

provides that “[t]he County should include schools among those public facilities and services that are considered an essential part of the infrastructure that should be in place as development occurs” (Revised Draft EIR, page 4.11-22). Also see Response to Comment 18B.

Response 32E: The District requests accommodation of existing school district boundaries. See Response to Comment 18E.

Response 32F: The District states that it is concerned about having available facilities, in particular a middle school. The applicants will pay all required school fees. The Specific Plan would be consistent with General Plan policies 4.J.6, 4.J.10, 4.J.11 and 4.J.13, policies designed to ensure that adequate school facilities are available in a timely manner to accommodate growth (Revised Draft EIR, page 4.11-22). Although the Specific Plan currently does not propose creation of a middle school within the Elverta Joint Elementary School District, if such a need were to arise, the project applicants could either fund new facilities on currently proposed school sites in order to accommodate students in grades seven (7) and eight (8), or change elementary school designations from kindergarten through sixth grade (K-6) to kindergarten through eighth grade (K-8) in order to accommodate these students.

Response 32G: The District is concerned about the cost of additional busing. The costs associated with additional busing that will be required in order to accommodate students in the Specific Plan are included in the definition of “school impact fees” collected pursuant to Proposition 1A and SB 50. As noted in Impact 4.11.4-1, school impact fees generated by new developed are currently deemed by law to be sufficient mitigation of any impacts based on generation of students on school facilities. The County therefore appropriately concluded that the Project developers’ contribution of school impact fees to each affected school district, pursuant to State law, renders the impact of the project on the school districts less than significant (Revised Draft EIR, pages 4.11-23 to 4.11-25).

Response 32H: The District is concerned about escalating construction costs for school facilities. The Revised Draft EIR recognizes that the cost of future school construction is difficult to predict and that costs will change over time. The Revised Draft EIR also states that school mitigation fees and other potential sources, including the State School Building Program or local general obligation bonds, will fund school facilities. Realizing the possible constraint on construction funding in the future, the Revised Draft EIR states that the “funding mechanism should include a method for adjusting the amount of funding to reflect current costs at the time of construction” (Revised Draft EIR, page 4.11-178). The Specific Plan would be consistent with General Plan Policy 4.J.10, which provides that “[t]he provision of adequate school facilities is a community priority. The County and school districts will work closely to secure adequate funding for new school facilities and, where legally feasible, the County shall provide a mechanism which, along with state and local sources, requires development projects to satisfy an individual school district’s financing program based upon their impactation” (Revised Draft EIR, page 4.11-22).

PLACER COUNTY PLANNING COMMISSION

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REVISED DRAFT EIR WORKSHOP -)
PLACER VINEYARDS SPECIFIC)
PLAN PROJECT,)
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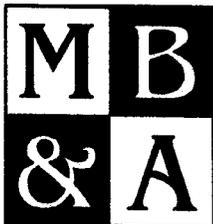
HEARING

175 FULWEILER AVENUE, AUBURN

Thursday, May 11, 2006, 11:13 a.m.

Reported by:

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1 APPEARANCES:

2
3 PLANNING COMMISSIONERS:

4 MICHELLE BURRIS
5 KEN DENIO (recused)
6 LARRY SEVISON
7 GERRY BRETNALL, CHAIRMAN
8 JIM FORMAN
9 NOE FIERROS
10 MIKE STAFFORD

11
12 PLACER COUNTY STAFF:

13 MICHAEL JOHNSON, Planning Director
14 PAUL THOMPSON, Principal Planner
15 SCOTT FINLEY, County Counsel
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1 Auburn, Thursday, May 11, 2006

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3 CHAIRMAN BRETNALL: The Revised Draft
4 Environmental Impact Report on Placer Vineyards.

5 COMMISSIONER DENIO: Mr. Chair, before we get
6 started, I do have property in the subject plan, so I
7 will recuse myself at this time.

8 CHAIRMAN BRETNALL: Ken Denio will be recusing
9 himself from consideration of this matter. Thank you,
10 Ken. And you are leaving the dais.

11 (Mr. Denio left the dais at this
12 time.)

13 CHAIRMAN BRETNALL: As I understand it,
14 Mr. Planning Director, our objective here today is to
15 take input on the environmental document that's in draft
16 stage. There will be no comment or discussion by the
17 Commission? It's merely to make a record on concerns and
18 comments by the public; is that correct?

19 MR. JOHNSON: That is correct, as well as
20 concerns and comments from the Commission.

21 CHAIRMAN BRETNALL: Okay. There will be no
22 action taken today. We're just being a big sponge and
23 soaking up all the comments and so forth. Terry, are you
24 going to have a sign-in sheet for these folks?

25 When you come up to make your comments, make

1 sure you sign in so we get you on the list and make sure
2 you are included in any further comments that come out on
3 this project.

4 Paul, when you are ready, the floor is yours.

5 MR. THOMPSON: Thank you, Mr. Chairman, members
6 of the Commission. Paul Thompson here with the Planning
7 Department. With me here today also from the County
8 staff is Andrew Gaber -- he is with transportation
9 planning; Phil Frantz is with Engineering & Surveying
10 department; also Dana Winynger from Environmental
11 Health; also here today is Gene Smith. He is with Quad
12 Knopf. He is the EIR consultant that the County hired to
13 prepare the Placer Vineyards Specific Plan Revised Draft
14 EIR.

15 Also in the audience today is Kent MacDiarmid
16 and Allan -- Tim Tarron, as well as Sean MacDiarmid.
17 They represent the property owners who have proposed this
18 Specific Plan and are here, as well as several members of
19 their staff.

20 As was indicated by Michael, this is a public
21 hearing to receive comments on the Draft EIR. Basically
22 CEQA requires a 45-day public review period to receive
23 comments on that, on the EIR. We are currently within
24 the comment period. That period ends on May 19th at
25 5:00 o'clock, and during that time the County will

1 receive written comments on the Revised Draft EIR, as
2 well as today we will receive verbal comments on that
3 same document.

4 Then those comments, verbal as well as written,
5 will be given to Gene Smith, and he will prepare a
6 response to the verbal and written comments in what is
7 called the Final EIR. So that's kind of the process that
8 we're undergoing right now.

9 The project itself is 5,230 acres. It's located
10 in southwestern Placer County. Generally it's south of
11 Baseline, north of the Sacramento County/Placer County
12 line, east of the Placer/Sutter County line, and
13 generally west of Dry Creek and Walerga Road.

14 Just as a background to where we're at: Back in
15 1994 the Placer County Board of Supervisors approved the
16 Placer County General Plan Update. As a part of that
17 document, they designated this 5,230 acres as an urban
18 growth area. It was designated also as West Placer
19 Specific Plan.

20 In that General Plan there is an Exhibit 1 that
21 you will hear us refer to many times as how -- and
22 Exhibit 1 basically indicates how this area should grow.
23 It requires a Specific Plan. It requires -- also lists
24 development standards relating to how many units should
25 be located in this area, that it should include a town

1 center and other specific development standards.

2 The project itself, the general overview of the
3 project before us that's being analyzed in this Draft
4 EIR, encompasses 4251 acres and 13,271 acres -- or
5 dwelling units, 422 acres of employment centers,
6 145 acres of retail commercial with a town center,
7 931 acres of open space, parks, and multi-use trails,
8 schools and religious sites, and proposes a 20- to
9 30-year buildout.

