacts due to inadequate or missing analysis. Agreement still needs to be reached on what constitutes feasible mitigation, particularly for significant impacts to the City of Roseville. Our primary concerns are highlighted in the comment overview section below. Specific comments from individual departments then follow. The main concerns are related to impacts on City services: wastewater, water, recycled water, police, fire, parks, recreation and libraries.

Significant effort will be required to prepare an adequate Final EIR that addresses the City's concerns and complies with both the State CEQA Guidelines and relevant City/County Agreements as noted below.

Transportation

Placer Vineyards is referenced in the 1995 City/County Settlement Agreement (SA) and the 1997 City/County Memorandum of Understanding.

A provision of the SA is that prior to circulating a draft EIR for public comment, County shall consult with the City regarding the proposed mitigation measures set forth in that document. While we have provided suggested mitigation for traffic, we have yet to come to agreement on the level of mitigation that will be provided for traffic impacts, a

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requirement of the SA. The City would like to expand mitigation measure 4.7-14c with respect to the project's participation towards the ITS/TDM.

The proposed project, alone and cumulatively, will significantly impact traffic and circulation within the City of Roseville. Additionally, the proposed project will utilize existing roadway capacity within the City and will accelerate the need for improvements identified in our Capital Improvement Program (CIP). The City's CIP expenditure plan does not contemplate this acceleration. In order to minimize the impacts to the City's transportation system and to mitigate for the project's impacts, the project should fund the City's need to expedite its ITS/TDM program by funding the capital outlay cost for the program. With the cost estimated at \$13 million and the Specific Plan estimated to develop 25,000 dwelling unit equivalents (DUEs), this would equate to a fee of \$520 per DUE within the Specific Plan.

B cont.

Fiscal and Public Service Levels

The SA requires that the legal, financial and practical ability to provide a full range of public services exists. We have significant concerns about the potential significant regional impacts of the project, especially on City residents, employees, facilities and services. As requested in the City's July 6, 1999 NOP comments we asked that the environmental, fiscal and other impacts of the project on all governmental agencies be fully analyzed and disclosed. While the DEIR references that the public facilities financing plan is available, we have not had the opportunity to review it yet, and such review may have influenced our DEIR comments. As soon as it becomes available we request a copy. In addition, the DEIR does not specifically address the fiscal and environmental impacts on service levels to the City of Roseville on police, fire, parks, recreation and libraries.

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Noise

Several City of Roseville streets will experience more than a doubling of traffic volumes as a result of the placer Vineyards Project. As requested in our NOP comments, the City asked that the noise analysis include areas within the City of Roseville. Areas of concern include sensitive receptors along Fiddymont Road, Baseline Road, Main Street, Wood Creek Oaks Boulevard and Blue Oaks Boulevard. While the DEIR acknowledges there will be traffic noise impacts outside the project area, there is no specific analysis. The DEIR should be revised to include noise modeling on City streets. In addition, feasible mitigation measures to reduce impacts on City of Roseville should be identified.

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Utilities

The San Juan water option has not been adequately analyzed in accordance with CEQA. The analysis is programmatic at best, lacks "project level" details, and is silent on potential aquatic impacts related to increased American River diversions. While the DEIR includes documentation for other backbone wastewater and recycled water systems, no backbone water supply exhibits are included for the San Juan option.

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Finally, it's important that utility demand and utility supply numbers provided in the DEIR be consistent with the utility master plan documents being prepared for the project. In some instances our specific comments reflect the intent to bring consistency between the supporting master plan documents and the DEIR. For example, the recycled water analysis did not rely on the recycled water master plan. As the retailer of recycled water to the plan area, it is important to the City of Roseville that these documents are complete and consistent and that appropriate mitigation measures are addressed. If these inconsistencies

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Ms. Lori Lawrence, Community Development Technician
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are not corrected, future actions could be found to be inconsistent with the Final EIR analysis.

F cont.

Public Works Department Comments

The proposed project will significantly impact seven City of Roseville intersections with the proposed project and up to 12 intersections under the Blueprint Alternative. Feasible mitigation is not available to reduce these impacts to a less than significant level.

G

1. Off-Site Improvements. Page 3-10 indicates that off-site improvements will include the widening of Baseline Road between the Specific Plan and Fiddymment/Walerga Road. It would be appropriate to detail & depict these off-site improvements proposed for Baseline Road, including modification to the intersection of Baseline/Fiddymment/Walerga, similar to those provided in Figures 3-8A – 3-8F. In addition, this widening and all other off-site improvements should be analyzed on a project level basis within the document. If these improvements are not analyzed at a project level, how will these projects be implemented? When will the required analysis be done?
2. Transportation System Management. Page 3-22 references that a Transportation System Management (TSM) plan will be prepared and adopted for the Specific Plan area for each group of projects at the time of building permit issuance and identifies potential TSM measures that may be implemented. While we agree with the implementation of a TSM plan for the Specific Plan, we feel the discussion should be expanded to include specific goals, requirements and implementation of the TSM plan (e.g., trip reduction/air quality goals, employment parameters, enforcement, etc.). These details are needed to fully understand the effectiveness of TSM as mitigation for transportation system impacts.
3. Public Facilities Financing Plan. Page 4.7-33 identifies that the Specific Plan applicants are developing a Public Facilities Financing Plan that will outline the funding and timing of transportation infrastructure, including off-site improvements required to support the planned development. Such a plan should clearly identify the timing for Baseline Road widening in order to minimize the impacts from the project. Absent review of the financing plan, it is not possible to determine whether the required improvements will be constructed in a manner that will minimize impacts within Roseville.
4. Cumulative No Project. Table 4.7-31 identifies several "Cumulative No Project" intersections where the LOS (v/c ratios) is substantially different than the intersection operations identified with the City's current CIP (see below). These locations should be checked and verified with regard to the discrepancies and the validity of the identified impacts/mitigations.

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Intersection	2020 CIP		Cumulative No Project (Placer Vineyards DEIR)	
	LOS	V/C	LOS	V/C
Fiddymment/Baseline	E	0.91	C	0.78
Foothills/Junction	D	0.83	C	0.81
Harding/Estates	E	0.92	D	0.88
Washington/Junction	D	0.82	C	0.76

5. Cumulative Plus Project. The following mitigation measure should be included for the Cumulative plus Project for the Harding Blvd./Will Rd. intersection – Modify striping on the eastbound approach on Wills Road to have dual left turn lanes and a shared

L

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- through/right lane and modify the striping on the westbound approach on Wills Road to have separate left, through and right lanes.
- 6. ITS/TDM Mitigation. As stated above, we would like to expand mitigation measure 4.7-14c with respect to the project's participation towards the ITS/TDM. The proposed project, alone and cumulatively, will significantly impact traffic and circulation within the City of Roseville. Additionally, the proposed project will utilize existing roadway capacity within the City and will accelerate the need for improvements identified in our Capital Improvement Program (CIP). The City's CIP expenditure plan does not contemplate this acceleration. In order to minimize the impacts to the City's transportation system and to mitigate for the project's impacts, the project should fund the City's need to expedite its ITS/TDM program by funding the capital outlay cost for the program. With the cost estimated at \$13 million and the Specific Plan estimated to develop 25,000 dwelling unit equivalents (DUEs), this would equate to a fee of \$520 per DUE within the Specific Plan. This fee is needed to ensure Roseville transportation system impacts are minimized to the degree feasible consistent with the SA.
- 7. Baseline Bicycle Under Crossing. Considering future Baseline Road traffic volumes and related safety concerns, the EIR should identify as mitigation a bike under-crossing at Baseline to connect Placer Vineyards bike trails to bike trails proposed in the Sierra Vista Specific Plan.

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Environmental Utilities Department Comments

Wastewater

- 8. Page 1-3, Section 4.11, Line 6: insert "the City of Roseville on behalf of the participants in" between "by" and "a".
- 9. Page 1-173, Table S-1, Impact # 4.11.8-2, Significance After Mitigation: The City disagrees with the "Significance After Mitigation" conclusion because (based on a draft Recycled Water Master Plan reviewed by the City of Roseville and not yet referenced or incorporated in the DEIR) projected recycled water demand would exceed recycled water supply regardless of where the project sends wastewater for treatment. As a result, the conclusion should be significant and unavoidable for the entire plan area, not just the SRCSD service area. See also comment number 19 below.
- 10. Page 4.11-39, Paragraph 1, Line 5: Replace "19.3" with "18.2 (19.3-1.1)". This number uses blueprint, please revise this paragraph accordingly, to be consistent with subsequent paragraph.
- 11. Page 4.11-43, Paragraph 1: The statement that "the difference in generation rates results from the attenuation of peak flows that occurs as wastewater flows from the outer reaches of the transmission system to the treatment plant" is not entirely correct. Treatment plants are rated for ADWF while transmission systems must transmit peak wet weather flows. This accounts for most of the difference. Please revise accordingly.
- 12. Page 4.11-49, Paragraph 7: Revise reference from "2,980,000" to "2,790,000" gallons. Table 6 shows 2.79 MGD.
- 13. Page 4.11-50, Paragraph 2, Line 7: Replace "19.3" with "18.2". TM4b prepared by RMC shows the DCWWTP can be expanded to 21 MGD under the higher strength wastewater - suggest this be referenced here.
- 14. Page 4.11-50, Paragraph 2, Line 12: "18.2 MGD", use this on Page 4.11-39 also.
- 15. Page 4.11-53, Paragraph 5, Line 7: Replace "19.3" with "18.2".
- 16. Page 4.11-87, Paragraph 6, Line 4: Replace "19.3" with "18.2".

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- 17. Page 4.11-89, Heading STATE: Please note that Order No. 97-147 has been updated with Amendment 2. | X
- 18. Page 4.11-92, Section 4.11.8-2, Paragraph 1: Please update this with the projected flow from the Brown & Caldwell RW Master Plan (a final version approved by the City of Roseville). | Y
- 19. Page 4.11-93, Mitigation Measures: The mitigation conclusion that impact 4.11.8-2 can be mitigated to a less than significant level under the scenario where all effluent for the project is sent to the DCWWTP is incorrect since no mitigation measures are proposed. As stated in comment 9 above, the wastewater generated by the project and thus the recycled water supply from DCWWTP is less than the recycled water demand anticipated for the project. Without mitigation the conclusion should be potentially significant and unavoidable. | Z

While the water supply analysis does not rely on the use of recycled water, the DEIR analyzes the supply and demand for recycled water. The Recycled Water Master Plan for the project (see general comment above for utilities) indicates that the project will rely on RW under a semi-aggressive scenario. If that is the case, then a supplemental supply of RW to the plan area for the peak July day may be needed. This supply could come from a dedicated well located adjacent to the RW tank and booster pump station. The EIR must include analysis of potential ground water impacts from this and any other groundwater supply wells proposed to serve the project. Also, the RW tank and booster pump station should be sized for the peak July day demand. | AA

In summary, the City is concerned with the apparent inconsistencies between the potable water supply and demand analyses and the recycled water supply and demand analyses. The RW analyses should be based on the RW Master Plan that is not yet complete. The City requests that this analysis be completed, that the water and RW analyses be consistent and that the RW analyses and mitigation measures be based on a complete and acceptable RW Master Plan. | BB

- 20. Page 4.11-94, Paragraph 2: The EIR should be consistent with information included in the most recent Recycled Water Master Plan. The information provided has been superseded. See also comment 19, above. | CC

Water

- 21. Page 4.3-35, last paragraph – A multi-party agreement is identified between agencies responsible for delivery of water from an alternative routing. Roseville will need to be included in this agreement if the route chosen uses the Roseville identified waterline in PFE. | DD
- 22. Figure 3.5 – Figure should identify metering facilities at points of connection with Roseville water distribution system. | EE
- 23. Page 4.11-63, third paragraph – The facilities identified to wheel water through Roseville should also identify a metering station at the point of connection at Baseline and Fiddymont. | FF

Community Services (Parks and Recreation, Libraries and Housing)

- 24. Volume I Improved parkland acreage – inconsistencies between the DEIR and Blueprint SP. Page 2-4 of the DEIR under "Land Use Changes", states that community and neighborhood park facilities have been increased to 217 acres. However, the Blueprint Specific Plan states that 247 acres of improved parkland are required to meet county standards (p. 7-1), and 249 acres have been counted in | GG

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- meeting the General Plan requirement (p. 7-1), but the BPSP Land Use Summary Table (Fig. 3-2) shows 217 acres of improved parkland in the Specific Plan. Failure to meet the minimum parkland requirements within the Specific Plan area could adversely impact City of Roseville parks and those of other neighboring jurisdictions.
- 25. Volume II Improved parkland acreage. Page 4.11-138: second paragraph text under "Proposed Parks . . ." and page 4.11-161 text of MM 4.11.13 both state that the Specific Plan proposes 217 acres of parks. See comment above for Volume 1. GG cont.
 - 26. General Plan policy on recreation programs. Page 4.11-137 and 138: General Plan policies 5.A.16 and 5.A.25 state that the County should not provide or become involved in the operation of recreation programs. The DEIR states that "two General Plan amendments . . . are proposed as part of the Specific Plan's consideration", which would allow the County to be involved in recreation programs if so provided in an approved Specific Plan. While that recommendation is a first step in increasing County involvement in recreation programs, we recommend a broader approach: that the County eliminate policies 5.A.16 and 5.A.25 and become involved in providing recreation programs in light of the shift in developing urban densities. If this does not occur, recreational programs in Roseville and other near by jurisdictions will be significantly impacted. HH

The Community Services Department has the following comments on the two Placer Vineyards specific plans.

P V Specific Plan

- 27. Discrepancies in population numbers; effect on park and open space requirements: Page 3-22 gives the estimated population at build-out as 34,762 (which would require 173 ac each of parkland and open space); page 7-1 shows a projected population of 32,854 and a requirement of 164 ac each of parkland and open space. Clarification of the population estimates and the minimum improved parkland requirements is needed. JJ
- 28. Page 9-9, under Development Sequencing, last paragraph the Public Utilities and Services chapter reference should be to Chapter VIII, not VII (Parks). KK
- 29. Page 9-11, first paragraph under Public Facilities Financing Plan: add "parks" to the list in the second sentence. LL
- 30. Libraries, Section 6.3.2 - Town Center: While Goal 6.18 definitely includes a library; Policy 6.27 states that the library *may* be included. A library would be a great addition to a Town Center within Placer Vineyards. If not included within the Town Center, a County library facility must be included somewhere within Placer Vineyards to serve the many thousands of new residents within the project. Existing library facilities alone within Placer County and City of Roseville cannot accommodate the new residents. MM

PV Blueprint Specific Plan

- 31. Discrepancies in park and open space acreage totals. Page 3-1, under "Land Use Diagram" states that there will be 980 ac of new parks and open space, page 3-13 under "Parks, Recreation, and Open Space" shows 970 ac, but the Land Use Summary Table (Fig. 3-2) shows only 930 ac, and the Executive Summary, p.ii-2 states 931 ac of parks and open space will be provided. Clarification of the amount of total acreage for parks and open space is needed. NN
- 32. Minimum improved parkland requirement: Page 7-1, third paragraph under "Context" states that approximately 247 acres of improved parkland must be provided in the OO

Ms. Lori Lawrence, Community Development Technician
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Specific Plan. Page 7-1 under "Parks" states that there will be a total of 260 ac of public and private parks, with 249 ac counted toward satisfying the County GP requirement. But the Land Use Summary Table (Fig. 3-2) shows only 217 ac of improved parkland. If the specific plan area does not meet their minimum parkland requirement, parks in the City of Roseville are likely to be impacted.

OO cont.

33. Table 3-2 Land Use Summary. In the Land Use column under "Parks" (P), there is a footnote designated "4" but no explanation follows.

PP

34. Discrepancies in population numbers; effect on park and open space requirements. Page ii-2 in the Executive Summary, # 6 states that the planned community resulting from the Specific Plan will have a population of about 35,000; page 3-1 under "Land Use Diagram" states that at build-out the population will be about 52,000 (which would require 260 ac of improved parkland); page 7-1, third paragraph, states that based on the projected population of 49,416, approximately 247 acres of improved parkland must be provided in the Specific Plan. Because the minimum acreage of improved parkland is based on population, clarification of the population estimates and the minimum required improved parkland is needed. If the specific plan area does not meet their minimum parkland requirement, parks in the City of Roseville are likely to be impacted.

QQ

If Figure 3-2 is correct (see comment 34 on parks acreage above), the 217 ac of improved parkland would not meet the requirements of a population of 49,400 (247 ac) or 52,000 (260 ac). If the specific plan area does not meet their minimum parkland requirement, parks in the City of Roseville are likely to be impacted.

35. Page 9-9, under Development Sequencing, last paragraph the Public Utilities and Services reference should be to Chapter VIII, not VII (Parks).

RR

36. Pg. 9-11, first paragraph under Public Facilities Financing Plan; add "parks" to the list in the second sentence.

SS

37. Libraries, page 3-19: In the designation of the Town Center components, this statement is made: "A village green and community gathering area to accommodate civic uses such as a library facility, recreation center, and government office." While mentioning these possible civic presences, there is no strong statement that each of them will be included. A library facility must be included somewhere with Placer Vineyards because existing facilities alone in both City of Roseville and Placer County will not be able to accommodate the large number of new residents this project will bring to our area.

TT

Fire Department Comments

38. Volume II, Public Services, First Fire Station. Fire station construction timing is not consistent between the Specific Plan and the DEIR. The Specific Plan states the first fire station will be constructed and equipped prior to the issuance of the first building permit for the first dwelling unit west of Watt Avenue. The DEIR calls for the first fire station at the time the first occupancy permit is issued. To ensure Roseville emergency services are not significantly impacted, the Specific Plan should be modified to be consistent with the DEIR and the first fire station should be operational at the time the first occupancy permit is issued.

UU

39. ISO Rating. The Placer County General Plan "encourages" local fire protection agencies to maintain an ISO rating of 4 within urban areas. Currently, the ISO rating for the Placer County Fire Department/CDF area is 5 within 1,000 feet of a fire hydrant and 8 in a rural area such as the Placer Vineyards project area. The Roseville Fire Department has an ISO rating of 3. A higher ISO rating will likely result in a higher number of mutual air response calls. The Placer Vineyards project area should strive to achieve the same level of fire protection for this urban development

VV

*Ms. Lori Lawrence, Community Development Technician
Revised Draft EIR for Placer Vineyards Specific Plan*

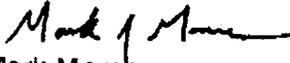
*May 19, 2006
Page 8 of 8*

as compared to similar neighboring development projects to ensure the Roseville Fire Department is not impacted.

VV cont.

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

Sincerely,



Mark Morse
Environmental Coordinator

- cc: John Sprague
Paul Richardson
Kathy Pease
Rob Jensen
Derrick Whitehead
Kelye McKinney
Art O'Brien
Dennis Mathisen
Kelly Casanova
Dianne Bish

Community Development

311 Vernon Street
Roseville, California 95678-2649

May 26, 2006

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

Via: *Fax and Regular Mail*

Fax No. 530/886-3003
Page 1 of 4

Subject: City Comment on the Revised Draft Environmental Impact Report for the Placer Vineyards Specific Plan – Supplemental Transportation Division Comments

Dear Ms. Lawrence:

Attached, please find comments on the Revised Draft Environmental Impact Report (DEIR) for the Placer Vineyards Specific Plan dated March 2006 from the City of Roseville Public Works Transportation Division (memo from Mike Dour to Rob Jensen dated May 26, 2006). These comments supplement those contained in our May 19, 2006 letter. We apologize for the fact that these comments are late and hope they can still be included and addressed in the project's Final EIR.

Should you have any questions concerning the enclosed comments, please contact Mike Dour at 746-1300.

Sincerely,


Mark Morse
Environmental Coordinator

cc: John Sprague
Paul Richardson
Kathy Pease
Rob Jensen
Derrick Whitehead
Kelye McKinney
Art O'Brien
Dennis Mathisen
Kelly Casanova
Dianne Bish

Memorandum

TO: Rob Jensen
 FROM: Michael Dour, Administrative Analyst/Bikeway Planner
 DATE: May 26, 2006
 SUBJECT: Placer Vineyards DEIR

The Transportation Division of Public Works has the following comments to offer:

1. Bus Rapid Transit Policy 5.16 -- Bus Rapid Transit (BRT) would be a regional operation. Please describe the financing method and timing of construction of the BRT lanes. The type of BRT service to be provided along Watt Ave. has not been determined. Would the proposed R-O-W prevent certain types of BRT from being implemented, e.g. dedicated lanes along one side of Watt Ave. for BRT travel in both directions with a divider for off-loading pedestrians? Also, is Watt Ave intended to be six lanes plus two additional lanes for BRT, or eight lanes plus two additional lanes for BRT?	WW
2. Policy 5.12 should describe the common barriers to access by pedestrians and bicyclists (major arterial roads with 4 or more lanes, soundwalls, cul-de-sacs, private gated communities), and should include measures to minimize their impact. Also, the plan should describe how bicycle access would be provided to the planned Sierra Vista, Curry Creek and Regional University projects.	XX
3. Policy 5.14 should describe methods that will be used to avoid use of sound walls, thus ensuring better mobility for residents. For example, a public street may be used to separate incompatible land uses instead of a sound wall, thereby maintaining connections between the uses while providing adequate separation. Also, the use of LDR along major arterials should be minimized.	YY
4. Regarding Item 9 of Policy 5.23, the EIR should include one or more figures showing how traffic calming will be used as trails cross major streets.	ZZ
5. Page 4.7-54 -- ADA Dial A Ride service only provides coverage within ¾-mile in either direction from a fixed route. It also requires that only passengers certified as ADA can use the DAR system. The County presently does not have an ADA certification process for its DAR passengers. What areas of the specific plan would not have any transit services? How would an ADA certification process be addressed in the new specific plan? This also does not correlate with the description of DAR services stated in Page 4.7-30, which would be a general public DAR service for the entire plan area. Please clarify the discrepancy. The City of Roseville operates a general public DAR service to all areas within its boundaries.	AAA
	BBB
	CCC
	DDD
	EEE

6.	Page 4.7-55 -- The ADEIR states that funding would be substantial and uncertain. Yet mitigation measure 4.7-10a indicates that the CSA will fund the cost for transit services. Exactly what transit services, new capital purchases, and facilities will be funded by the CSA? Further, complete impacts to PCT may not have been assessed. For example, if a new maintenance facility is to be created to maintain the buses to be operated in this area, how will an extension of the main natural gas line to the new maintenance facility be provided for fueling?	FFF
7.	Page 4.7-55- No costs appear to be assigned to the creation and on-going operation of BRT. Will this project CSA be expected to fund a portion of the BRT?	GGG
8.	Page 4.7-55 -- Please provide a proposed transit route map and designate which corners will have planned bus shelters and bus shelter pads. Please address how buses will stop at each corner, e.g. using an acceleration lane, a specific turnout, in a travel lane, or something else.	HHH
9.	Page 4.7-55 -- Please address who will be responsible for bus shelter installation and maintenance.	III
10.	Page 4.7-55 -- The services planned for transit should provide some reasonable assumptions for headways and days and hours of operation to develop requirements for fleet storage, fueling needs, maintenance operations, etc.	JJJ
11.	Page 4.7-55 -- Please consider relocating the park and ride lot to Baseline at Watt Ave. as a way to better serve the express commuter run to Sacramento. Our experience has shown that few people use the park and ride lots for fixed route services. How many spaces are needed for the park and ride lot? Who will provide the park and ride lot and maintain it? Video security should be considered at the park and ride lot.	KKK
12.	Page 4.7.55 -- The City may be limited in its ability to continue to expand other transfer points to accommodate buses from outside of its boundaries that were not included in earlier planning efforts, e.g. The Galleria Transfer Point. The impacts and costs associated with these services should be evaluated.	LLL
13.	Page 4.7-56 -- A future light rail station is planned for Antelope Rd. and Roseville Rd. Consideration of this future improvement should be examined for transit services to and from the plan area.	MMM
14.	Page 4.7-56 -- The EIR should provide an evaluation of anticipated vehicle miles traveled (VMT) under the different scenarios/alternatives.	NNN
15.	Page 4.7-56 -- Please consider a mitigation measure that would require the project to create transit-friendly development by implementing pedestrian & transit oriented developments, design, density and diversity. Effective design and placemaking is just as important as the designation of a corridor for transit, walking or bicycling.	OOO
16.	Page 4.7-56 -- Please consider a mitigation measure that increases non-residential densities to between 0.5 and 1.0 FAR and residential densities to approximately 20 units per acre or more at specific nodes along major transit corridors. Also, please consider other design methods, such as limited or priced parking at major nodes, to encourage use of alternative means of transportation, such as walking, bicycling or transit.	PPP
17.	Page 4.7-57 - Increased Demand for Bicycle Trips -- Please consider a mitigation measure that will implement the use of bike lockers and employee showers and lockers for large employers to encourage bicycling and walking as alternative commute methods.	QQQ
		RRR
		SSS
		TTT

<p>18. Page 4.7-57 – Increased Demand for Bicycle Trips – This section notes the use of bike trails within landscape corridors on arterial streets. The EIR should note that on major arterials these facilities are considered uncomfortable and are perceived as unsafe by much of the bicycling public due to high traffic volumes and speeds and the presence of curb cuts.</p>	<p>UUU</p>
<p>19. What will the criteria be to evaluate exceptions to designated access points along thoroughfare roads, i.e., how will the term "benefit overall traffic flows" be evaluated? For instance, any large retail center can potentially show a benefit to overall traffic by allowing multiple points of access if traffic comes directly from an adjacent travel lane. In fact, a case could be made that the more driveway access points provided for any development, the better traffic operations on-street would become.</p>	<p>VVV</p>

LETTER 29 MARK MORSE, CITY OF ROSEVILLE

Response 29A: Commenter introduces letter and indicates that there are still issues to be addressed. Comment acknowledged. The County’s responses are presented below.

Response 29B: Commenter proposes to expand Mitigation Measure 4.7-14c with respect to ITS/TDM. Mitigation Measure 4.7-14c requires that the proposed project pay its fair share toward the Intelligent Transportation System (ITS). The fair share proportion will be determined in discussions between the City and the County, pursuant to both the Settlement Agreement and Mitigation Measure 4.7-2(a). Please also see Response to Comment 29M.

Response 29C: Commenter requests Financing Plan and wants fiscal and environmental analysis of impacts to the City of Roseville in Revised Draft EIR. See Responses to Comments 15D and 24B regarding the Financing Plan. The Financing Plan was provided to the City of Roseville on July 3, 2006. As described in Response to Comment 24B, the County, despite having addressed the Financing Plan in the Partially Recirculated Draft EIR, believes that CEQA does not require that financing and fiscal analysis be included in the Revised Draft EIR. The County is, however, working with the City of Roseville to ensure that all reasonable precautions are taken to avoid fiscal and environmental effects on City government, facilities and services. From the CEQA perspective, this is accomplished through the myriad of mitigation measures contained in Section 4.11 of the revised Draft EIR related to each category of service and related facilities. The project is required through the various mitigation measures to fully fund and mitigate any potential fiscal and related environmental effect that could occur.

Response 29D: The Commenter requests that the noise analysis include additional noise modeling on City of Roseville streets. The Revised Draft EIR acknowledges that noise-related impacts may occur within the City of Roseville (see Impacts 4.9-5 and 4.9-7). The City, however, has requested that additional areas be studied. In response to the City’s request, a supplemental analysis of noise related impacts within the City was performed utilizing the predicted traffic volumes appearing in the Partially Recirculated Revised Draft EIR. Included were additional roadway segments in the City of Roseville on Blue Oaks Boulevard, Pleasant Grove Boulevard, Baseline Road, Junction Boulevard, Woodcreek Oaks Boulevard, and Foothill Boulevard. The following revised tables present the results of the analysis in its entirety and supersede those in the Revised Draft EIR.