10 The next slide includes the actual land use plan
11 that is before us that will be considered by the Planning
12 Commission and the Board of Supervisors ultimately. The
13 entitlements that are requested by the applicant are
14 General and Community Plan amendments, approval of a
15 Specific Plan, rezoning, large lot tentative maps, and
16 development agreements.

17 Generally the project status: Back in 2004 the
18 County first circulated the initial draft EIR for this
19 project. As a result of the comments that were received
20 on that document, the applicant took a step back, revised
21 the project, and based on the receipt of those comments
22 and also proposed -- as a part of that revision, they
23 proposed a SACOG blueprint alternative. The SACOG
24 blueprint alternative increases the density from 14,132
25 units in the Specific Plan area to 21,631, as well as a

1 population increase to 48,400. It also increases parks
2 and religious sites and schools in conjunction with that.

3 The proposed Draft EIR is currently out for
4 circulation. That was circulated beginning in March of
5 this year and, like I said previously, the comment period
6 ends on May 19th.

7 There are 12 environmental analysis sections in
8 the Draft EIR. Those are up on this slide. They include
9 land use planning, visual qualities, aesthetics,
10 hydrology, biological resources, geology, architectural
11 and paleontological resources, transportation and
12 circulation, air quality, noise, population, employment
13 and housing, public services and infrastructure and
14 hazards.

15 I'd just like to just finish up here with this
16 is on a recommendation. This is a public hearing to
17 receive comments on the Draft EIR. It's not a hearing to
18 talk about the merits of the project itself. It's just
19 to receive the comments.

20 And if you have any questions, we would be happy
21 to answer those. Also Gene is available to point out any
22 sections in the EIR where things are discussed.

23 CHAIRMAN BRETNALL: Thank you, Paul.

24 Are there any questions of staff of Paul before
25 we begin receiving comments? Seeing none, then Paul, if

1 there are no members of staff that have anything to say,
2 we would invite --

3 COMMISSIONER FIERROS: I have no questions. I
4 just wanted to make my comments. Will we get a chance to
5 do that before --

6 CHAIRMAN BRETNALL: Go ahead. Do it now.

7 COMMISSIONER FIERROS: Okay. I'm in the Revised
8 Draft Executive Summary book, Impact No. 432-4 (reading):
9 Development and urbanization of the
10 Specific Plan Area could reduce previous
11 area, which in turn would limit the
12 percolation process. Groundwater recharged
13 within a Specific Plan Area could be
14 limited to open spaces and retention
15 facilities.

16 And it's showing that as less than significant,
17 and I think it should be a little bit more than less than
18 significant, particularly in view of the fact that what
19 we just heard about contamination under the McClellan
20 area and also the information brought out in the EIR
21 about contaminated sites within the Placer Vineyards area
22 that, you know, if groundwater is taken out, then the
23 concentration of these contaminants could be a little bit
24 too high, and there would be less percolation to dilute
25 those contaminants.

1 Let's see. There was mention in there about
2 a -- some kind of an insurance program to provide aid to
3 the residents -- surrounding residents when their wells
4 went dry or were contaminated -- anyway, impacted in a
5 negative manner. And I got the feeling that the
6 residents in the area were going to be given money, and
7 what they really need is water. I think there should be
8 some kind of plan to provide fresh water as opposed to --
9 not as opposed to, but something needs to be done to
10 enable them to improve their wells, but in the interim
11 they need water, and I think something needs to be done
12 to get them the water.

13 Let's see. And there was an item in there about
14 where they had to prove that this development was
15 negatively impacting their water supply. And my question
16 there is how do they do this? How do they prove that
17 their wells have been negatively impacted?

18 And you have received my e-mail request that the
19 MAC hear all of the Community Plan changes and also that
20 they, you know, take action of some sort to provide a
21 recommendation on all those changes before they become in
22 concrete.

23 And also in the MAC meeting you had mentioned
24 that the Specific Plan -- at the decision of the director
25 at that time, that the decision was made that it did not

1 have to be consistent with the Community Plan. And I
2 spoke with the director of the Governor's Office of
3 Planning and Research and was advised that, yes, it does
4 have to be consistent with the Community Plan. And to
5 further back that up, why would the applicants be
6 requesting an amendment to the Community Plan and the
7 General Plan if it did not have to be consistent with the
8 Community Plan? My information, as I told you, I would
9 provide as a matter of record. Terry.

10 (Document passed to the clerk.)

11 So if there was any question about it, I would
12 like to see a response from the Governor's Office telling
13 us that it does or does not -- if it does not, I would
14 like to see the response come from the Governor's Office
15 of Plans and Resources. That's it. I'm done.

16 CHAIRMAN BRETNALL: Thank you, Noe.

17 Anybody else on the commission have any
18 comments? Seeing none, then Scott, you look like you
19 want to talk.

20 MR. FINLEY: Mr. Chair, I was just going to let
21 you know that we do have a court reporter here today, so
22 when people come in to comment if they could state their
23 name on the record and then sign in on the sheet here,
24 and the court reporter will be transcribing or recording
25 this so we can have an accurate representation of their

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1 comments. Just informational for the public when they
2 come up.

3 CHAIRMAN BRENTNALL: Very good. Thank you.

4 Well, then, ladies and gentlemen, now is your
5 opportunity to come up and make whatever comments you
6 want on the draft EIR. I won't call anybody up by
7 raising hands. If you can just kind of come up one after
8 another. State your name, say what you have to say, sign
9 in on the log there, and we will listen to you. So come
10 on down. Yes, sir. Come right on up.

11 MR. SINGH: My name is Parminder Singh, and I
12 own some land over there by -- close to that corner of
13 Pleasant Grove and Baseline Road. And they are saying
14 some special zoning. I want to know what is that and
15 when they will develop that.

16 CHAIRMAN BRENTNALL: Be sure to sign in there on
17 the log so we can get your name and address and they can
18 respond to you.

19 MR. SINGH: Sure. Do you want my residence
20 address? I don't have the property address.

21 CHAIRMAN BRENTNALL: Just where we can send you
22 mail.

23 Is there anybody else that wants to speak?

24 Nobody?

25 Scott, would you take that log and put it on

1 your desk, would you mind doing that? Then we can sign
2 in over there and not hold up the comments.

3 MR. SINGH: Thank you very much.

4 MR. WILLIAMS: My name is Richard Williams, and
5 my wife and I own the property north -- just north of the
6 proposed project. We have numerous, numerous complaints,
7 the main one being traffic. There is absolutely no way
8 that you can go ahead with this proposal under the
9 current situation with the traffic the way it is. If you
10 were to sit at our house every morning, you would see
11 traffic backed up for a quarter to a half a mile, in the
12 evening same thing going the other way.

13 There has been -- we have been listening and
14 looking and attending meetings. There have been
15 proposals to make changes in that, but so far not one
16 thing has been done. What they are -- the same thing is
17 occurring on Elverta and Elkhorn Boulevard, same traffic
18 backup, and we see no relief for that anywhere, not
19 within the next 20 years, period.

20 And of course, the water that you are talking
21 about, there is no way to control that.

22 So we really object to this thing. And we don't
23 have -- all we received so far on this project has been
24 the notice that this hearing was to be held. We have no
25 idea what they are talking about as far as how they are

1 going to handle the transportation, how they are going to
2 handle the water control, and all the other things that
3 are involved.

4 CHAIRMAN BRETNALL: Have you seen the draft?

5 MR. WILLIAMS: No.

6 CHAIRMAN BRETNALL: You may want to get a copy
7 of it. I think they may be in libraries --

8 MR. WILLIAMS: I would like to have a copy.

9 CHAIRMAN BRETNALL: And thumb through it
10 because there is still time for you to make written
11 inquiry if you have specific concerns. We appreciate you
12 coming up here today. You know we're not deciding this,
13 right?

14 MR. WILLIAMS: I understand.

15 Where do I get a copy?

16 MR. THOMPSON: Mr. Chairman, I have copies of
17 the CD available here today on the draft EIR, as well as
18 I can point the gentleman to where it is located, hard
19 copies, as well.

20 CHAIRMAN BRETNALL: Are you finished?

21 MR. WILLIAMS: Yes.

22 CHAIRMAN BRETNALL: I didn't want to cut you
23 off. Sign in on the yellow sheet. And get together with
24 Paul after we're done, and he'll make sure you get a
25 copy.

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1 Mr. Singh, you may want to get together with
2 Paul afterwards as well.

3 Bob Lundin, if you would state your name.

4 MR. LUNDIN: Bob Lundin from Loomis. I'm a user
5 of Interstate 80, and I'm really getting pissed off.
6 Traffic on 80 is -- it sucks, and the project is not
7 going to make it any better. So my request is that a
8 transportation plan for an expressway between the project
9 and Interstate 80 and 99 be required. Not stop and go,
10 not using Blue Oaks or any of the side streets. To
11 identify the funding for the expressway.

12 My proposal is that the project be approved --
13 sorry -- building permits are issued only after roadwork
14 has begun on the bottleneck. Take a serious look at
15 extending light rail. With the price of fuel nowadays, I
16 think we need light rail in Placer County overall. At
17 least get the right of way for light rail or mass transit
18 to the project through Interstate 80.

19 And as far as the infrastructure, California
20 Highway Patrol would probably provide service to this
21 area since it's in the County. The officers -- number of
22 officers of CHP has decreased in Placer County in the
23 last ten years. This has got to be fixed somehow. So
24 that's my comments.

25 CHAIRMAN BRETNALL: Okay. Thank you. Sign in.

1 Anybody else? Come right up, sir, and state
2 your name and tell us what you have to say.

3 MR. DIAZ: Good morning. My name is Perry Diaz,
4 and I'm a property owner on Baseline -- actually just
5 west of the boundary of the Vineyards right on Baseline.
6 I understand that it's going to be designated as an SPA,
7 so I was just wondering what are -- what kind of rezoning
8 can be allowed for SPA designated land. Personally I
9 believe that Placer Vineyards is a good project. I
10 believe there is no way to stop growth and going
11 northward is probably one of the better ways of
12 distributing the population growth in the Sacramento area
13 as opposed to concentrating the north or east or south.
14 But as a property owner I also am concerned as to what's
15 going to happen to the particular area between the Placer
16 Vineyards and Pleasant Grove right on Baseline. Thank
17 you.

18 CHAIRMAN BRETNALL: Thank you. Sign in on the
19 yellow sheet if you would.

20 Anybody else want to make a comment? Come right
21 on up.

22 MR. HOLT: Good morning. My name is Larry Holt,
23 and I am a property owner within the Special Plan of the
24 Specific Plan. My concern is assignment of density right
25 within that Special Plan area, what's to be done to the

1 remaining acres of the people that have opted out of this
2 Specific Plan. It's very vague, and it doesn't explain
3 how to petition for the particular allotment of the
4 density within that Special Plan area.

5 CHAIRMAN BRETNALL: Thank you, sir.

6 Anybody else want to speak? We have 40, 50
7 people here. Yes, sir, come on up. Now is your chance.

8 MR. ROBERTS: My name is Randy Roberts. My wife
9 and I own five acres which would be just north of the
10 little leg that sticks out there, which that comes right
11 into the back of my property.

12 My only concern is the density of development.
13 And keeping in mind that this is a very rural area and
14 you're going to be surrounded by rural area in that area,
15 and from the original plan that I read, that was supposed
16 to be some type of a consideration that that would be
17 still developed as rural area, a low density population
18 as it moved eastward. And I would just like to comment
19 that that is a good idea, and I would like to make sure
20 that it stays in that development idea of rural area
21 because there is a lot of horse properties out there and
22 large acreages. And, you know, it's a very nice place to
23 live, and we wouldn't want it to change too much. I mean
24 change is something that's normal, and that's not a bad
25 thing if it's done properly.

1 And that would be my only concern is that
2 everybody is looking at it in that respect, not just to
3 be out there to make the buck but to consider the people
4 who live around there as well. Because it's good for us
5 as well because our property values go up, and we get a
6 few infrastructure additions as it goes along as well.
7 So that would be my only comment is just to make sure we
8 consider the people that live there already and don't
9 overdevelop in an area where you have 5-acre, 10-acre
10 parcels and then stick 9 houses per acre right behind
11 them. That would not be a good idea to me.

12 And I would like to have one of those CDs if
13 that's possible. Thank you.

14 CHAIRMAN BRETNALL: Like Halloween. Come up
15 and testify and get a copy. Thank you, sir.

16 Anybody else want to give us their comments on
17 the Draft EIR?

18 COMMISSIONER SEVISON: Mr. Chairman, if there is
19 no one else coming up right away or no more interest than
20 that, I would certainly enjoy a little bit of comment on
21 the special area. There seems to be a lot of comments on
22 that. Maybe Paul or whoever is best suited could just
23 give us a little touch on that and let everybody be
24 informed as to what is proposed there and how it's going
25 to fall out.

1 MR. THOMPSON: Sure. We have got a slide here
2 up on the screen right now. It is generally located on
3 the western end of the Specific Plan Area, the SPA, which
4 is entitled Special Planning Area. It's approximately
5 980 acres. It makes up approximately 160 -- 150 existing
6 homes are located there. These are properties that are
7 not participating in the current Specific Plan process.
8 There is approximately 21 property owners now that are
9 participating and have proposed this Specific Plan. This
10 is a group of folks that are not participating --
11 currently participating in the Specific Plan process;
12 however, they are in the Specific Plan area in that
13 5,230 acres.

14 So like I said, 980 acres makes up the SPA area.
15 There is approximately 150 existing units within this
16 area. There is a potential for another 63 units, given
17 the vacant land out there, and the potential for the
18 subdivision of land under the existing zoning. Basically
19 the existing zoning out there is about 10-acre minimum,
20 and that was the established with the Community Plan.

21 The one -- with the exception, the one property
22 over right here (indicating). That property there is
23 zoned, I believe, 80-acre minimum. So the proposed
24 Specific Plan allows for 198 new units to be designated
25 to the SPA area, and that would be in addition to the 63

1 that could be developed given the existing zoning.

2 So what the Specific Plan says is that in order
3 to utilize those 198 units, they are on a first come,
4 first serve basis. So a property owner or a group of
5 property owners would come to the County and request a
6 Specific Plan amendment to the Placer Vineyards plan or
7 they could propose a new Specific Plan.