Revised Table 4.9-2 Existing Traffic Noise Levels Vicinity of Placer Vineyards Specific Plan Area		
Road	Segment Description	DNL@ 75'
Baseline Road	East of County Line	66
Baseline Road	East of Locust	66
Baseline Road	East of Brewer	66
Baseline Road	East of Palladay	66
Baseline Road	East of 16th Street	67
Baseline Road	East of 12th Ave	67
Baseline Road	East of Watt Avenue	67
Baseline Road	East of Dyer Street	67

Revised Table 4.9-2 Existing Traffic Noise Levels Vicinity of Placer Vineyards Specific Plan Area		
Walerga Road	South of Baseline Road	67
Walerga Road	North of PFE Road	66
Watt Avenue	South of Baseline Road	63
Watt Avenue	South of Dyer Street	63
PFE Road	East of Watt Avenue	61
PFE Road	East of Walerga Road	63
Elverta Road	East of Hwy 70/99	63
Elverta Road	East of Rio Linda Boulevard	65
Elverta Road	East of 16th Street	67
Elverta Road	West of Watt Avenue	69
Watt Avenue	North of Elverta Road	67
Watt Avenue	North of Antelope Road	64
Watt Avenue	North of Elkhorn Road	65
Watt Avenue	North of Don Julio Road	70
Watt Avenue	North of Airbase	71
Walerga Road	North of Elverta Road	63
Walerga Road	North of Antelope Road	65
Walerga Road	North of Elkhorn Road	69
16 th Street	North of Elverta Road	49
Watt Avenue	North of Roseville Road	71
Watt Avenue	North of I-80	72
Sorento Road	North of Elverta Road	55
Elwyn Road	North of Elverta Road	54
Palladay Road	North of Elverta Road	51
Locust Road	South of Baseline	54
Pleasant Grove	North of County Line	54
Locust Road	North of County Line	54
Palladay Road	North of County Line	51
16th Street	South of Elverta	51
Dry Creek	North of Elkhorn	64
Dry Creek	South of Elkhorn	64
Elkhorn	Watt to Walerga	64
Elkhorn	Walerga to Roseville	66
Blue Oaks Blvd	Fiddymment to Woodcreek	64
	Woodcreek to Foothills	69
	Foothills to Industrial	70
Pleasant Grove Blvd	Fiddymment to Woodcreek	60
	Woodcreek to Foothills	67
	Foothills to Industrial	70
Junction Blvd	Woodcreek to Foothills	62
	Foothills to Industrial	66
Baseline Road	Fiddymment to Junction	66
	Junction to Woodcreek	66
	Woodcreek to Country Club	66
	Country Club to Foothills	67
	Foothills to Washington	64

Revised Table 4.9-2 Existing Traffic Noise Levels Vicinity of Placer Vineyards Specific Plan Area		
Fiddymment Road	Baseline to Blue Oaks	67
Woodcreek Oaks	Baseline to Pleasant Grove	65
	Pleasant Grove to Blue Oaks	65
Foothills Blvd	Baseline to Pleasant Grove	69
	Pleasant Grove to Blue Oaks	65
	North of Blue Oaks	60
Source: Brown-Buntin Associates, 2006		

Revised Table 4.9-5 Existing Plus Project Traffic Noise Levels Within Specific Plan Area					
Roadway	Segment	DNL @ 75'	Dist. To 60 dB DNL, Ft	Dist. To 70 dB DNL, Ft	Significant Impact
Baseline Road	East of County Line	68	256	55	Yes
Baseline Road	East of Locust Road	68	257	55	Yes
Baseline Road	East of Brewer Road	69	276	60	Yes
Baseline Road	East of Palladay Road	70	334	72	Yes
Baseline Road	East of 16 th Street	70	343	74	Yes
Baseline Road	East of 12 th Avenue	71	387	80	Yes
Baseline Road	East of Watt Avenue	71	416	90	Yes
Baseline Road	East of Dyer Lane	71	431	93	Yes
Walerga Road	South of Baseline Road	67	232	50	Yes
Watt Avenue	South of Baseline Road	66	184	40	Yes
Watt Avenue	South of Dyer Lane	70	361	78	Yes
Source: Brown-Buntin Associates, 2006					

Revised Table 4.9-6 Existing Plus Project Noise Levels Outside Specific Plan Area				
Road	Segment	DNL @ 75'		Change
		Existing No Project	Existing Plus Project	
Baseline Road	East of County Line	66	68	2
Walerga Road	South of Baseline Road	67	67	0
Walerga Road	North of PFE Road	66	66	0
PFE Road	East of Walerga Road	63	64	1
Watt Avenue	North of Elverta Road	67	71	4
Watt Avenue	North of Antelope Road	64	65	1
Watt Avenue	North of Elkhorn Road	65	66	1
Walerga Road	North of Elverta Road	63	63	0
Walerga Road	North of Antelope Road	65	66	1
Walerga Road	North of Elkhorn Road	69	70	1
16th Street	North of Elverta Road	49	64	15
Watt Avenue	North of I-80	72	72	0
Sorento Road	North of Elverta Road	55	58	3
Elwyn Road	North of Elverta Road	54	62	8

Revised Table 4.9-6 Existing Plus Project Noise Levels Outside Specific Plan Area				
Road	Segment	DNL @ 75'		Change
		Existing No Project	Existing Plus Project	
Locust Road	South of Baseline	54	54	0
Pleasant Grove Road	North of County Line	54	58	4
Locust Road	North of County Line	54	62	8
16th Street	South of Elverta	51	59	8
Dry Creek	North of Elkhorn	64	64	0
Dry Creek	South of Elkhorn	64	65	1
Elkhorn	Watt to Walerga	64	64	0
Elkhorn	Walerga to Roseville	66	67	1
Blue Oaks Blvd	Fiddymment to Woodcreek	64	64	0
	Woodcreek to Foothills	69	69	0
	Foothills to Industrial	70	70	0
Pleasant Grove Blvd	Fiddymment to Woodcreek	60	63	3
	Woodcreek to Foothills	67	68	1
	Foothills to Industrial	70	70	0
Junction Blvd	Woodcreek to Foothills	62	62	0
	Foothills to Industrial	66	66	0
Baseline Road	Fiddymment to Junction	66	69	3
	Junction to Woodcreek	66	68	2
	Woodcreek to Country Club	66	68	2
	Country Club to Foothills	67	69	2
	Foothills to Washington	64	65	1
Fiddymment Road	Baseline to Blue Oaks	67	68	1
Woodcreek Oaks	Baseline to Pleasant Grove	65	65	0
	Pleasant Grove to Blue Oaks	65	65	0
Foothills Blvd	Baseline to Pleasant Grove	69	69	0
	Pleasant Grove to Blue Oaks	65	65	0
	North of Blue Oaks	60	60	0

Source: Brown-Buntin Associates, 2006

Revised Table 4.9-7 2025 Plus Project Traffic Noise Levels Within Specific Plan Area					
Road	Segment	DNL @ 75'	Dist. To 60 dB DNL, Ft.	Dist. To 70 dB DNL, Ft.	Significant Impact
Baseline Road	East of County Line	73	546	118	Yes
Baseline Road	East of Locust Road	73	547	118	Yes
Baseline Road	East of Brewer Road	73	550	119	Yes
Baseline Road	East of Palladay Road	73	587	127	Yes
Baseline Road	East of 16 th Street	73	5582	125	Yes
Baseline Road	East of 12 th Avenue	74	632	136	Yes
Baseline Road	East of Watt Avenue	73	564	121	Yes
Baseline Road	East of Dyer Lane	73	587	127	Yes
Walerga Road	South of Baseline Road	71	425	92	Yes
Watt Avenue	South of Baseline Road	72	450	97	Yes

Revised Table 4.9-7 2025 Plus Project Traffic Noise Levels Within Specific Plan Area					
Road	Segment	DNL @ 75'	Dist. To 60 dB DNL, Ft.	Dist. To 70 dB DNL, Ft	Significant Impact
Watt Avenue	South of Dyer Lane	72	502	108	Yes
Source: Brown-Buntin Associates, 2006					

Revised Table 4.9-8 2025 Plus Project Noise Levels Outside Specific Plan Area					
Road	Segment	DNL@ 75'		Change	Significant Impact
		2025 No Project	2025 Plus Project		
Baseline Road	East of County Line	72	73	1	No
Walerga Road	South of Baseline Road	72	71	-1	No
Walerga Road	North of PFE Road	72	72	0	No
PFE Road	East of Walerga Road	67	67	-1	No
Watt Avenue	North of Elverta Road	72	72	0	No
Watt Avenue	North of Antelope Road	66	66	0	No
Watt Avenue	North of Elkhorn Road	68	68	0	No
Walerga Road	North of Elverta Road	66	66	0	No
Walerga Road	North of Antelope Road	66	66	0	No
Walerga Road	North of Elkhorn Road	70	70	0	No
16th Street	North of Elverta Road	63	67	4	Yes
Watt Avenue	North of I-80	71	71	0	No
Sorento Road	North of Elverta Road	65	65	0	No
Elwyn Road	North of Elverta Road	69	69	0	No
Locust Road	South of Baseline	63	60	-3	No
Pleasant Grove	North of County Line	65	65	0	No
Locust Road	North of County Line	63	64	1	No
16th Street	South of Elverta	61	63	2	No
Dry Creek	North of Elkhorn	65	66	1	No
Dry Creek	South of Elkhorn	65	66	1	No
Elkhorn	Watt to Walerga	66	66	0	No
Elkhorn	Walerga to Roseville	68	69	1	No
Blue Oaks Blvd	Hayden to Fiddymont	67	67	0	No
	Fiddymont to Woodcreek	70	70	0	No
	Woodcreek to Foothills	72	72	0	No
	Foothills to Industrial	72	72	0	No
Pleasant Grove Blvd	Hayden to Fiddymont	68	68	0	No
	Woodcreek to Foothills	670	71	1	No
	Foothills to Industrial	71	71	0	No
	East of Industrial	71	71	0	No
Junction Blvd	Baseline to Woodcreek	67	69	2	Yes
	Woodcreek to Country Club	66	68	2	Yes
	Country Club to Foothills	66	68	2	Yes
Baseline Road	Fiddymont to Woodcreek	70	72	2	Yes
	Woodcreek to Foothills	69	69	0	No
	Foothills to Washington	65	65	0	No

Revised Table 4.9-8 2025 Plus Project Noise Levels Outside Specific Plan Area					
Road	Segment	DNL@ 75'		Change	Significant Impact
		2025 No Project	2025 Plus Project		
Fiddymment Road	Baseline to Village Green	68	68	0	No
	Village Green to Blue Oaks	69	69	0	No
	Blue Oaks to Hayden	67	67	0	No
Woodcreek Oaks	Baseline to Pleasant Grove	66	67	1	No
	Pleasant Grove to Blue Oaks	68	68	0	No
Foothills Blvd	Vineyard to Baseline	71	72	0	No
	Baseline to Junction	71	71	0	No
	North of Blue Oaks	69	69	0	No

Source: Brown-Buntin Associates, 2006

Based on impact evaluation criteria utilized in the Revised Draft EIR (see page 4.9-14), some roadway segments within the City of Roseville under existing plus project conditions (Revised Table 4.9-6) would exceed the identified thresholds (segments on Pleasant Grove Boulevard between Fiddymment Road and Woodcreek Oaks Boulevard and segments on Baseline Road between Fiddymment Road and Foothills Boulevard). Impact 4.9-5 addresses traffic-generated noise impacts that could occur in off-site locations and concludes that such impacts would be significant. Although the Revised Draft EIR concludes that sound walls and other measures, where feasible, could mitigate off-site noise impacts, because the identified roadway segments are located in another jurisdiction, Placer County cannot compel that jurisdiction to adopt or implement mitigation measures. Therefore the impact is reported to remain significant and unavoidable. As a practical matter, the identified roadway segments already contain sound walls adjacent to sensitive receptors that are designed to mitigate traffic related impacts.

Similarly, for the cumulative plus project condition (Revised Table 4.9-8), Junction Boulevard between Baseline Road and Foothills Boulevard and Baseline Road between Fiddymment Road and Woodcreek Oaks Boulevard exceed identified thresholds for increases in traffic-related noise. These impacts are anticipated by Impact 4.9-7 of the Revised Draft EIR, which finds cumulative off-site noise increases to be significant and unavoidable.

Impacts from traffic-related noise were also reexamined under the Blueprint Alternative and the results are reported on the following revised tables.

Revised Table 6-38 Existing Plus Project (Blueprint) Within Specific Plan Area						
Road	Segment	DNL @ 75				Significant Impact
		Specific Plan	Blueprint Alternative	Dist. To 60 dB DNL, Ft.	Dist. To 70 dB DNL, Ft.	
Baseline Road	East of County Line	68	69	281	61	Yes
Baseline Road	East of Locust Road	68	69	283	61	Yes
Baseline Road	East of Brewer Road	69	69	305	66	Yes

Revised Table 6-38 Existing Plus Project (Blueprint) Within Specific Plan Area						
Road	Segment	DNL @ 75				Significant Impact
		Specific Plan	Blueprint Alternative	Dist. To 60 dB DNL, Ft.	Dist. To 70 dB DNL, Ft.	
Baseline Road	East of Palladay Road	70	70	355	77	Yes
Baseline Road	East of 16 th Street	70	71	378	81	Yes
Baseline Road	East of 12 th Avenue	71	71	410	88	Yes
Baseline Road	East of Watt Avenue	71	72	440	95	Yes
Baseline Road	East of Dyer Lane	71	72	464	100	Yes
Walerga Road	South of Baseline Road	67	68	235	51	Yes
Watt Avenue	South of Baseline Road	66	66	200	43	Yes
Watt Avenue	South of Dyer Lane	70	71	394	85	Yes

Source: Brown-Buntin Associates, 2006

Revised Table 6-39 Existing Plus Project (Blueprint) Noise Levels Outside Specific Plan Area				
Road	Segment	DNL @ 75'		Change
		Existing No Project	Existing Plus Blueprint	
Baseline Road	East of County Line	66	69	3
Walerga Road	South of Baseline Road	67	67	0
Walerga Road	North of PFE Road	66	66	0
PFE Road	East of Walerga Road	63	65	2
Watt Avenue	North of Elverta Road	67	71	4
Watt Avenue	North of Antelope Road	64	66	2
Watt Avenue	North of Elkhorn Road	65	66	1
Walerga Road	North of Elverta Road	63	63	0
Walerga Road	North of Antelope Road	65	66	1
Walerga Road	North of Elkhorn Road	69	70	1
16 th Street	North of Elverta Road	49	65	16
Watt Avenue	North of I-80	72	72	0
Sorento Road	North of Elverta Road	55	61	6
Elwyn Road	North of Elverta Road	54	64	10
Locust Road	South of Baseline	54	56	2
Pleasant Grove Road	North of County Line	54	61	7
Locust Road	North of County Line	54	64	10
16 th Street	South of Elverta	50	62	12
Dry Creek	North of Elkhorn	64	64	0
Dry Creek	South of Elkhorn	64	65	1
Elkhorn	Watt to Walerga	64	64	0
Elkhorn	Walerga to Roseville	66	67	1
Blue Oaks Blvd	Fiddymont to Woodcreek	64	64	0
	Woodcreek to Foothills	69	69	0
	Foothills to Industrial	70	70	0
Pleasant Grove Blvd	Fiddymont to Woodcreek	60	63	3

Revised Table 6-39 Existing Plus Project (Blueprint) Noise Levels Outside Specific Plan Area				
Road	Segment	DNL @ 75'		Change
		Existing No Project	Existing Plus Blueprint	
	Woodcreek to Foothills	67	68	1
	Foothills to Industrial	70	71	1
Junction Blvd	Woodcreek to Foothills	62	63	1
	Foothills to Industrial	66	66	0
Baseline Road	Fiddymment to Junction	66	69	3
	Junction to Woodcreek	66	68	2
	Woodcreek to Country Club	66	69	3
	Country Club to Foothills	67	69	2
	Foothills to Washington	64	65	1
Fiddymment Road	Baseline to Blue Oaks	67	68	1
Woodcreek Oaks	Baseline to Pleasant Grove	65	65	0
	Pleasant Grove to Blue Oaks	65	65	0
Foothills Blvd	Baseline to Pleasant Grove	69	69	0
	Pleasant Grove to Blue Oaks	65	65	0
	North of Blue Oaks	60	60	2