8 And that Specific Plan would look at the
9 density, the location of the units, how infrastructure
10 would be provided to that property, and that would be the
11 process to utilize that 198 units. That's not to say
12 that it wouldn't be commercial. It might be at sometime
13 in the future there may be a need to have commercial out
14 there. But the idea is there would have to be a proposal
15 presented to the County, just like we're looking at a
16 proposal now for this other area.

17 So basically that's how it's presented, outlined
18 in the Specific Plan for Placer Vineyards, as well as in
19 the EIR. What the Specific Plan does do is require that
20 the participating property owners have easements to allow
21 for extension of infrastructure to the SPA area, so it
22 will allow for development of the total 14,132 units. So
23 that infrastructure is going to be sized to allow for
24 that and development of those properties within the SPA,
25 but it does not physically extend infrastructure to

1 individual properties. That's going to be the
2 responsibility of the developers that come in and want to
3 develop this area.

4 COMMISSIONER SEVISON: Now, Noe raised an issue
5 earlier about people's wells failing and having
6 available -- I think he made the comment that they were
7 going to give them money instead of water. And I guess
8 the theory there would have been -- correct me if I'm off
9 base here on this -- they could use that money to extend
10 the infrastructure that's going to be nearby to serve
11 them? Is that the theory behind it? I'm not sure
12 exactly how that works.

13 MR. THOMPSON: You know, I think on that
14 question I would have to defer to Gene Smith and see how
15 it's reported in the EIR.

16 COMMISSIONER FIERROS: I don't think it was that
17 clear in there. That's why I raised the issue.

18 COMMISSIONER SEVISON: Well, I'm just trying to
19 find out --

20 MR. FINLEY: This is just the time to receive
21 comments. If it's a comment, I think it's appropriate
22 for Gene to respond to the comment in the final rather
23 than trying to engage in discussion at this point in
24 time. That's the point of receiving comments, so you can
25 look at it and then respond.

1 CHAIRMAN BRETNALL: Thank you, Paul.

2 Noe, you said you had another comment?

3 COMMISSIONER FIERROS: I just remembered I had
4 another comment on the portion on the water resources.

5 CHAIRMAN BRETNALL: Turn your mike on.

6 COMMISSIONER FIERROS: It dealt with the
7 description of availability and the units of measurement
8 within the description and also -- I believe it was
9 Appendix M. It goes from acre feet to millions of
10 gallons per day of production. I don't know what any
11 kind of conversion rate is, so if you could use the same
12 units of measurements, I think it would make those
13 sections a little bit clearer as to what's available and
14 what can -- what are the capabilities. I just got
15 confused with what was on contract, what's available,
16 acre feet, millions of gallons per day. It just didn't
17 give me a clear picture of what the water resources were.

18 CHAIRMAN BRETNALL: Okay, thank you, Noe.

19 Is there anybody else in the public that would
20 like to comment on this matter? Now is your last chance.
21 So nobody? We'll cut that off. Any more comments from
22 members of the commission?

23 COMMISSIONER SEVISON: Will we hear the comments
24 back in this same type of a forum?

25 MR. THOMPSON: The way it will work is Gene

1 Smith will take the comments and formally respond to
2 those comments in the Final EIR. So what we'll have is
3 the comments that will be written out, and then there
4 will be a physical response to those comments, and that
5 will be set up in the format of a Final EIR.

6 COMMISSIONER FIERROS: It won't be this thick,
7 will it (indicating)?

8 CHAIRMAN BRETNALL: It will be worse. And
9 that's when I guess we get to debate the merits with
10 public and with staff.

11 MR. THOMPSON: There will be subsequent hearings
12 on this project relating to the merits and entitlements
13 proposed by the applicant.

14 CHAIRMAN BRETNALL: Okay, Jim.

15 COMMISSIONER FORMAN: Maybe I can make one more
16 comment about the groundwater usage and my concerns here.
17 Not to -- I'm going to have to reiterate. And that is
18 that the greatest draw down in groundwater will occur in
19 drought years. That's when there is no rain, plus the
20 farmers will be pumping water, plus potentially these
21 urban areas will be pumping more. If that's the case,
22 then the groundwater levels are going to drop. That may
23 mean the trees that would have survived the drought are
24 going to die, streams that would have trickled on through
25 in normal droughts will dry up and sink into sandpits,

1 which may affect the environment. It also may mean the
2 farmers will have to extend their wells much deeper than
3 they would have had not these urban developments gone in.

4 So we really need to see a worst case scenario
5 what will happen if we do pump out 14,000-acre feet a
6 year during a drought when rainfall is 80 percent of
7 normal, or perhaps we need to look at even a worst case
8 scenario because there is very little room for error in
9 the projections that PCWA has made for us. So that's my
10 comment. I would like to see a response in the EIR.

11 CHAIRMAN BRETNALL: Very good. Anybody else
12 have any additional comments? Seeing none, then we'll
13 call this particular matter to a close, and we will
14 submit these matters for consideration in the Final EIR.

15 Thank you, Paul.

16 With that we're adjourned until 1:30.

17 (Time noted: 11:46 a.m.)
18
19
20
21
22
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25

L cont.

LETTER 33 PLACER COUNTY PLANNING COMMISSION HEARING TRANSCRIPT

Response 33A: Commenter questions finding concerning affects on groundwater percolation. The “less than significant” finding is made because in excess of 90% of the soils on the site have little percolation value. In other words surface water does not readily pass into the strata underlying the site (see Revised Draft EIR page 4.3-28).

Response 33B: Commenter inquires about well “insurance program” and wants to know why homeowners aren’t given water rather than money. Commenter also wants to know how persons prove their well is affected. Mitigation Measure 4.3.3-8c describes the referenced program that would require the establishment of a fund to pay for well replacement in the event a well is adversely affected. This could include connection to the public water system that would be constructed to serve the Specific Plan area. In fact this would be the County’s preferred outcome rather than continuing to have homeowners rely on individual wells. The mitigation measure states that “[a]dditional components of the Well Insurance Program will be developed prior to approval of the first small lot tentative subdivision map.” As part of this process, the nature of the “proof” will be determined. It is assumed that a licensed well driller or PCWA would be capable of determining the cause of well failure.

Response 33C: Commenter questions decisions made concerning Community Plan consistency. See Responses to Comments 10A and 10B.

Response 33D: Commenter wants to know about zoning in the SPA. SPA zoning will not be changed under the current proposal. See Responses to Comments 6A, 12A, 23A and 33G.

Response 33E: The commenter has concerns about traffic and water supply. Traffic and transportation-related impacts are fully addressed in Section 4.7 of the Revised Draft EIR. In addition, the traffic analysis was partially recirculated in July 2006 in response to questions. The commenter is referred to these two documents. All required roadway improvements will be made prior to project buildout, including improvements to Baseline Road. Water supply is addressed in Section 4.11.7 of the Revised Draft EIR. The project will rely on surface water. Ground water would only be used as a backup in the event a series of excessively dry years were to occur (Revised Draft EIR pages 4-62 through 4-65).

Response 33F: Commenter is concerned about traffic and transportation improvements. Commenter wrote a letter (Letter 11) raising similar concerns. Please see Responses to Comments 11A, 11B, 11C and 11D.