Source: Brown-Buntin Associates, 2006

Revised Table 6-40 Year 2025 Plus Project (Blueprint) Within Specific Plan Area						
Road	Segment	DNL @ 75'		Dist. To 60 dB DNL, Ft.	Dist. To 70 dB DNL, Ft.	Significant Impact
		Specific Plan	Blueprint Alt.			
Baseline Road	East of County Line	73	73	572	123	Yes
Baseline Road	East of Locust Road	73	73	576	124	Yes
Baseline Road	East of Brewer Road	73	73	573	123	Yes
Baseline Road	East of Palladay Road	73	74	608	131	Yes
Baseline Road	East of 16 th Street	73	74	608	131	Yes
Baseline Road	East of 12 th Avenue	74	74	658	142	Yes
Baseline Road	East of Watt Avenue	73	73	584	126	Yes
Baseline Road	East of Dyer Lane	73	74	600	129	Yes
Walerga Road	South of Baseline Road	71	71	433	93	Yes
Watt Avenue	South of Baseline Road	72	72	453	98	Yes
Watt Avenue	South of Dyer Lane	72	73	521	112	Yes

Source: Brown-Buntin Associates, 2006

**Revised Table 6-4I
2025 Plus Project (Blueprint) Noise Level Outside Specific Plan Area**

Road	Segment	DNL @ 75'		Change	Significant Impact
		2025 No Project	2025 Plus Blueprint		
Baseline Road	East of County Line	72	73	1	No
Walerga Road	South of Baseline Road	72	71	-1	No
Walerga Road	North of PFE Road	72	72	0	No
PFE Road	East of Walerga Road	67	67	0	No
Watt Avenue	North of Elverta Road	72	72	0	No
Watt Avenue	North of Antelope Road	66	66	0	No
Watt Avenue	North of Elkhorn Road	68	68	0	No
Walerga Road	North of Elverta Road	66	66	0	No
Walerga Road	North of Antelope Road	66	66	0	No
Walerga Road	North of Elkhorn Road	70	70	0	No
16 th Street	North of Elverta Road	63	67	4	Yes
Watt Avenue	North of I-80	71	71	0	No
Sorento Road	North of Elverta Road	65	65	0	No
Elwyn Road	North of Elverta Road	69	70	1	No
Locust Road	South of Baseline	63	60	-3	No
Pleasant Grove	North of County Line	65	65	0	No
Locust Road	North of County Line	63	65	2	No
16 th Street	South of Elverta	61	64	3	Yes
Dry Creek	North of Elkhorn	65	66	1	No
Dry Creek	South of Elkhorn	65	66	1	No
Elkhorn	Watt to Walerga	66	66	0	No
Elkhorn	Walerga to Roseville	68	69	0	No
Blue Oaks Blvd	Hayden to Fiddymnt	67	68	1	No
	Fiddymnt to Woodcreek	70	70	0	No
	Woodcreek to Foothills	72	72	0	No
	Foothills to Industrial	72	72	0	No
Pleasant Grove Blvd	Hayden to Fiddymnt	68	68	0	No
	Woodcreek to Foothills	70	71	1	No
	Foothills to Industrial	71	72	1	No
	East of Industrial	71	71	0	No
Junction Blvd	Baseline to Woodcreek	67	69	2	Yes
	Woodcreek to Country Club	66	69	3	Yes
	Country Club to Foothills	66	68	2	Yes
Baseline Road	Fiddymnt to Woodcreek	70	72	2	Yes
	Woodcreek to Foothills	69	70	1	No
	Foothills to Industrial	65	65	0	No
Fiddymnt Road	Baseline to Village Green	68	68	0	No
	Village Green to Blue Oaks	68	68	0	No
	Blue Oaks to Hayden	67	67	0	No
Woodcreek Oaks	Baseline to Pleasant Grove	66	68	2	Yes
	Pleasant Grove to Blue Oaks	68	68	0	No

Revised Table 6-4I					
2025 Plus Project (Blueprint) Noise Level Outside Specific Plan Area					
Road	Segment	DNL @ 75'		Change	Significant Impact
		2025 No Project	2025 Plus Blueprint		
Foothills Blvd	Vineyard to Baseline	71	72	1	No
	Baseline to Junction	71	71	0	No
	North of Blue Oaks	69	69	0	No

Source: Brown-Buntin Associates, 2006

For the Blueprint Alternative, the existing plus Blueprint traffic-related noise level exceeds the identified thresholds on segments located on Pleasant Grove Boulevard between Fiddymment Road and Woodcreek Oaks Boulevard, and along Baseline Road between Fiddymment Road and Foothills Boulevard. The Revised Draft EIR found off-site traffic-related noise impacts to be significant and unavoidable under the Blueprint Alternative due to the potential lack of feasible mitigation and the County’s inability to require another jurisdiction to adopt mitigation measures. Under the Blueprint Alternative cumulative condition, roadway segments along Junction Boulevard between Baseline Road and Foothills Boulevard, along Baseline Road between Fiddymment Road and Woodcreek Oaks Boulevard, and along Woodcreek Oaks Boulevard between Baseline Road and Pleasant Grove Boulevard were found to exceed the established thresholds.

The supplemental analysis of noise related impacts utilizing predicted traffic volumes from the Partially Recirculated Revised Draft EIR also identified additional roadway segments in Placer and Sacramento counties that were found to exceed identified thresholds, as shown in the above tables. Revised Draft EIR Appendix K has been updated to include the new technical data related to the noise analysis.

Response 29E: The commenter states that the “San Juan water option” has not been adequately analyzed. The analysis of the “San Juan water option” is programmatic and if the option is needed will be subject to further project-level analysis relative to improvements which may be needed at the San Juan Peterson Water Treatment Plant. The San Juan option (secondary initial surface water supply) is described in the document to provide full disclosure of all potential impacts of the project. The pipeline construction that would be undertaken by the applicants associated with the potential implementation of the San Juan option is analyzed at a project level.

As is described on page 3-9 of the Revised Draft EIR, a secondary initial surface water supply could be made available by PCWA if the Sacramento River diversion has not begun delivery of water before additional supplies are required. Under the San Juan option, a new pipeline extending from the San Juan/Sacramento Suburban cooperative transmission pipeline that currently terminates in Antelope Road near Walerga Road would be constructed westerly along Antelope Road to Watt Avenue and then north to the Specific Plan area. The supply could similarly be conveyed in a pipeline to be constructed in PFE Road from Cook Riolo Road to Watt Avenue and northerly to the Specific Plan area. To deliver this secondary initial surface water supply, improvements would be required at the San Juan Water District’s Folsom Lake diversion facility and water treatment plant. However, this Revised Draft EIR assesses only the water transmission facilities that might be constructed by project proponents. Evaluation of any

changes to San Juan Water District's present facilities would be handled separately by PCWA, San Juan Water District, and the Bureau of Reclamation, if future consideration is given to this option. The project does not rely on this secondary initial surface water supply and it is included in the Revised Draft EIR only as a possible option in the event it could be perfected in a timely manner. The project assumes initial water service from PCWA through its American River Pump Station, conveyed and treated at the existing Foothill Water Treatment Plant, and delivered through PCWA's existing transmission pipelines, and the City of Roseville system under an existing agreement with the City of Roseville. In the event the initial water supply system's capacity could be exceeded prior to the completion of the Sacramento River diversion, Mitigation Measures 4.11.7-1a through 4.11.7-1i would limit development within the project area until the additional water becomes available.

The City also states that the Revised Draft EIR is "silent" on potential aquatic impacts related to increased American River diversions. This is not correct. The document contains extensive analysis of aquatic impacts related to the proposed secondary initial surface water supply which would be delivered from the American River. Discussion of the secondary initial surface water supply and its effects on aquatic resources begins on page 4.4-130 of the Revised Draft EIR (see the second paragraph under "Initial Surface Water Supply" and is followed by 42 Impact statements and accompanying analysis. Specific attention is directed to the following impact statements: 4.4-35 (riparian vegetation on the lower American River), 4.4-36 (backwater recharge in the lower American River), 4.4-37 (affects on special-status species dependent on lower American River riparian and open water habitats), 4.4-38 (affects on special-status species dependent on lower American River backwater pond/marshes), 4.4-52 (impacts to Folsom Reservoir's warm water fisheries), 4.4-53 (impacts to Folsom Reservoir's coldwater fisheries), 4.4-55 (impacts to fall-run Chinook salmon and steelhead in the lower American River), 4.4-56 (habitat degradation for splittail in the lower American River), 4.4-57 (impacts to American shad in the lower American River), and 4.4-58 (impacts to striped bass in the lower American River).

The City claims that the no backbone water supply exhibits are included for the "San Juan option." This is also not correct. Figure 3-5 shows the two proposed alternative waterline alignments that could be constructed by the applicants in the event the secondary initial surface water supply is utilized. The two alignments were evaluated at a project level consistent with the discussion appearing on page 2-8 of the Revised Draft EIR. As described on page 2-8, programmatic analysis occurs only within the SPA and where construction of proposed off-site improvements will be under the control of an agency other than Placer County. In the latter case, separate environmental analysis is being undertaken, or will be undertaken by that agency, upon final project definition.

In summary, as described above and in the second paragraph appearing on page 3-9 of the Revised Draft EIR, the Revised Draft EIR assesses only water transmission facilities that might be constructed by the project proponents. Evaluation of any changes to the San Juan Water District's present facilities (including a full CEQA/NEPA assessment) would be handled separately by PCWA, San Juan Water District and the Bureau of Reclamation, similar to the ongoing process for the Sacramento River water diversion. Further, as described above, it is incorrect that aquatic impacts related to American River diversions were not assessed. Aquatic impacts related to American River water diversions were assessed at a project level. In addition,

all related infrastructure for which a project definition exists was evaluated at a project level and was shown on Revised Draft EIR Figure 3-5. Finally, the project does not rely on the secondary surface water supply and it is included only to describe possible options and facilitate the planning process, in the event the various regulatory steps and pipeline construction could be completed in a timely manner.

Response 29F: The Commenter requests that the utility demand and supply numbers be updated to be consistent with documentation not available at the time the Revised Draft EIR was prepared. Comment noted. The utility demand and supply numbers where relevant to this Final EIR have been updated to be consistent with the Final Master Plans for Wastewater, Water and Recycled Water. The County will ensure that all numbers are consistent in the final documentation for the project and will continue to coordinate with City of Roseville in matters related to public utilities. Also see Response to Comment 7I.

Response 29G: The comment restates information concerning impacts contained in the Revised Draft EIR. No response is necessary.

Response 29H: As requested by the Commenter, Figure 10 appearing at the end of this section details the intersection improvements at the intersection of Fiddymont/Walerga Road and Baseline Road. None of the existing structures would be affected by the proposed improvements; however, existing roadway-related curb, gutter, sidewalk, retaining walls and landscaping would require modification. This improvement and other improvements along Baseline Road were anticipated and are covered by the relevant impact statements and subject to the mitigation measures proposed in the Revised Draft EIR. Three corners of the intersection are already built out and the northwest corner has a verified wetland delineation showing no wetlands or waters of the U.S. However, based on a recent visual field inspection, there could be about 0.06 acre of “roadside ditch” (i.e., 675’ x 4’) that may be considered “jurisdictional” under Section 404 of the Clean Water Act. If the area is “jurisdictional, it would be subject to the “no net loss” provisions of Mitigation Measure 4.4-1. Although Baseline Road was inspected for cultural resources, between the Sutter County line and Walerga Road, improvements along Fiddymont Road north of Baseline or on the south side of Baseline east of Walerga (where a visual inspection was not performed) would be subject to the provisions of Mitigation Measure 4.6-14.

Response 29I: The Commenter wants discussion of TSM expanded to include specific goals, requirements and implementation measures for TSM plan. The County is uncertain how meaningful a detailed TSM plan would be at this stage in the planning process. The statement on page 3-22 is in the “project description” and is describing Specific Plan content, not EIR mitigation, and reads as follows: “The Specific Plan also states that a Transportation System Management (TSM) plan will be prepared and adopted for the Specific Plan area for each group of projects at the time of building permit issuance. A TSM plan for the Specific Plan area may include ridesharing/carpooling/vanpooling, preferred parking for carpooling, preferred transit access, transit use incentives, and telecommuting/satellite work centers.”

As can be seen, the proposal is to prepare an individual TSM plan for each “group of projects” at the time of building permit issuance. This will allow the specific nature of the proposed uses to

be known and a plan tailored to meet the needs of future employees with some certainty. Such timing would be more meaningful than trying to devise a detailed plan now with limited information. Because this is not a comment on the Revised Draft EIR, but rather the Specific Plan, no further response is required.

Response 29J: Commenter wishes to review the Financing Plan and wants it to clearly identify the timing for Baseline Road widening. Comment noted. See Responses to Comments 15D and 24B. Triggers (timing) for the widening and construction of improvements to Baseline Road are found on page IV-2 of the Financing Plan. Baseline Road between Walerga Road and the Sutter County line will be constructed to 4 lanes as part of core infrastructure at the outset of development. The timing of roadway expansion to 6 lanes will be detailed in the Development Agreement.

Response 29K: Commenter is concerned about differences between the analysis and City's current CIP. The different levels of service are due to differences in development assumptions between the Cumulative No Project scenario in the Revised Draft EIR and Roseville's 2020 CIP analysis. The Cumulative No Project scenario has no development in the Placer Vineyards project area. Roseville's 2020 CIP analysis assumes that about 7,800 dwelling units and some non-residential uses would be developed on the Placer Vineyards project site.

Response 29L: Commenter requests an additional mitigation measure concerning road striping at Harding Boulevard/Will Road. The suggested mitigation measure would be feasible. However, an analysis of this measure shows that it would not improve traffic operations at this intersection under the Cumulative Plus Project conditions. Therefore, it would not be effective, and is not added to the Revised Draft EIR.

Response 29M: The County declines to adopt the commenter's suggested revisions to Mitigation Measure 4.7-14c of the Revised Draft EIR with respect to the Project's participation toward the City of Roseville's Intelligent Transportation System/Transportation Demand Management (ITS/TDM) program (See Revised Draft EIR, page 4.7-78). As set forth in Mitigation Measure 4.7-14c, the Project developers would participate in the City of Roseville ITS/TDM program on a fair share basis as determined by the County in consultation with the City of Roseville.

CEQA case law makes clear that “[w]hen future traffic congestion will result from the cumulative impact of several projects, cumulative traffic mitigation measures for a single project (that is one of several projects) may be deemed sufficient if those measures are based on a reasonable plan of actual mitigation that the relevant agency commits itself to implementing (see *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1187 (*Anderson First*)). “A single project’s contribution to a cumulative impact is deemed less than significant if the project is required to implement or fund its ‘fair share’ of a mitigation measure designed to alleviate the cumulative impact” (*Anderson First*, at page 1188; CEQA Guidelines, Section 15130, subd. (a)(3)). Courts have found that fee-based mitigation programs for cumulative traffic impacts, based on fair-share infrastructure contributions by individual projects, are adequate mitigation measures under CEQA (*Anderson First*).