Response 33G: Commenter is inquiring about what will happen along Baseline within the SPA. See Responses to Comments 6A, 12A and 23A. No changes are proposed to land use along Baseline Road within the SPA. Dwelling units available under the Specific Plan could be applied for by individual property owners over time, which could lead to some increase in density. Baseline Road will also be widened over time to accommodate project and area traffic; however, plans for its widening will not encroach upon existing residences along the south side of Baseline Road.

Response 33H: Commenter wishes to know how density will be assigned within the SPA. See Responses to Comments 6A and 12A.

Response 33I: Commenter is concerned about the density of development in proximity to the SPA. See Responses to Comments 6A and 12A. It is an accurate observation that relatively high density areas are proposed in proximity to the existing rural area (SPA). However, the Specific Plan and Revised Draft EIR have established a number of buffer and design mechanisms to minimize impact on the SPA. These concepts and mechanisms are discussed under Impacts 4.1-1, 4.1-5, and 4.1-7 appearing in Section 4.1 of the Revised Draft EIR. In addition various buffering concepts are described in more detail in Revised Draft EIR Section 4.2, on pages 4.2-48 and 4.2-49. Various SPA buffering concepts are illustrated on Revised Draft EIR Figure 4.2-6. With the buffering concepts proposed, it is the County's opinion that impacts on the SPA are minimized.

Response 33J: Commenter wants to know if money from Well Insurance Program can be used to extend water supply infrastructure. See Response to Comment 33B.

Response 33K: Commenter is concerned that the Revised Draft EIR references "acre feet" and "gallons per day" with no conversion factor. Comment noted. A conversion factor will be provided in any new documentation. An acre foot of water equals 326,000 gallons.

Response 33L: Commenter is concerned about use of groundwater. Commenter is referred to Response to Comment 15K for a more complete discussion, including a summary of PCWA's recently completed Integrated Water Resources Plan (Final EIR Appendix FEIR-A).

The project is required to have a water supply consisting of 100% surface water (some of which is recycled water for irrigation of parks and landscape corridors). Groundwater is utilized only as a back-up and emergency supply in the event of dry year cutbacks (drought) or short term delivery problems with the surface supplies such as emergencies or planned maintenance shut downs.

During a drought, PCWA may utilize groundwater to offset a reduction in surface water from the Sacramento River. The use of groundwater will only occur infrequently. Stabilization has occurred in large part to actions taken by PCWA and Sacramento Suburban Water District (SSWD) to utilize surface water during wet and normal years in the SSWD in lieu of continually pumping ground water. This has been accomplished through an agreement between SSWD and PCWA to use currently available PCWA water rights, treat the water at the San Juan Peterson Water Treatment Plant and deliver it to SSWD customers through the San Juan Cooperative Pipeline. This allows recharge to the groundwater to occur because the historic groundwater pumping has been discontinued for that certain period in which surface water is available under the agreement between SSWD and PCWA.

When groundwater pumping has ceased it allows the groundwater to be recharged naturally and levels to rise. This is referred to as in lieu recharge and allows groundwater that otherwise would have been pumped to meet customer's demands to be banked in the ground for use during infrequent periods of drought without affecting the long term level of the groundwater. Thus

when groundwater use is necessary it can occur without lowering of the groundwater levels due to the banking that has occurred in wet and normal years.

To further support the infrequent use of groundwater for backup and emergency supplies, PCWA has noted that as land which historically pumped groundwater for agricultural irrigation and domestic use converts to more urban use, this annual historic groundwater use will be discontinued. The discontinued annual use reduces the total groundwater pumping, in the area and frees use of groundwater for periodic use by PCWA without a net increase in the long-term average annual groundwater pumping.

Portions of the land within the Placer Vineyards study area have historically been used for agricultural purposes. As infrastructure did not exist to deliver surface water to the area, all agricultural water demands have been met by groundwater. Private agricultural wells and pumping histories are not required to be submitted to the state, and therefore there is no complete record of actual groundwater use. In this absence of actual pumping records, an estimate of groundwater use provides a range of probable use.

In the Western Placer County Groundwater Storage Study, the historical groundwater use, future groundwater use, and impacts to the groundwater basin were analyzed. The study area included the land bordered by the Sacramento County line on the south, the Sacramento River on the west, the Bear River on the north, and the eastern boundary of the groundwater basin on the east. An estimate of groundwater use for the Placer Vineyards Specific Plan study area was not specifically provided, but information provided in the report can be used to estimate the historical groundwater use in the Place Vineyards area.

Figures 2-3 and 2-4 (numbered herein as Figures 3A and 3B) from the report are reprinted at the end of this section. Figure 2-3 provides a snapshot of the Department of Water Resources (DWR) cropping land use survey data for 1994 in Placer County. Figure 2-4 presents the average annual irrigation demand based on the methodology presented in the report. The area is divided into quarter sections from the Public Land Survey Grid, with each quarter section representing 640 acres. The Placer Vineyards Specific Plan study area is approximated on the figure. Using this outline, there are approximately 2 grids with average demand 20-40 inches per year, and 2.5 grids at 1-20 inches per year. Converting the lower and upper demands to annual demand, groundwater usage ranges from 2,250 to 6,900 acre-feet per year (AFA), respectively. Page 4.3-49 of the Revised Draft EIR conservatively reports groundwater use within the Placer Vineyards Specific Plan area at approximately 2,650 AFA, much of which will cease over time with project development.



August 9, 2006

Attn: Lori Lawrence, Senior Planning Technician
Placer County Community Development / Resource Agency
11414 B Avenue
Auburn, CA 95603

RE: Placer Vineyards - Administrative Final EIR (July 2006)

Dear Ms. Lawrence,

Thank you for the opportunity to review the above mentioned EIR. Placer County Facility Services, Solid Waste Management Division provides staffing for the Western Placer Waste Management Authority (Authority). On December 12, 2005, the Authority commented on the Revised Draft EIR (1st Administrative Draft). However, we did not receive the subsequent Revised Draft EIR dated March 2006 and therefore did not notice that not all of our comments were addressed, specifically:

A

1. Regarding our comment, "We agree with the intent of **Mitigation Measure 4.11.5-1a**. However, it should be restated to read that contractors must provide on-site separation of construction debris to assure a minimum 50% diversion of this material, or all construction debris must be hauled to the WPWMA MRF for appropriate recycling."

B

The underlined portion of this comment was not reflected in the March 2006 draft. Although it is entirely their option how to divert the construction debris, it may be to their advantage to add the WPWMA MRF as an option since it would ensure the material is recycled.

2. Regarding our comment, " We also agree with the intent of **Mitigation Measure 4.11.5b**. However, the fair share contribution would be to obtain land and/or construct a new transfer station in the western Placer County area. This fair share payment would be in addition to the tipping fees normally charged at the WPWMA solid waste handling and disposal facilities."

C

The underlined portion of this comment was not reflected in the March 2006 draft.

3. Regarding our comment, " One additional mitigation measure that should be included is that adequate space for the placement of bins to collect source-separated cardboard and office paper will be provided in the commercially developed areas of the plan area."

D

This comment was not reflected. Provision for adequate space for recycling containers is required per County Code Section 8.16.080 and Public Resources Code Section 42900, et seq.

Lori Lawrence, Senior Planning Technician
Placer Vineyards - Administrative Final EIR (July 2006)
August 9, 2006
Page 2

Thank you for the opportunity to respond. Our comment letter dated December 12, 2005 is attached for your reference. Please feel free to call me at (530) 886-4965 should you have any questions.

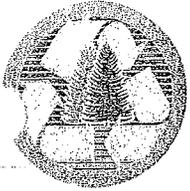
Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Hanson", is written over a horizontal line.

Chris Hanson
Environmental Resource Specialist

CH/ch

Attachment: Comment Letter dated December 12, 2005



**WESTERN PLACER
WASTE MANAGEMENT AUTHORITY**

Bill Santucci, Chairman

G. Magnuson, Rocklin – R. Weygandt, Placer County
R. Rockholm, Roseville – S. Short, Lincoln
J. Durfee, Executive Director

December 12, 2005

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

Re: Revised Draft Environmental Impact Report – Placer Vineyards Specific Plan (1st Administrative Draft)

Dear Ms. Lawrence:

Staff of the Western Placer Waste Management Authority (WPWMA) has reviewed the 1st Administrative Draft of the Revised Draft Environmental Impact Report for the Placer Vineyards Specific Plan (DEIR). Generally, we agree with the comments, conclusions, and proposed mitigation measures regarding solid waste as stated in the DEIR. However, we would like to clarify several items as follows:

- On page 4.11-27 it is stated that the MRF currently receives approximately 249,255 tons of waste per year. A more accurate figure, based on our records, is 281,300 tons of waste per year. The figure for waste acceptance at the MRF on page 4.11030 should also be corrected.
- On page 4.11-28 it is stated that the tipping fee for general refuse is \$11.75 per cubic yard. The current fee is actually \$12.00 per cubic yard.
- There appears to be mathematical errors on Table 4.11-5. The Total Build Out figures are not equal to the sum of the figures above them. Also, in that table the commercial build out factor is incorrectly stated as 2.5 lbs/day/100 sf.
- We agree with the intent of Mitigation Measure 4.11.5-1a. However, it should be restated to read that contractors must provide on-site separation of construction debris to assure a minimum 50% diversion of this material, or all construction debris must be hauled to the WPWMA MRF for appropriate recycling.

LETTER 34 CHRIS HANSON, WEST PLACER WASTE MANAGEMENT AUTHORITY

Response 34A: Commenter explains that the Waste Management Authority (WMA) did not receive the Revised Draft EIR in a timely fashion. The County apologizes for the oversight and is treating the WMA's letter as a comment on the Revised Draft EIR, even though the County received the letter after the close of the comment period.

Response 34B: Commenter agrees with intent of Mitigation Measure 4.11.5-1a, but proposes the addition of language that would permit unseparated construction debris to be hauled to the WMA's materials recycling facility (MRF). Although the current mitigation measure reduces any potential impact related to recycling of construction debris to a less than significant level, the County has no objection to offering the option suggested by the WMA. Mitigation Measure 4.11.5-1a is hereby amended to read as follows:

4.11.5-1a *Contractors shall be required to provide on-site separation of construction debris to assure a minimum 50% diversion of this material from the landfill, or all construction debris shall be hauled to the WMA MRF for recycling.*

The change raises no new environmental issues.

Response 34C: Commenter agrees with intent of Mitigation Measure 4.11.5-1b, but proposes the addition of language that would require the project proponents to obtain land and/or construct a new transfer station. The County disagrees that the project proponents should be singled out to obtain land or construct a transfer station. It is assumed that the fair share contribution proposed by Mitigation Measure 4.11.5-1b would adequately fund the future cost of all facilities necessary to support waste management and disposal in Western Placer County and that the WMA would construct the transfer station with the funds received, if a transfer station is determined to be necessary.

4.11.5-1b *Projects in the Specific Plan area shall contribute a fair share amount toward expansion of the MRF (including accommodation of a greenwaste program for the Specific Plan area ~~Placer Vineyards~~) and landfill to the Western Placer Waste Management Authority. Expansions to be funded with the fair share payment may also include facilities not located on the site of the landfill such as transfer stations serving the Specific Plan area. A mechanism for ensuring that this fair share payment is implemented shall be described in the Development Agreement for the Specific Plan.*

Response 34D: Commenter requests that a mitigation measure be added requiring space for office waste recycling bins in commercial areas. The commenter also points out that office waste recycling bins are required by County Code Section 8.16.080 and PRC Section 42900, et seq. As is stated on page 2-13 of the Revised Draft EIR (Mitigation Approach), "...existing regulations may also address identified concerns. Such regulations are discussed, but not treated as

mitigation, because they are already required by the project.” Therefore it is not necessary to add the specific language recommended by the WMA as project-specific mitigation.

DEPARTMENT OF TRANSPORTATION

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September 1, 2006

06PLA0024

SCH# 1999062020

Placer Vineyards Specific Plan

Revised Draft Environmental Impact Report (DEIR)

06PLA80 PM 3.60

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

Dear Mr. Thompson:

Thank you for the opportunity to comment on the Placer Vineyards Specific Plan (PVSP) DEIR. This specific plan covers 5,230 acres in unincorporated Southwest Placer County adjacent to the Sacramento and Sutter County lines. The proposed 20 to 30 year PVSP build out for 4,251 acres could include approximately 14,100 dwelling units and 33,000 residents, 420 acres of employment centers, 140 acres of retail and commercial centers, and 930 acres of parks and open space. Additionally, the DEIR includes alternative densities for the PVSP including a Blueprint Alternative that includes over 21,000 dwelling units and 52,000 residents. This letter pertains to the Revised Draft EIR for the Placer Vineyards Specific Plan, and does not address the Partially Recirculated Revised Draft EIR for Placer Vineyards Specific Plan, which we are currently reviewing.

Caltrans appreciates Placer County's leadership, and the willingness demonstrated by the PVSP proponents, to consider new models for addressing the planning and funding of the appropriate transportation infrastructure network needed to maintain mobility for residents and businesses. The concept of a sub-regional and/or a regional development fee to facilitate the construction of this system holds particular promise. Caltrans has both the desire and the responsibility under CEQA to assist lead agencies in fully disclosing local land use change impacts and formulating appropriate mitigation strategies through the Local Development/Intergovernmental Review process. The public will be best served by appropriate cumulative and comprehensive analysis across sub-regions and ideally across the entire region. There are significant challenges in that approach and we will work with you to transcend those challenges and optimize our current opportunity to meet the foreseeable needs of the future. We look forward to collaborating with all Placer County jurisdictions to link each individual project to a regional context to more efficiently and effectively implement regional strategies. Hopefully, we will be able to reduce and possibly eliminate the need for individual project comments addressing cumulative traffic impacts. More importantly, the development process will become more predictable and efficient if we succeed.

A

Our June 8, 2006 and June 22, 2006 meetings with Placer County’s staff and consultants to discuss the details of the PVSP project and the additional information provided later have been helpful, but Caltrans still disagrees with the constraints placed on the technical traffic analysis and has some concerns that proposed mitigation language is not sufficient to ensure impacts will be addressed. This letter documents examples of our concerns regarding these issues. Note that we still consider our May 26, 2006 draft comment letter an independent and valid document, and have enclosed it to reference the previous comments.