Therefore, Mitigation Measure 4.7-14c is an adequate mitigation measure under CEQA. The Project would fund its fair share of the City's ITS/TDM program, in order to mitigate its fair share of the cumulative impact to City roadways. The County therefore disagrees with the commenter that the Project should fund the entire capital outlay cost for the ITS/TDM program, as CEQA does not require the Project to contribute more than its fair share (see CEQA Guidelines, Section 15130, subd. (a)(3)).

Response 29N: The commenter suggests that, considering the future level of projected Baseline Road traffic, the Revised Draft EIR should identify a bike undercrossing of Baseline Road as an additional mitigation measure. An addition has been made by the applicants to Specific Plan Policy 5.23 to include a bicycle crossing of Baseline Road in the eastern portion of the project area to connect bicycle trails within the Specific Plan area with bicycle trails proposed in the Sierra Vista Specific Plan. This crossing could take the form of either an overcrossing or undercrossing, to be determined by the Project applicants in consultation with the County. The County will work with the City to ensure that the bicycle/pedestrian crossing of Baseline Road connects to similar paths north of Baseline Road (in the City of Roseville), and to determine the appropriate type of crossing.

Response 29O: Commenter requests the addition of clarifying language to the Executive Summary. The sixth bulleted paragraph on page 1-3 of the Executive Summary is hereby modified as follows:

- Section 4.11 (Public Services/Infrastructure) has been updated to reflect current service configurations and Specific Plan proposals. Most references to the previous fiscal analysis have been removed, and recently proposed service level standards prepared by the County for many of the services have been incorporated in the section. Because recent studies have shown the availability of treatment capacity at the Dry Creek Wastewater Treatment Plant operated by the City of Roseville on behalf of a Joint Powers Authority consisting of the City of Roseville, Placer County, and the South Placer Municipal Utility District, the use of the Dry Creek WWTP for all project-generated effluent is now identified as the preferred approach for wastewater treatment and disposal (Revised Draft EIR Appendix R). The previously identified preferred approach, by which effluent from all but the eastern-most portion of the project area would go to the Sacramento Regional County Sanitation District facility in Freeport, is now no longer the preferred approach, but is still analyzed in order to keep that option open. An updated SB-610 water analysis has been received from Placer County Water Agency. This fact is reported and the analysis modified accordingly. A section (4.11.8) has also been added to this Revised Draft EIR that consolidates discussion and analysis related to a recycled water supply.

Response 29P: The commenter disagrees with the conclusion for Impact 4.11.8-2 regarding recycled water as it appears in the Executive Summary. See Response 29Z for a response to commenter's concern.

Response 29Q: The commenter requests the revision of wastewater flow calculations provided by RMC. The referenced 19.3 MGD is descriptive of the RMC Technical Memorandum. To change the calculation, as requested, would be a mischaracterization of the content of the referenced Technical Memorandum. The subsequent paragraph appearing in the Revised Draft EIR explains the discrepancy between RMC's work and the proposed project. No changes are warranted.

Response 29R: Commenter questions accuracy of the first paragraph on Revised Draft EIR page 4.11-43 related to the reason for differences in wastewater generation rates. Comment noted. The subject paragraph is hereby modified as follows:

A comparison of wastewater generation rates used to calculate transmission flows and the rates used to calculate treatment plant flows show that transmission rates exceed the treatment plant rates. According to the Sewer Master Plan, the difference in generation rates results from the fact that treatment plants are rated for average dry weather flows (ADWF) while transmission systems must transmit peak wet weather flows ~~attenuation of peak flows that occurs as wastewater flows from the outer reaches of the transmission system to the treatment plant.~~

This change does not raise a new environmental impact or increase the severity of one. No further response is required.

Response 29S: The commenter correctly points out a discrepancy in reported wastewater flows. The in-text reference to 2,980,000 gallons is a reference to a previous version of the Sewer Master Plan (January 2006). Information appearing on Table 4.11-6 and all Revised Draft EIR analysis was subsequently updated to reflect the March 2006 version of the Sewer Master Plan. The first paragraph appearing under Impact 4.11.6-2 is hereby amended as follows:

Table 4.11-6 shows anticipated wastewater flows for the Specific Plan area. According to the Sewer Master Plan, the project will generate an Average Dry Weather Treatment Plant Flow of 2,790,000 ~~2,980,000~~ gallons per day (ADWF) at buildout.

This change does not raise a new environmental impact or increase the severity of one. No further response is required.

Response 29T: The commenter references wastewater flow calculations provided by RMC. As noted under Response 29Q, because RMC's work is referenced, 19.3 is the correct number. No changes in the Revised Draft EIR are warranted.

The commenter also states that recent work by RMC, Technical Memorandum 4b, (not available at the time of Revised Draft EIR publication) reports that the DCWWTP can be expanded to 21 MGD in the future. According to Technical Memorandum 4b, this is derived by rounding plant capacity up to the nearest 3 MGD increment. Because RMC assumes future flows to DCWWTP of 19.3 MGD, 21 MGD is used by RMC for plant sizing and evaluation. On page 4.11-50 of the Revised Draft EIR it is reported that total flows to the DCWWTP would be approximately 18.2

MGD with the proposed project. Projected flows are, therefore, well within the limits established by RMC's most recent work and no new significant environmental issues not already evaluated in the Revised Draft EIR have been identified. Revised Draft EIR Appendix R is amended to add RMC Technical Memorandum 4b, dated March 28, 2006.

Response 29U: The commenter references the 18.2 MGD wastewater flow calculation. See Response 29Q.

Response 29V: The commenter references the 19.3 MGD wastewater flow calculation provided by RMC. See Response 29Q.

Response 29W: The commenter references the 19.3 MGD wastewater flow calculation provided by RMC. See Response 29Q.

Response 29X: The commenter notes that RWQCB Order No.97-147 has been updated with Amendment 2. The referenced paragraph under "STATE" on Revised Draft EIR page 4.11-89 is hereby amended as follows:

The RWQCB and the DHS have primary oversight responsibility for implementation of recycled water projects in California. The treatment plants process wastewater in accordance with the RWQCB standards and permit requirements under the NPDES for discharge of treated wastewater and that meet the requirements for "full unrestricted reuse" as determined by the DHS. On June 20, 1997 the Central Valley RWQCB adopted a Master Water Reclamation Permit (Order No. 97-147) to permit the City's existing recycled water distribution system. The permit has been twice amended and the City currently operates under "Amendment 2." This permit outlines specific prohibitions on the use of recycled water in the city and place stringent water quality criteria, as well as treatment and disinfectant standards for recycled water use.

Response 29Y: Commenter requests that Revised Draft EIR text be updated to reflect the "final" Recycled Water Master Plan. Since the Revised Draft EIR was published, the applicants have completed a Recycled Water Master Plan for the Specific Plan as well as the Blueprint Alternative. Both documents, dated August 2006, are available for review at the Placer County Community Development Resource Agency, 3091 County Center Drive Auburn, CA 95603.

The discussion in the Revised Draft EIR was based on the best available information at the time. The Revised Draft EIR reports that the average day demand in July for recycled water would be 3.44 MGD while average day project wastewater flows would be 2.79 MGD (page 4.11-92). Because the City of Roseville will supply no more recycled water than is received, it is reported in the Revised Draft EIR that available recycled water will be less than project demand. Any shortfall would need to be made up from other sources such as the potable water supply. In the event wastewater from the western portion of the Specific Plan area is directed to the SRCSD, the need for potable water for landscape areas would be even greater, because Roseville would reduce recycled water supply to a level consistent with wastewater received at the DCWWTP. Because of the uncertainties surrounding the recycled water supply, including the absence of a

plan, the potential shortfall in recycled water was reported as a potentially significant and unavoidable impact (Impact 4.11.8-2). Assuming the entire Specific Plan area was served by the DCWWTP, the Revised Draft EIR reports that the potentially significant and unavoidable impacts related to this issue would be reduced to less than significant because a full allotment of recycled water would be received and any shortfall would be made up through the available potable water supply.

None of the above conclusions change as a result of information contained in the August 2006 Recycled Water Master Plans. Recycled water would continue to be in short supply if wastewater was directed to SRCSD; however, a plan has now been developed to show how recycled water would be supplied, assuming wastewater is treated at the DCWWTP. Some of the quantification has been refined. For example, wastewater flows in the project Recycled Water Master Plan are rounded to 2.8 MGD versus 2.79 MGD and the peak day supply shortfall is calculated to be .7 MGD based on a July day recycled water demand of 3.5 MGD (page 3-11) versus 3.44 MGD. These are insignificant housekeeping matters that have no effect on EIR conclusions or other matters of concern under CEQA.

The Recycled Water Master Plans now describe two demand scenarios. The Revised Draft EIR and the above paragraph report the “base case.” A semi-aggressive case is also reported in the Specific Plan Recycled Water Master Plan that would require 4.7 MGD to meet July day recycled water demand. Although the semi-aggressive approach has not yet been selected, it is important to understand that the higher use of recycled water under the semi-aggressive approach would reduce overall potable water demand. Further, it would not impact minimum in-stream requirements reported in the Revised Draft EIR for the DCWWTP. As described above, the City of Roseville's policy is to guarantee a recycled water supply no greater than the average dry weather wastewater flow sent to Roseville treatment plants. Therefore, regardless of the actual volume, as long as supply (including supplemental potable supply) meets demand, there would not be any overall impacts to Roseville's supply/demand analysis. A review of Roseville's Market Assessment Technical Memorandum (RMC) (see Revised Draft EIR Appendix R) indicates that Roseville intends to meet its in-stream flow requirements, and other demands including the Sacramento County demands, with supply from existing and future wastewater customers that will not be using recycled water.

The recycled water supplied by the City of Roseville is assumed too not exceed 2.8 MGD for the proposed Specific Plan or 3.9 MGD for the Blueprint Alternative, with the balance coming from another source, such as the potable water supply. However, both Recycled Water Master Plans contain the following information on page 3-11:

Though the City bases the amount of recycled water supply on the ADWF generated and delivered by a project, the City's (sic) recognizes that additional recycled water will likely be available. Roseville's Recycled Water Market Assessment Tech Memorandum (November 2005) discusses potential supplies and demands. There is additional recycled water available discussed in the TM, but the City cannot commit to 100 percent of the available supply at this time due to operational restrictions.

In the event the excess recycled water is not made available, the project proponents intend to meet irrigation demand with potable water. As described above, this increases the need for potable water for the proposed Specific Plan by 0.7 MGD in a maximum day, or 112 AFA (Specific Plan Recycled Water Master Plan, page 3-12, Figure 3-2). For the Blueprint Alternative this increases the need for potable water by 0.2 MGD on a maximum day, or 19 AFA (Blueprint Alternative Recycled Water Master Plan, page 3-12, Figure 3-2). For the semi-aggressive approach, 438 AFA of potable water would be required annually to meet peak day demands under the Specific Plan and 285 AFA under the Blueprint Alternative. For analytical purposes, however, the “base demand” 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.

These potential additional demands on the potable water supply 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 under the semi-aggressive approach (438 AFA) when combined with other project demand (11,500 AFA + 438 = 11,938 AFA) is well within the potential diversion assessed in the Revised Draft EIR. For the Blueprint Alternative, potable water use could increase an even more insignificant amount from 14,453 AFA to 14,738 AFA. For additional water supply information, see Response to Comment 15N and Final EIR Appendix FEIR-A.

The Recycled Water Master Plans also provide additional information concerning potential recycled water infrastructure needs. Revised Draft EIR Figure 3-18 is hereby revised to reflect the changes. Although not shown on Figure 3-18, the off-site recycled water line “B” remains a long-term option for recycled water service as Western Placer County builds out; however, the current Recycled Water Master Plans assume service from the DCWWTP. As shown on Figure 3-18 and Recycled Water Master Plans Figure 4-1, a 24-inch supply line will now be extended west from the point of connection at Walerga Road along the south side of Dry Creek following the same alignment as the sewer force main shown on Revised Draft EIR Figure 3-7. The supply line will cross Dry Creek at the same location shown on Figure 3-7 and in the same manner (jack and bore construction) as is described on Revised Draft EIR page 3-10. This corridor and stream crossing were fully assessed for biological and cultural resource effects, as described in Chapters 4.4 and 4.6 of the Revised Draft EIR (e.g., Impacts 4.4-27, 4.4-30 and 4.6-11). No effects related to the recycled waterline installation have been identified that were not previously assessed in the Revised Draft EIR.

In addition to recycled waterlines, Figure 3-18 shows two storage tank and booster pump locations. The Revised Draft EIR described a single tank location at 16th Street and Dyer Lane. A second site has now been identified on Dyer Lane east of Watt Avenue. The Dyer Lane site east of Watt Avenue is recommended in the Recycled Water Master Plans “...due to its lower present worth cost and higher operational flexibility” (page 4-6). However, the 16th Street/Dyer Lane site has not been eliminated from consideration at this time. The proposed tanks would hold 3.5 MG under the base case and 4.7 MG under the semi-aggressive approach. For the Blueprint Alternative, the tanks would either hold 4.1 MG under the base case or 5.4 MG under

the semi-aggressive approach. Assuming a 5.4 MG tank, the tank would be 160 feet in diameter and approximately 40 feet in height. In order to maintain consistency with structure height requirements under the Specific Plan, the tank could not exceed an above-ground height of 36 feet.

The Revised Draft EIR assumed that the tank would not exceed 150 feet in diameter or 30 feet in height. However the dimensional differences described above are minor and would not alter conclusions contained in the Revised Draft EIR. Impact 4.2-3 discusses water storage tanks from a visual perspective and concludes that the tanks would not be obtrusive because they would not exceed the height of other structures allowed under the Specific Plan. Even though the tank could be approximately 6 feet greater in height, it would be constructed to conform to the height restriction contained in the Specific Plan. From a land use compatibility perspective, the new tank site (Dyer Lane east of Watt Avenue) is bounded on three sides by open space area and the fourth side is adjacent to Dyer Lane. The site was formerly shown for High Density Residential use, which will be entirely eliminated by the proposal. Therefore any potential land use compatibility impacts are avoided. Any noise concerns associated with the proposed booster pumps are mitigated by the open space buffers, Dyer Lane and Revised Draft EIR Mitigation Measure 4.9-2.