The major technical issues relate to:

- 1) Employment and housing location (Jobs / Housing balance) assumptions;
- 2) Roadway facility capacity assumptions; and,
- 3) Language regarding possible State Highway System mitigation measures and procedures.

A cont.

Jobs/Housing Balance Assumptions

We strongly support the goal of working toward an efficient jobs and housing balance. However, any traffic model used for analysis must use realistic assumptions regarding residential and employment locations based on current commuting patterns and reasonable assumptions about future activities that may affect the jobs/housing balance. There appears to be a fundamental error in the employment locale assumptions for the PVSP analysis, which results in employment trip ends in close proximity to the PVSP for an unrealistic number of trips. For example, the 2003 Longitudinal Employment Household Data Census report indicates that approximately 27 percent of workers living in Placer County work in Sacramento County and that six percent of workers living in Sacramento County work in Placer County. Even if Placer County enlarges its employment base, it is unrealistic to assume that there will not still be a significant amount of cross-county commuting on primary access routes, including the State Highway System, to and from Sacramento. Accordingly, the TIS should be revised to more realistically reflect employment trip end locations.

B

Transportation Facility Capacity Assumptions

The traffic model assumptions for the TIS must use reasonable assumptions and not be unrealistically constrained regarding the capacity of the future state and local transportation system for the model to accurately assign traffic to appropriate roadways. The DEIR acknowledges that many routes and roads will need to be expanded beyond the capacities assumed for the DEIR traffic analysis. Fair share funding is proposed for many major capacity expansions such as widening of both SR70/99 and SR 65. Including those foreseeable improvements in the traffic analysis would provide a more realistic analysis of impacts associated with the project’s completion. Using the current configuration of those State highways resulted in unrealistic indicators of demand and associated impacts. For example, the study indicates 152,300 external trip ends will be generated by the project, yet only assumes average daily traffic (ADT) increases of 3,300 vehicles traveling south on SR 99 from the Riego Road intersection and 1,700 vehicles traveling south on SR 65 from the Pleasant Grove interchange. The TIS should be revised to more realistically reflect future State Highway capacities for actual traffic demand for SR 65, SRs 70/99, and Interstate 80.

C

State Highway System Mitigation and Mitigation Procedures

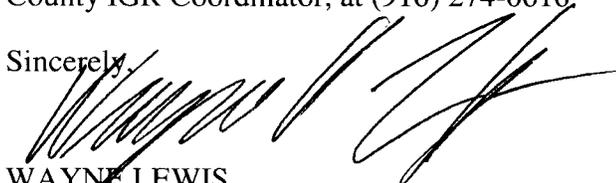
We have three areas of general disagreement with how the DEIR addresses State Highway System mitigation. First, we disagree with all of the findings of "significant and unavoidable" with regard to state highway impacts, if such findings are based on the statement that "the improvements lie outside of the jurisdiction of Placer County". CEQA makes no allowances for such a finding and mandates that significant impacts be mitigated, no matter where their location. Furthermore, Caltrans, as the responsible agency for authorizing the improvements to mitigate State Highway System impacts, has procedures in place to facilitate the implementation of these mitigation measures.

Second, the phrase "if and when an appropriate fee mechanism has been adopted" (p 4.7-52) should be amended since it implies that the project is not responsible for proportional fee contributions. We understand the desire to acknowledge possible future fee mechanisms, but the need to mitigate impacts is not statutorily linked to a specific fee mechanism (for example, a regional development fee) being in place. We recommend that the final conditions of approval should include appropriate caveats to address regional development impact fees, should they be implemented in Placer County, in terms of supplanting any fees required to address the significant immediate and cumulative impacts to which this project is contributing traffic and ad hoc impact fees. Absent the existence of such programs, development projects must continue to individually mitigate their impacts to the State Highway System through nexus based, proportional share funding contributions to appropriate State Highway System projects, or through direct implementation of mitigation projects on the State Highway System.

Third, the phrase "to be made available to Caltrans if and when Caltrans and Placer County enter into an enforceable agreement consistent with State law and Placer County General Plan Policy 3.A.15" should be deleted. The need to mitigate impacts is not statutorily linked to any specific fee mechanism (for example, an existing agreement between the responsible agency and the lead agency) already being in place. Furthermore, Caltrans already has procedures in place to assist local agencies with the implementation of local development mitigation measures. These methods include: 1) allowing for the construction of State Highway System improvements by cooperative agreement with the lead agency, 2) the local agency can collect and bank the development impact mitigation fees for the future State Highway System project, and, 3) if the lead agency so desires, Caltrans can directly receive the funding from the developer for the State Highway System mitigation. Given the magnitude of the PVSP it is likely that multiple approaches may be taken to address various State Highway System impacts. We would be pleased to discuss possible methods with the County and the project proponent.

If you have any questions regarding these comments, please call me at (530) 741-4337; Marlo Tinney, Office Chief for Transportation Planning-East at (916) 274-0634; or Bob Justice, Placer County IGR Coordinator, at (916) 274-0616.

Sincerely,



WAYNE LEWIS
Deputy District Director
Planning and Local Assistance

Enclosure

c: State Clearinghouse
PCTPA

D

DEPARTMENT OF TRANSPORTATION

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May 26, 2006

DRAFT COPY

06PLA0024

SCH# 1999062020

Placer Vineyards Specific Plan

Revised Draft Environmental Impact Report (DEIR)

06PLA80 PM 3.60

Mr. Paul Thompson, Principal Planner

Placer County Planning Department

11414 B Avenue

Auburn, CA 95603

Dear Mr. Thompson:

Thank you for the opportunity to comment on the Placer Vineyards Specific Plan. This letter outlines our concerns about the DEIR and impacts to the State Highway System. Additional comments are provided in the enclosed Attachment. We would appreciate the opportunity to work with you to more clearly assess project impacts to the State Highway System. Our comments are as follows:

- The development of this project will significantly impact the State Highway System (including Interstate 80 (I-80), State Routes (SR) 65, 99, & 70). The DEIR appears to inadequately address traffic impacts to the State Highway System.
- While the Summary of Impacts and Mitigation Measures outlined in Chapter 4.7- Transportation and Circulation element of the DEIR lists potential mitigation to State Highway System facilities, the DEIR seems to link mitigation and the payment of proportional fees for State Highway System improvements to the implementation of a comprehensive development fee program. Although we applaud and support the concept of an equitable regional fee structure, no regional fee program is now in place and the concept as proposed in the DEIR appears to be inconsistent with CEQA requirements, which do not allow for such a linkage as a reason not to implement mitigation measures.
- The fact that state highways are not under the jurisdiction of the county is not an allowable finding under CEQA not to mitigate a significant impact. Significant impacts must be addressed, regardless of where those impacts occur. In this instance, the project is creating significant impacts to the State Highway System, which must be mitigated as a condition of project approval. Caltrans, as the responsible agency, is prepared to work with the County to determine the nexus project improvements and proportional fee contributions from this project.

E

F

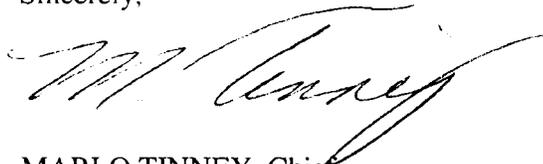
G

- We note that Caltrans has the authority and procedural mechanisms in place to work with other agencies to develop mitigation projects on the State Highway System.