Response 29Z: Commenter suggests that recycled water impacts under the DCWWTP scenario cannot be less than significant because no mitigation is proposed. Comment noted. The referenced paragraph on page 4.11-93 of the Revised Draft EIR is amended to read as follows:

No mitigation measures are available to offset the potential lack of supply, with the exception of a change in the project description to eliminate the potential to bifurcate wastewater treatment. This remains a *potentially significant and unavoidable impact* under a scenario in which the project sends effluent from its western area to SRCSD, although it would be ~~mitigated to a less than significant level~~ under a scenario in which all effluent is sent to the DCWWTP.

With regard to the issue of level of impact, it does not change, neither the County nor the Specific Plan assume that there will be a 100% supply of recycled water for all public landscaping. The threshold for significance used was whether the project would take advantage of potentially available recycled water. In other words if recycled water could be made available to the project from DCWWTP or the Pleasant Grove WWTP through transmission of effluent to the Roseville system, but instead, the applicants chose to send effluent to the SRWWTP where recycled water would not be available, this would be a significant impact. If the project uses all recycled water that is potentially available to it through the Roseville system, the impact is less than significant.

Response 29AA: The project water supply assumes recycled water for irrigation of parks and landscape medians. The City of Roseville has indicated they can only guarantee to supply a quantity of recycled water equivalent to the amount of wastewater delivered from the project. However, if excess recycled water is available the City will deliver it to the project. Under the base case for the proposed Specific Plan, the maximum day recycled water demand would exceed the amount of wastewater delivered by 0.7 mgd. This amount will be made up by potable

water provided by PCWA. This is well within the capability of PCWA's water supplies. Also see Response to Comment 29Y.

Relative to groundwater the Revised Draft EIR contained information from PCWA's Western Placer Groundwater Study. The Study concludes the sustainable yield of Western Placer County can be conservatively estimated at 95,000 acre-feet on a long term average annual basis. Current withdrawals are approximately 89,000 acre-feet annually. The commenter is also referred to Responses to Comments 15K, 15N, 15DD and 33L as well as the IWRP located in Final EIR Appendix FEIR-A.

Response 29BB: Commenter is concerned about inconsistencies between potable water supply and demand analysis and the recycled water supply and demand analysis. City states that Recycled Water Master Plan is not yet complete. The August 2006 Recycled Water Master Plans are now available and has been forwarded to the City of Roseville for its review. See Response to Comment 29Y.

Response 29CC: Commenter states that the recycled water information in the Revised Draft EIR has been "superseded." See Response to Comment 29Y.

Response 29DD: The comment suggests that a City of Roseville pipeline in PFE Road could be used for water delivery to the project. There are no current plans under any of the various options analyzed to use a City of Roseville pipeline in PFE Road for water delivery. A possible water supply pipeline is proposed to be constructed by the applicants in PFE Road and is shown on Figure 3-5 as "Water Supply Option A" (San Juan Supply Option).

The current delivery point at the intersection of Fiddymment/Walerga Rd and Baseline Rd for the water wheeled through the Roseville system will be the point where PCWA will access the initial supply for the project. Only in the event that the San Juan Supply Option is pursued would an alternative water delivery routing be utilized. If this is pursued Roseville will be party to any such agreement.

Response 29EE: Commenter requests that Revised Draft EIR Figure 3-5 show the metering station at Fiddymment/Walerga Roads and Baseline Road. Figure 3-5 is hereby modified and reprinted in Section Four of this Final EIR.

Response 29FF: Commenter again requests that metering station be shown. See Response to Comment 29EE.

Response 29GG: The City comments that there are inconsistencies between the Revised Draft EIR and the Blueprint Specific Plan regarding improved parkland acreage. The commenter is incorrectly comparing the Revised Draft EIR's analysis of the proposed project with the Blueprint Specific Plan. To clarify, the Revised Draft EIR analyzes the proposed Specific Plan. The Blueprint Specific Plan is analyzed as an alternative to the proposed project in Chapter 6 of the Revised Draft EIR.

Page 2-4 of the Revised Draft EIR describes changes that have been made to the proposed Specific Plan in response to concerns raised during the circulation of the Revised Draft EIR. This page does not pertain to the Blueprint Specific Plan. As discussed on page 4.11-159 of the Revised Draft EIR, based on an estimated buildout population of 34,762 the proposed project is required by county standards to provide a minimum of 174 acres of improved parkland. The proposed project will provide 217 acres of improved parkland thereby exceeding county standards.

As shown on Table 6-9 (Revised Draft EIR, page 6-42), under the Blueprint Alternative scenario approximately 260.5 acres of community and neighborhood park facilities would be provided. This park acreage also exceeds that required to meet county standards (247 acres).

The Land Use Summary Table referred to as Figure 3-2 by the commenter summarizes the proposed land uses for the proposed project not the Blueprint Alternative. The proposed Specific Plan will meet the minimum parkland requirements; therefore, the impact on City of Roseville park facilities will be less than significant as stated on page 4.11-160 of the Revised Draft EIR.

Response 29HH: Commenter notes places in the Revised Draft EIR where 217 acres is referenced. Comment acknowledged. Refer to Response 29GG.

Response 29II: The commenter correctly states that the Placer Vineyards Specific Plan project proposes two General Plan amendments which change policies dealing with activity-oriented recreation programs in connection with an approved specific plan. In addition, the commenter suggests the County eliminate policies 5A.16 and 5.A.25 and become involved in providing recreations programs (Countywide) in light of the shifts in developing urban densities. The current General Plan policies provide direction for County recreation facilities to be built, but limits the County's involvement in active recreation programs. The Specific Plan is proposing an urban community with urban levels of services for recreation (both facilities and programs). The amendments proposed with the Placer Vineyards Specific Plan will allow the County to engage in providing both recreation facilities and programs for this urban area; however the County does not agree that the same urban levels of service for active recreation programs are appropriate for other rural Placer County communities. Furthermore, the Specific Plan does not provide policies directing development in other areas of the County.

Response 29JJ: The City comments that there are inconsistencies in population numbers and improved parkland requirements. This is a comment on the Specific Plan not the Revised Draft EIR. The Revised Draft EIR consistently states that the estimated Plan area population at buildout will be 34,762 and based on this number the Revised Draft EIR also consistently states the improved parkland requirement is 217 acres. No changes to the Revised Draft EIR are warranted.

Response 29KK: This is comment on the Specific Plan not the Revised Draft EIR. No changes to the Revised Draft EIR are warranted.

Response 29LL: This is comment on the Specific Plan not the Revised Draft EIR. No changes to the Revised Draft EIR are warranted.

Response 29MM: Mitigation Measure 4.11.12-1b requires the completion of one or more branch libraries within the Specific Plan area in order to maintain county library service standards and comply with the *Auburn-Placer County Library Long-Range Plan*. One of these libraries may be located within the Town Center as stated in Specific Plan Goal 6.18 and Policy 6.27; however, the final location(s) of library facilities has not yet been determined.

Response 29NN: This is a comment on the Blueprint Specific Plan not the Revised Draft EIR. The Revised Draft EIR consistently states that the proposed project will provide 217 acres of active parkland and 714 acres of open space for a total of 931 acres. No changes to the Revised Draft EIR are warranted.

Response 2900: This is a comment on the Blueprint Specific Plan not the Revised Draft EIR. The Revised Draft EIR concludes on pages 4.11-159 and 4.11-160 that with implementation of Mitigation Measure 4.11.13-1 the proposed project will provide adequate parkland in compliance with county standards. No changes to the Revised Draft EIR are warranted.

Response 29PP: This is a comment on the Blueprint Specific Plan not the Revised Draft EIR. No changes to the Revised Draft EIR are warranted.

Response 29QQ: This is a comment on the Blueprint Specific Plan not the Revised Draft EIR. No changes to the Revised Draft EIR are warranted.

Response 29RR: This is a comment on the Blueprint Specific Plan not the Revised Draft EIR. No changes to the Revised Draft EIR are warranted.

Response 29SS: This is a comment on the Blueprint Specific Plan not the Revised Draft EIR. No changes to the Revised Draft EIR are warranted.

Response 29TT: The commenter notes that the Revised Draft EIR, on page 3-19, states that "a village green and community gathering area to accommodate civic uses such as a library facility, recreation center, and government office" and further notes that there is no strong statement that each of these them will be included. The commenter goes on to observe that a library facility must be provided somewhere in the plan.

The Revised Draft EIR notes that the Specific Plan provides space for each of these facilities to be constructed in the Town Center. The Specific Plan also identifies possible programming for these and funding for other public facilities (Section 8.32 and 9.4.3). The plan makes an even more specific commitment to the construction of a library in the Town Center; see Response 29MM. The Revised Draft EIR, in Mitigation Measures 4.11.12a, b and c, further defines how this library shall be funded and its construction ensured. This is a comment on the Blueprint Specific Plan not the Revised Draft EIR. No changes to the Revised Draft EIR are warranted.

Response 29UU: The City comments that the timing of fire station construction is inconsistent between the Specific Plan and the Revised Draft EIR and recommends that the Specific Plan be amended to create consistency.

This is a comment on the Specific Plan not the Revised Draft EIR. Revised Draft EIR Mitigation Measure 4.11.2-2b requires the western fire station to be constructed and equipped prior to issuance of a certificate of occupancy for the first dwelling unit located west of Watt Avenue. However, the Financing Plan (June 30, 2006) has provided more detail than was available at the time the Revised Draft EIR was released. In order to maintain consistency between the Financing Plan, Specific Plan and EIR, Mitigation Measure 4.11.2-2b is modified as follows:

4.11.2-2b *A ~~The~~ western fire station shall be constructed and equipped, at a location approved by the Placer County Fire Department, prior to issuance of a ~~certificate of occupancy~~ building permit for the first dwelling unit located west of Watt Avenue. This first station may initially be located in a temporary building or location; however, a permanent station shall be available for occupancy within 18 months of issuance of the building permit for the first dwelling unit located west of Watt Avenue. The eastern fire station shall be constructed and equipped, at a location approved by the Placer County Fire Department, prior to issuance of a building permit for the 5,000th dwelling unit.*

The above minor modifications deal with a question of timing and do not constitute significant new information within the meaning of CEQA Section 15088.5.

Response 29VV: The City comments on differing ISO ratings. The Specific Plan is currently considered a rural area and must therefore maintain an ISO rating of 8 according to County General Plan policy. As areas within the Specific Plan area are urbanized, they will be required to maintain an ISO rating of 4. Compliance with County General Plan policy and other standards related to fire service will ensure that adequate fire protection services are provided within the Specific Plan area and that the City of Roseville Fire Department will not be adversely affected. No changes to the Revised Draft EIR are warranted.

Response 29WW: Commenter requests information on the financing and timing of construction of Bus Rapid Transit (BRT). The comment is correct that BRT is a regional operation. A BRT facility along Watt Avenue was identified as an important project in the Multi-Corridor Study conducted by Regional Transit in 2000-2001 which led to its inclusion in the 2002 MTP and subsequent 2006 MTP. See Response to Comment 20H. For a discussion of financing of improvements, please see Response to Comment 15D.

Response 29XX: Commenter requests detail about location of BRT lanes. Future right-of-way will be adequate to accommodate BRT, including dedicated lanes. The County and applicant will coordinate with Regional Transit regarding the appropriate location of the lanes. The lanes would be constructed when an operating BRT system exists in the region.

Response 29YY: Commenter asks about number of lanes on Watt Avenue. Figure 5.3 in the Specific Plan calls for a six travel lanes on Watt Avenue plus additional right-of-way for two 12 foot lanes for BRT.

Response 29ZZ: The commenter suggests that Specific Plan Policy 5.12 should be revised to describe the common barriers to access by pedestrians and bicyclists (major arterial roads with more than 4 lanes, soundwalls, cul-de-sacs and private gated communities) and include measures to minimize their impact.

The policy mentioned, Policy 5.12, is a general transportation policy and is one of many policies relating to the limiting or elimination of barriers to pedestrian and bicycle access. These topics are addressed in detail in Chapter VI, Community Design (e.g., Policies 6.37 and 6.42). No change to Policy 5.12 is necessary.

Response 29AAA: The comment letter requests that the plan describe how bicycle access would be provided to the planned Sierra Vista, Curry Creek and Regional University projects. A pedestrian/bicycle crossing over (or under) Baseline Road will be provided in cooperation with the City of Roseville. See Response 29N. Trails within Placer Vineyards will connect to this crossing. The interconnection of trails north of Baseline Road should be the responsibility of the other named projects.

Response 29BBB: The commenter says that Policy 5.14 should describe methods to be used to avoid the use of sound walls and provides as an example that a public street might be used to separate incompatible land uses instead of a sound wall. Policy 5.14 is but one instance within the Specific Plan addressing the use of features other than sound walls to attenuate noise. The County's strong commitment to such means is expressed in Chapter 4, Environmental Resources, (Section 4.10) with policies and details of alternatives to sound walls are required in Chapter 6, Community Design (Section 6.4). No change to Policy 5.14 is necessary.

Response 29CCC: The comment states that "the use of LDR along major arterials should be minimized". Comment noted. The plan does minimize interfaces between low density residential land uses and major roadways.

Response 29DDD: The commenter believes that Item 9 of Policy 5.23 should include one or more figures showing how traffic calming will be used as trails cross major streets. The policy requires such features and they will be further defined as the Specific Plan required Landscape and Park and Recreation Master Plans are developed, see Policies 6.1 and 7.2. This is not a comment on the Revised Draft EIR and no further response is required.

Response 29EEE: Commenter requests additional information on dial-a-ride services. Bus routes (both fixed and dial-a-ride) will be selected by the service provider as the project and other projects in the vicinity develop. Dial-a-ride services are not discussed on page 4.7-30, and conflicting statements regarding dial-a-ride service were not found elsewhere in the Revised Draft EIR.

Response 29FFF: Commenter questions what transit services, purchases, and facilities will be funded by CSA. Please see Response to Comment 15TT.

Response 29GGG: The comment letter suggests that the "complete impacts to PCT" may not be addressed in this Revised Draft EIR. As an example the commenter questions "if a new maintenance facility is to be created in this area, how will an extension of the main natural gas line to the new maintenance facility be provided for fueling" (sic)?

It is not clear from the comment what impacts may be of concern to the commenter. If the hypothetical impact is to be from construction of either a bus maintenance facility or a natural gas line extension these impacts would be addressed through the Subsequent Conformity Review Process described on pages 2-14 and 2-15 of the Revised Draft EIR. If, on the other hand, the commenter is concerned with the funding of improvements such as a gas main extension this topic should be addressed in funding discussions between PCT, the County and the applicants.

Response 29HHH: Commenter questions source of funding for BRT. The proposed County Service Area could fund the project's fair share of BRT; however, the actual funding source is still to be determined. Until a decision is made to build and operate BRT in Placer County, it is not possible to establish the project's fair share with any degree of certainty. If it is built, all projects that benefit would contribute, including Placer Vineyards.

Response 29III: The commenter requests that a proposed transit map be provided designating which corners will have planned bus shelters and addressing how buses will stop at each corner. This is a comment on the Specific Plan. A map of possible transit routes is included in the Specific Plan as Figure 5.5. Transit routes are also discussed in detail in the Revised Draft EIR at topic 4.7-10. The Specific Plan transit route diagram will be expanded on and implemented as the Placer Vineyards Specific Plan area develops. The exact location of bus shelters and bus shelter pads will be established in coordination with PCT and in advance of the completion of construction drawings for the improvement of major Specific Plan streets, as required by current Specific Plan Policy 5.19.

Response 29JJJ: Commenter wishes to know who will install and maintain bus shelters. Bus shelters will be constructed, or installed, by the project developer(s) and maintained by the CSA.

Response KKK: Commenter requests detail on transit operations. The information requested by the commenter will be determined by the transit service providers, and will change overtime as the project and surrounding development build out.

Response 29LLL: The commenter suggests that the park and ride lot be moved to Baseline and Watt Avenue further suggesting that this would be a way to better serve the express bus run to Sacramento. The Specific Plan includes park and ride lots in the Town Center and at a transit center at the East Village Center. It is not clear which of these lots the commenter would move to the specified intersection. The park and ride lots have been planned at the locations shown as they are on or adjacent to planned major transit routes and adjacent to the commercial centers of the plan. By being adjacent to the Town Center and East Village Center users of the park and ride lots can avail themselves of convenient retail opportunities and assist in bringing vitality to these centers of community activity. The lots might also be available for shared parking uses in hours away from major commute times. The commenter also observes that few people use park

and ride lots for fixed route transit trips. The observation concerning park and ride lot use is noted.

Response 29MMM: The commenter, in a continuation of Comment 29LLL, goes on to ask how many spaces are needed for the park and ride lot and who will provide and maintain the lot. The Specific Plan, in Policy 5.20, states that a minimum of 193 park and ride spaces will be provided split between the Town Center and East Village Center transit center lots. This policy also establishes a minimum of 50 of these spaces be provided at the Town Center and that other smaller park and ride lots be established as shared parking facilities elsewhere in the plan. The Revised Draft EIR expands on this policy and specifies timing of park and ride development in Mitigation Measure 4.8-3f. The commenter further observes that video surveillance should be considered at the park and ride lot. The observation concerning the use of video security for the park and ride lots is noted.

Response 29NNN: Commenter requests that the costs and impact of adding future transfer points be evaluated. Comment noted. The routes and transfer points for future transit will be determined by the service providers. The County will encourage those service providers to coordinate with each other, including the City of Roseville.

Response 29000: Commenter requests consideration of future light rail station at Antelope and Roseville Road. Mitigation Measure 4.7-10a in the Revised Draft EIR calls for the establishment of a CSA to fund the cost of transit services, including a fixed route bus route connecting the Specific Plan to the Watt/I-80 light rail station. A transit connection to this existing station instead of a future Antelope station was included for the following reasons:

- The Watt/I-80 station would be closer to the Specific Plan than the Antelope station.
- The fixed route service along Watt Avenue would connect the Specific Plan to more employment and retail destinations, than would a route to an Antelope station.
- A route along Watt Avenue has been proposed as part of PCTPA's Short Range Transit Plan and on-going Long-Range Transit Master Plan.

Response 29PPP: Commenter requests an analysis of vehicle miles traveled. Page 4.7-56 discusses transit. The comment does not indicate how an analysis of vehicle miles traveled would inform the transit impact. For the readers' information, estimated vehicle miles traveled per household under the proposed project and Blueprint alternative are reported on page 6-91 of the Revised Draft EIR (52.5 miles per household under the proposed project, and 23.9 miles per household under the Blueprint alternative).

Response 29QQQ: The comment letter requests the consideration of an additional mitigation measure requiring the project to create transit-friendly development by "implementing pedestrian and transit oriented developments, design, density and diversity" (sic). It observes that effective design and placemaking is just as important as the designation of a corridor for transit, walking or bicycling.

The County is unclear how this would work as a mitigation measure. The development of the Specific Plan and its policies regarding its implementation is firmly based on the principles expressed in this request. In particular see the Executive Summary, page ii-1, Chapter I, Introduction, page 1-1, Chapter III, Land Use, Goals 3.1 and 3.2, Chapter IV, Transportation and Circulation, Goals 5.1 and 5.4, Roadway Design Guidelines, page 5-6, and Chapter VI, Section 6.4, Neighborhood Design. These policies are included and addressed in the Revised Draft EIR and no additional mitigation measure is needed.

Response 29RRR: The commenter request that a mitigation measure be added requiring an increase in non-residential densities to Floor Area Ratios (FARs) of between 0.5 and 1.0 and residential densities to approximately 20 units per acre or more at specific nodes along major transit corridors.

FARs of up to 2.0 and residential densities of up to 35 units per acre are currently allowed in the Town Center and Commercial Mixed Use land use designations which are located at major transit nodes in the plan. No additional mitigation measure is needed to facilitate the proposed increase in allowable intensities.

Response 29SSS: The comment asks that the plan consider other design methods, such as limited or priced parking at major nodes, to encourage use of alternative means of transportation, such as bicycling or transit. Comment noted. Methods such as the use of shared parking and Town Center / Village Center designs are included in the Specific Plan. On-street parking in the Town Center is also to count against parking requirements. These measures are means similar to those suggested to limit vehicular use and encourage walking, bicycling or transit.

Response 29TTT: Commenter wants a mitigation measure requiring bike lockers and showers. This would not reduce the demand for bicycle facilities, which is the subject of Impact 4.7-11 on page 4.7-57. Furthermore, as discussed on page 4.7-57, the proposed project provides adequate bicycle facilities, so the impact is less than significant.

The requested mitigation measure is also probably unlawful pursuant to Health and Safety Code Section 40717.9, which prohibits all public agencies in California from imposing "employee trip reduction programs" (e.g., requiring space for bike racks, installing showers for employees who walk or ride bicycles to work, requiring the posting of transit or rideshare information for the benefit of employees) except in extremely limited circumstances (See Remy et al., Guide to the California Environmental Quality Act (1999) pages 981 et seq.). For CEQA purposes, the consequence of Section 40717.9 is that it eliminates employee trip reduction programs as one of the types of mitigation that cities and counties can impose under CEQA for impacts on air quality and transportation facilities.

Response 29UUU: Commenter is concerned about safety perceptions of bike trails on major arterials. On thoroughfares and arterials, meandering lanes, which would be used by bicyclists and pedestrians, would be separated from vehicle traffic by a median. On street bike lanes would also be provided on these roads (see Figure 5.3 in the Specific Plan).

Response 29VVV: The comment letter asks what criteria will be used to evaluate exceptions to designated access points along thoroughfare roads. Specifically it asks how the term "benefit overall traffic flows" will be evaluated. As an example the commenter notes that a large retail center can show a benefit to overall traffic by allowing multiple points of access to the site if traffic comes directly from an adjacent travel lane. The commenter does not identify in what context in either the Specific Plan or Revised Draft EIR he finds the term "benefit overall traffic analysis". These words do appear in Specific Plan Policy 5.4, Street Section Design; however, in Policy 5.4 the term is used to provide the County with a means to potentially add additional road connections to thoroughfares and override the limitations on such connections described in the policy and shown in Specific Plan Figure 5.2. The commenter, in using the term "exceptions to designated access points" and by citing the example of multiple access points to retail sites, appears to address driveway access as opposed to an increase in the number of road connections to thoroughfares. If one assumes that the comment does refer to the following words in Policy 5.4 "...unless it can be shown that the new connection will benefit overall traffic flows" the policy is complete in and of itself and needs no clarification. The criteria upon which to base decisions regarding whether or not to allow additional street connections to thoroughfares will be established at such time as such new connections are proposed. As is routinely the case in these types of situations the applicant and the County will agree on a methodology and possibly a traffic modeling procedure appropriate to the specifics of the case at hand. It is not possible and would be premature to try and define the specifics of such a hypothetical case in a Specific Plan document. No action is necessary to respond to this comment.



**COUNTY OF PLACER
AGRICULTURAL COMMISSION**

CHRISTINE E. TURNER
Agricultural Commissioner
Sealer of Weights & Measures

**AGRICULTURAL COMMISSION
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May 19, 2006

TO: Michael Johnson, Placer County Planning Director
FROM: Agricultural Commission Ad Hoc Working Group
SUBJECT: **Comments on Placer Vineyards Specific Plan, Revised Draft Environmental Impact Report dated March 2006**

The following comments are being submitted on behalf of the Placer County Agricultural Commission by the Agricultural Commission Ad Hoc Working Group:

1. While the Agricultural Water Sub-Committee agrees that proposed construction of additional recycled wastewater storage and conveyance facilities could supplement current agricultural water deliveries in western Placer County, the recycled water needs to be discharged into Auburn Ravine upstream of the existing WWTRF discharge point. Discharging upstream would allow the use of existing conveyance systems for more efficient and effective water delivery for agricultural producers. Therefore, we recommend that the environmental consultant investigate the feasibility and environmental impacts of discharging treated water upstream of the existing WWTRF discharge point approximately 1/3 mile west of Nelson Lane and above existing diversion dams (see attached Map). *Reference to 4.1-13, page 4.1-61.*
2. We recommend that collected assessments be exclusively held by Placer County, and no other entity, to be in compliance with Standard 8 of Exhibit 1 of the Dry Creek/West Placer Community Plan. *Reference to 4.1-13, page 4.1-61.*
3. The Agricultural Commission wants to clarify the cost of this future recycled water and how the water be permanently allocated to the agricultural producers to remain in compliance with Standard 8 of Exhibit 1 of the Dry Creek/West Placer Community Plan.
4. The Agricultural Commission would like to see Recommendation #1 incorporated by reference (see attached Letter, Page 2, dated October 7, 2004 from the Agricultural Commission to Harriet White Chairperson, Placer County Board of Supervisors) to provide appropriate funding to meet the policy objective of Standard 8 of Exhibit 1 of the Dry Creek/West Placer Community Plan and provide for the maintenance of infrastructure. *Reference to 4.1-13, page 4.1-62.*

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5. Table 4.1-5, page 4.1-50 identifies 4,225 acres of farmland being urbanized by the proposed project, while Table 4.1-6, page 4.1-51 identifies only 3,335 acres of farmland within the proposed acquisition areas for the mitigation of loss farmland/open space and represents a difference of 890 acres. This does not represent a 1:1 mitigation ratio cited in Policy 4.1, page 4.4-55 & 56.

E

6. Mitigation Measure 4.4-1a, page 4.4-95, states, "One acre of open space will be preserved within Placer County for each are of open space impacted within the Specific Plan area." This mitigation measure is inconsistent with the statement on page 4.1-51 that, "Under Mitigation Measure 4.4-1a, 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." Mitigation needs to occur within Placer County.

F

Thank you for the opportunity to provide these comments from the Agricultural Commission Ad Hoc Working Group regarding the Placer Vineyards Specific Plan Draft EIR. The Working Group included Will Morebeck, Patti Beard, Jim Brenner and Nick Greco.

cc Placer County Agricultural Commission
Christine Turner, Agricultural Commissioner
Paul Thompson, Supervising Planner

LETTER 30 COUNTY OF PLACER AGRICULTURAL COMMISSION AD HOC WORKING GROUP

Response 30A: The commenters suggest that an alternative design for the proposed facilities be considered and evaluated under CEQA. The County respectfully declines to require the project applicants to perform the requested investigation of the feasibility and environmental impacts of discharging treated water upstream of the existing wastewater treatment plant discharge point. This type of analysis would require project-level analysis of off-site infrastructure components, which exceeds the scope of the Revised Draft EIR. As stated in the Revised Draft EIR, the Placer Vineyards Revised Draft EIR is a project EIR prepared pursuant to Section 15161 of the CEQA Guidelines; however, certain off-site infrastructure is analyzed at a programmatic-level (Revised Draft EIR, page 2-8). Programmatic analysis is used in the Revised Draft EIR where the construction of proposed off-site improvements would be under the control of an agency other than Placer County, and separate environmental analysis is being undertaken, or will be undertaken by that agency, upon final project definition (*Ibid*).

Although subsequent analysis may identify a need to modify the concept described in the Revised Draft EIR, the purpose of describing a project was to arrive at an estimated fee to be paid by the applicants. As described on page 4.1-8 of the Revised Draft EIR: “Because the proposal to satisfy Standard 8 is the payment of a fee, rather than construction of these particular facilities, this Revised Draft EIR does not treat the facilities as an integral part of the ‘project.’ Thus, this Revised Draft EIR is not intended to be a substitute for a formal environmental document to be prepared by the City of Lincoln.” As described on pages 4.1-62 and 4-1-63 of the Revised Draft EIR, it is anticipated that the City of Lincoln will comply with all recommendations of the Environmental Impact Report, City of Lincoln Wastewater Treatment and Reclamation Facility as well as recommendations of the Placer Vineyards Specific Plan Revised Draft EIR. Specifically, Mitigation Measure 4.1-13b recommends that the City perform additional environmental review prior to construction of any facilities not already assessed. For these reasons, it is the County’s opinion that any additional CEQA analysis of alternatives to supplement the programmatic analysis contained in the Revised Draft EIR should be performed by the City of Lincoln at the time an actual project is proposed. The Commission does not raise a concern with regard to the adequacy of the programmatic analysis performed for the conceptual project; therefore no further response in the Final EIR is required.

Response 30B: Commenters recommend that the County of Placer hold all fees collected. The Revised Draft EIR suggests that fees could be paid to the County or PCWA (page 4.1-61). PCWA was included as a likely recipient because the actual provision of agricultural water would be undertaken by PCWA, not the County. The Dry Creek/West Placer Community Plan, Exhibit 1, Standard 8 does not specify or limit who may hold funding. The County acknowledges receipt of the Commission’s recommendation and will address this and similar matters of policy separately from the CEQA process. The comment does not raise an environmental concern that requires a further response in the Final EIR.

Response 30C: Commenters request additional information on the cost of water and how the water will be allocated. The County acknowledges receipt of the Commission’s request and will address this and similar matters of policy separately from the CEQA process. The comment does not raise an environmental concern that requires a further response in the Final EIR.

Response 30D: Commenters request that a previous recommendation to the Board of Supervisors that they provide funding to meet the policy objective of Standard 8 of Exhibit 1 and provide for the maintenance of infrastructure be included in the Revised Draft EIR. The County believes that the fee to be assessed Placer Vineyards Specific Plan participants meets the policy objective of Standard 8 of Exhibit 1. As noted above, the Commission raises matters of policy rather than environmental concerns. The intent of the Revised Draft EIR was to conceptually assess the environmental implications of implementing Standard 8 of Exhibit 1. The Commission does not raise a concern with regard to the adequacy of the environmental analysis; therefore, no further response in the Final EIR is required.

Response 30E: Commenter states that proposed Specific Plan Policy 4.1 requires preservation of open space at a 1:1 ratio, but the project will not preserve farmland at this same ratio. Comment noted. The proposed policy references all types of open space and does not require a 1:1 replacement ratio specific to agricultural land. As described in the Revised Draft EIR, proposed mitigation will substantially lessen the impact relating to loss of agricultural land, but will not mitigate the impact to a less than significant level. Therefore, the impact will remain significant and unavoidable (page 4.1-50). The proposed policy and Revised Draft EIR approach are consistent with the County General Plan, as discussed on page 4.1-50:

The *Placer County General Plan* discourages the expansion of urban uses into agricultural areas (Policy 1.H.2), but does allow such conversion if within community plan areas (Policy 1.H.4). Because the Specific Plan area is within the adopted *Dry Creek/West Placer Community Plan* area, and because Exhibit I to the 1994 *Placer County General Plan* expressly contemplated significant urban development in the area, development of the Specific Plan area is consistent with the General Plan.

The commenter also mistakenly states that the acreage identified in Table 4.1-6 is all that will be required for mitigation for loss of farmland/open space. The Revised Draft EIR acknowledges that the acreages identified in Table 4.1-6 could partially compensate for agricultural land loss, but additional preserves may be required.

The comment does not raise a new environmental impact or issue not already addressed in the Revised Draft EIR. No additional response in the Final EIR is required.

Response 30F: Commenters note an inconsistency between Mitigation Measure 4.4-1a and the third paragraph from the top on page 4.1-51. The inconsistency is acknowledged. The third paragraph from the top on page 4.1-51 is hereby amended as follows to retain consistency with Mitigation Measure 4.4-1a:

As set forth in Section 4.4 of this Revised Draft EIR, the County and the applicants have developed a strategy to mitigate the loss of open space, agricultural land and biological resources resulting from the development of the Specific Plan. Under Mitigation Measure 4.4-1a, a substantial amount of open space must be preserved elsewhere, ~~preferably within Placer County,~~ in Placer

County to offset the loss of open space due to Specific Plan area development. The mitigation acreage is likely to be located primarily or entirely within western Placer County, where the vast majority of undeveloped areas are currently devoted to agricultural activities of some sort.



City of Rocklin

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May 19, 2006

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

RE: Placer Vineyards Specific Plan Revised Draft Environmental Impact Report

Dear Lori:

Thank you for the opportunity to review the above-referenced document. We have completed our review and have the following comments:

1. The primary concern for the City of Rocklin regarding a project of this magnitude is in the area of transportation/circulation. With respect to transportation and circulation, the Revised DEIR does not identify any traffic impacts that would occur within the City of Rocklin because the project "study area" did not include City of Rocklin roadway segments or intersections. The Revised DEIR does identify some City of Roseville intersections that will be significantly affected by the Placer Vineyards project, including several that are located near the City of Roseville/City of Rocklin border and one in the Roseville Galleria Mall area. The Roseville Galleria Mall area, which is adjacent to the City of Rocklin and is served by City of Rocklin roadways, is of particular concern because of existing heavy traffic conditions, pending development on a large scale, and lack of feasible and/or available traffic improvement options (mitigation). The Revised DEIR also identified roadway segment volumes on roadways near the City of Rocklin, some of which showed significant increases in traffic volumes as a result of the Placer Vineyards project, but there was not a Level of Service analysis that accompanied the volume numbers, so it was not readily apparent in the Revised DEIR if the Placer Vineyards project would create roadway segment Level of Service impacts.

Given the above information, the City of Rocklin was unable to determine how the proposed Placer Vineyards project would or would not affect City of Rocklin roadway segments and/or intersections. Per CEQA Guidelines Section 15162.2, "In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects."

The data that was presented clearly shows that City of Rocklin roadways and intersections will receive increased traffic volumes as a result of the proposed project, which should be considered as a change in the existing physical condition. However, conclusions regarding the significance of the additional traffic on City of Rocklin roadways and intersections were not made. We are therefore requesting that the Revised DEIR examine whether the proposed project will create significant

A

Lori Lawrence, Placer County Development Resource Agency

May 19, 2006

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impacts for City of Rocklin roadway segments and/or intersections. Also, feasible mitigation measures should be identified for any significant impacts.

A cont.

2. Within the transportation chapter, mitigation measure 4.7-2a states "Developers of property within the Placer Vineyards Specific Plan shall be responsible for the project's fair share of all feasible physical improvements necessary and available to reduce the severity of the project's significant transportation-related impacts, as identified in this traffic analysis...". The mitigation measure continues with a series of options that could be used to implement the "fair-share" concept, including numbers 6 and 8 that specifically identify those jurisdictions that will receive fair share contributions. The jurisdictions that are identified include the City of Roseville, Sacramento County, Sutter County and Caltrans.

The City of Rocklin has several requests/suggestions with respect to the current wording of mitigation measure 4.7-2a

Firstly, the mitigation measure ties improvements to impacts identified in the traffic analysis and as noted above, the current traffic analysis does not identify impacts in the City of Rocklin. For the reasons discussed above and because the City may want to be eligible for potential "fair-share" funding from the project depending upon the level of traffic impact, the City of Rocklin requests that the traffic analysis be expanded. The analysis should include an examination of potential impacts to City of Rocklin intersections and roadway segments, and an examination of potential feasible mitigation measures for such impacts.

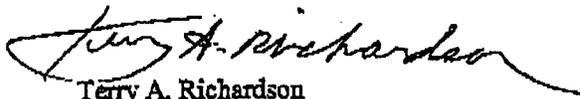
B

Secondly, because the current traffic analysis did not analyze City of Rocklin intersections and roadway segments and a determination of whether the project will have significant impacts to those facilities cannot be made at this time, the City of Rocklin may want to participate in a fair share traffic mitigation concept if in fact significant impacts from the project occur in Rocklin.

Based on the whether or not the expanded traffic analysis identifies impacts on Rocklin streets and intersections, the City of Rocklin may request to become a participant in the fair share funding concept. However, the final determination cannot be made until the potential impacts are identified and the City enters into a more detailed discussion with the County to better understand the fair share funding concept.

If there are any questions, please do not hesitate to contact David Mohlenbrok, Senior Planner, at (916) 625-5160.

Sincerely,


Terry A. Richardson
Community Development Director

LETTER 3I TERRY A. RICHARDSON, CITY OF ROCKLIN

Response 3IA: Commenter observes that the Revised Draft EIR does not identify any traffic impacts within the City of Rocklin and requests that the EIR examine Rocklin roadway segments and intersections. The estimated change in daily traffic volumes due to the proposed project on several western “gateway” roadways to the City of Rocklin is described in the table below. The changes in daily volume are small. Volumes would be less on some gateways under some scenarios with the proposed project than without the proposed project due to a redistribution of trips. As noted in the Revised Draft EIR, the traffic volume forecasts are not based on a simple layering or adding of assumed project-generated traffic volumes onto existing traffic counts. Rather, the Placer County Travel Demand Model is used to predict how travel patterns would change if the Specific Plan land uses are added to existing land uses. The model redistributes trips and can cause traffic to decrease at some locations fairly distant from the Specific Plan area.

The Revised Draft EIR indicates that there were no significant levels of service impacts on City of Roseville intersections that are shared with the City of Rocklin or that are near the City of Rocklin’s border. Therefore, it is reasonable to conclude that there would not be any impact to the City of Rocklin intersections.

Final EIR Table					
Change in Daily Traffic Volumes on Selected Roadway Gateways to City of Rocklin					
Roadway	Segment	Without Project Daily Volume	With Project Daily Volume	Volume Difference	Percent Change in Volume
Existing Plus Project					
Blue Oaks Blvd	East of Lone Tree Blvd	9,500	9,400	-100	-1%
Park Dr	West of Sunset Blvd	20,700	20,700	0	0%
Stanford Ranch Rd	West of Sunset Blvd	19,900	20,400	500	3%
Existing Plus Blueprint					
Blue Oaks Blvd	East of Lone Tree Blvd	9,500	9,400	-100	-1%
Park Dr	West of Sunset Blvd	20,700	20,500	-200	-1%
Stanford Ranch Rd	West of Sunset Blvd	19,900	20,800	900	5%
Cumulative Plus Project					
Blue Oaks Blvd	East of Lone Tree Blvd	16,300	17,000	700	4%
Park Dr	West of Sunset Blvd	32,500	32,000	-500	-2%
Stanford Ranch Rd	West of Sunset Blvd	33,900	34,500	600	2%
Cumulative Plus Blueprint					
Blue Oaks Blvd	East of Lone Tree Blvd	16,300	17,100	1100	5%
Park Dr	West of Sunset Blvd	32,500	31,500	-1000	-3%
Stanford Ranch Rd	West of Sunset Blvd	33,900	34,700	800	2%
Source: DKS Associates 2006					

Response 3IB: Commenter states that Rocklin wishes to be included in the fair share funding contributions to be made by the project described in Mitigation Measure 4.7-2a. For the reasons cited under Response to Comment 31A, there are no impacts to Rocklin roadway segments and intersections that require mitigation. Therefore, Rocklin is not identified as one of those jurisdictions that could receive fair share contributions from the project.

**ELVERTA JOINT ELEMENTARY SCHOOL DISTRICT
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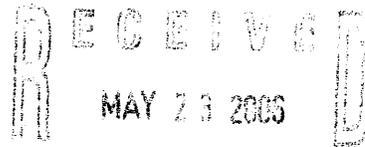
May 15, 2006

Paul Thompson

Placer County Administrative Center

175 Fulweiler Avenue

Auburn, CA 95603



PLANNING DEPT

Dear Mr. Thompson:

Elverta Joint Elementary School District appreciated the opportunity to meet with Holly Heinzen and Susan Goodwin on May 11th at Center School District. The District concurs with issues raised by Center's consultants, issues which they will provide in a separate letter to your office.

In response to the Placer Vineyards EIR, Elverta Joint Elementary School District notes several issues that need resolving as they impact the developer's ability to assure prospective home owners that high quality and adequate school facilities are available to their children.

1. As noted at our May 11th meeting, the California Department of Education, Regulation 2000, "Site and Development Guide" requires 12 acres for an elementary school site and 22.5 for a middle school. A
2. Property owners report that they do not want their home next to a school. Thus, school sites need to be identified from the beginning. B
3. For districts to purchase the land, the California Department of Education (CDE) must approve the site. For approval, the CDE requires finished school lots with infrastructure at the sites, with the site approved free from hazardous waste, with roads for appropriate circulation including sidewalks, with all permits approved and with soil tests approved. Additionally, school sites are required to be at least one thousand (1000) feet from the border of a different school district. They are also required to be at least five hundred (500) feet busy traffic corridors. Sites are also required to be out of the projected one C

hundred year (100) flood plain and sometimes out of the projected one hundred fifty (150) year flood plain. Sites must be certified as outside of the dam mitigation plan. | C cont.

4. If the entire project is opened at once and not phased in, all school sites must be ready to begin construction as part of the Placer Vineyards infrastructure. | D

5. The developers proposed school district boundary changes have negative impact on school districts because it requires each district have its own EIR, an election and attorney fees. Such a process is time consuming. Current school boundaries need to be accommodated in the plan. | E

6. The State Allocation Board (SAB) requires evidence that enrollment exists before it authorizes the construction of a facility. The District is concerned about having available facilities in a timely manner to accommodate growth. Of special concern, is that no provision is made for housing Elverta District students in grades seven (7) and eight (8). While the projection may not necessitate a middle school in that area, students will need to be housed somewhere. The District, again, is concerned about having available facilities. | F

7. A related concern is that the District will need to provide additional bussing, an additional expense, to transport students from the development to receiving sites. | G

Regarding the cost of school construction, the Elverta Joint Elementary School District recognizes that these costs are escalating each year. To place a value in today's market is feasible; however, to predict beyond the current time is difficult. | H

Thank you for the opportunity to express the Elverta Joint Elementary School District concerns relating to the Placer Vineyards EIR.

Sincerely yours,



Dianna Mangerich, Ed.D.
Superintendent

LETTER 32 DIANNA MANGERICH, ELVERTA JOINT ELEMENTARY SCHOOL DISTRICT

Response 32A: The District comments that according to the California Department of Education (CDE), Regulation 2000, “Site and Development Guide” elementary school sites are required to be a minimum of 12 acres and middle school sites a minimum of 22.5 acres. The Specific Plan proposes the development of six elementary school sites, two middle school sites, and one high school site, which would encompass approximately 140 acres (Revised Draft EIR, page 4.11-20). The applicants have revised the school site sizes to comply with the requirements set forth in the California Department of Education, Regulation 2000, “Site and Development Guide.” The revised school site sizes, which will be reflected in the Final EIR, are as follows: (1) elementary school sites – 12 acres; (2) middle school sites – 22.5 acres; and (3) high school sites – 50 acres (Base Plan or “the Project”) and 70 acres (Blueprint Alternative). With these changes to the Specific Plan, the Project will be in compliance with the California Department of Education minimum school site standards and no changes to the Revised Draft EIR are warranted. Also, see Response to Comment 18C.

Response 32B: The District comments that school sites need to be identified early in the planning process in order to avoid conflicts with adjacent residential uses. The Revised Draft EIR identifies the proposed school sites in Figures 3-12 and 4.11-2. Figure 3-12 shows the proposed land uses, which includes the identification of school sites. Figure 4.11-2 identifies the school district boundaries and proposed school locations (also see Response to Comment 18E and revised Figures 3-12 and 4.11-2 in Section Four of this Final EIR). With the exception of the proposed high school, the project proposes open space or park sites adjacent to every proposed school site.

Response 32C: The District comments that the California Department of Education must approve all school sites prior to the District purchasing land and lists several CDE approval criteria regarding infrastructure, roadways, hazardous materials, soils, location relative to district boundaries, and flood hazards. CEQA does not require that the EIR consider the California Department of Education (CDE) site requirements of proposed school sites during the EIR process for a specific plan. Even so, the proposed school sites would comply with all relevant CDE requirements. Specific site requirements, including the presence of hazardous waste, finished infrastructure, and location would be analyzed in a separate environmental review process when the school district decides to purchase the land. The County hopes that this Revised Draft EIR will make that task much easier than it otherwise would have been. The CUSD and GJUHS D recognize that an environmental impact assessment must be completed during the site selection process (Revised Draft EIR, page 4.11-23).

Response 32D: Because there is no phasing plan, District requests that all school sites be ready for construction at outset of project. 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 (Revised Draft EIR, page 4.1-47). The Project applicants intend to develop the Specific Plan over time, with full build out estimated to occur over a 20- to 30-year time period (Revised Draft EIR, page 3-1). As stated in the Revised Draft EIR, the proposed Specific Plan would comply with Placer County General Plan Policy 4.J.6, which