H

We look forward to meeting with you to discuss this project further, and would appreciate the opportunity to provide additional comments, as discussions with County staff and our further analysis continues. If you have any questions regarding these comments, please call Bob Justice at (916) 274-0616.

Sincerely,



MARLO TINNEY, Chief
Office of Transportation Planning – East

Attachment

c: State Clearinghouse

PLACER VINEYARDS LETTER ATTACHMENT

Right-of-Way – Encroachment

- All work proposed and performed within the State’s highway right-of-way must be in accordance with Caltrans’ standards.
- If any work will be performed within the State’s right-of-way, a Caltrans encroachment permit will be needed. Inquiries can be made to Mr. Bruce Capaul at (530) 741-4403.

I

Hydrology and Hydraulics

- The development of this site will increase impervious surface area through the construction of roads, driveways, homes, garages, etc., with a corresponding increase in surface water (storm water) runoff. This project will decrease surface water detention, retention, and infiltration. Any cumulative impacts to Caltrans’ drainage facilities, bridges, or other State facilities arising from the peak (100-year) storm event should be minimized through project drainage mitigation measures. All grading and/or drainage improvements must perpetuate, maintain, or improve existing drainage pathways and may not result in adverse hydrologic or hydraulic conditions within the State’s highway right-of-way or to Caltrans’ drainage facilities. Means of accomplishing this, if necessary, shall be identified and backup calculations supporting this conclusion provided to the Caltrans District 3 Hydraulics Branch. Please identify proposed runoff and outfall patterns.
- Increases in peak runoff discharge for the 100-year storm event to the State’s highway right-of-way and to Caltrans’ highway drainage facilities must be reduced at, or below, the pre-construction levels with no net increase in the peak discharge. All runoff from the project area that will enter the State’s highway right-of-way and Caltrans’ highway drainage facilities must meet all Central Valley Regional Water Quality Control Board (RWQCB) water quality standards. The cumulative effects on drainage due to development within the region should be considered in the overall development plan of this area.
- No net increase to 100-year storm event peak discharge may be realized within the State’s highway right-of-way and/or Caltrans’ drainage facilities as a result of the project. Further, the developer must maintain, or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished through the implementation of storm water management Best Management Practices (BMPs), (i.e., detention/retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.) as applicable. Once installed, the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.
- Runoff from the proposed project that will enter the State’s highway right-of-way and/or Caltrans’ drainage facilities must meet all Central Valley Regional Water Quality Control Board water quality standards prior to entering the State’s highway right-of-way or Caltrans’ drainage facilities. Appropriate storm water quality BMPs, (i.e., oil/water separators, clarifiers, infiltration systems, etc.) may be applied to ensure that runoff from the site meets these standards, (i.e., is free of oils, greases, metals, sands, sediment, etc.). Once installed, the property owner must properly maintain these systems.

J

PLACER VINEYARDS LETTER ATTACHMENT

- No detailed drainage plans, drawings or calculations, hydrologic/hydraulic study or report, or plans showing the “pre-construction” and “post-construction” coverage quantities for buildings, streets, parking, etc. were received with the application package. In order to adequately evaluate project impacts upon the State’s right-of-way and Caltrans’ drainage facilities, we request that you request these documents from the project proponent and send them to the above address for review and comment prior to final project approval.

J cont.

Landscape Architecture

- In reference to Community Design Policy 6.6-2, Caltrans suggests a blend of various tree species be included in the proposed roadway tree design. A monoculture of trees may result in the loss of all street trees if and/or when the trees develop diseases or insects. A mixture of two to four different tree species will minimize losses to diseases and/or insects and preserve visual enhancement of the specific plan area.
- Caltrans suggests eliminating the non-native Eucalyptus Polyanthus, Aristocrat Pear, and the Canary Island Pine trees from the streetscape list. It would be preferable to use native trees as described in the DEIR (e.g., Arbutus unedo ‘Marina’, foothill pines).
- Caltrans also suggests eliminating the proposed use of the Fraxinus and Giant Sequoia trees. Fraxinus is subject to the anthracnose fungi, and when stressed it becomes susceptible to insect borers in the region. The Giant Sequoia tree does not maintain well in this region. The elimination of the Jacaranda and Mayten trees is advised as the Jacaranda is frost intolerant and may not survive, and the Mayten is dying out in surrounding areas.

K

LETTER 35 WAYNE LEWIS, DEPARTMENT OF TRANSPORTATION

NOTE: Although the Department of Transportation (Caltrans) letter was not received by the County until September 1, 2006 (originally due May 18, 2006), the County is treating the letter as timely received, based on a prior agreement with Caltrans.

Response 35A: The commenter compliments the County and applicants on their willingness to work with Caltrans on regional transportation issues and strategies. Caltrans, however, still disagrees with some of the technical analysis and has concerns with some of the mitigation language. Letters were attached that detail the concerns. Technical concerns are primarily related to employment and housing location assumptions, roadway facility capacity assumptions, and State highway system mitigation measures and procedures.

The County wishes to reiterate its continuing desire to work with Caltrans to resolve issues related to State facilities. Impacts to State Highways and fair share mitigation were addressed in both the Revised Draft EIR and the Partially Recirculated Revised Draft EIR. Specific technical points raised by Caltrans are addressed below under Responses to Comments 35B, 35C and 35D.

Response 35B: The commenter questions the employment locale assumptions used in the traffic analysis. Existing and future employment locations in the EIR analysis were not simply “assumed” but were estimated by the Placer County Travel Demand Model, which was used in the EIR analysis to forecast changes in travel demand/patterns due to the proposed project. This model package has a trip distribution model that estimates where the job-end of a home-to-work trip would be located. The Placer County trip distribution model is based on the same formulation as SACOG’s region travel demand model (SACMET). The SACMET model was calibrated to data from a regional household travel survey conducted by SACOG in 2000.

The [Table below](#) (Comparison of Work Trip Distributions Placer County Travel Demand Model versus US Census Data) compares commute trips from the Placer County Travel Demand Model’s 2004 base year to data from the 2000 Census. The commenter states that:

...the 2003 Longitudinal Employment Household Data Census Report indicates that 27 percent of workers living in Placer County work in Sacramento County and six percent of the workers living in Sacramento County work in Placer County.

Data obtained from the US Census 2000 Gateway web site indicate that about 30 percent of workers living in Placer County work in Sacramento County, or somewhat greater than the percent stated by the commenter. As shown on the [Table](#), the Placer County Travel Demand Model predicts that 32 percent of Placer County workers commute to Sacramento County and that 7 percent of the workers living in Sacramento County work in Placer County. Thus the [Table](#) clearly demonstrates that the Placer County Travel Demand Model provides very reasonable estimates of the current work locations of Placer County residents.

The travel demand model was used to estimate how work locations would change over time due to the substantial growth in jobs and housing in the Sacramento region. As shown in the [Table](#),

the Placer County Travel Demand Model estimated that about 40 percent of residents of the proposed project would commute to Sacramento County under cumulative conditions. The percentage of project residents commuting to Sacramento County is greater than Placer County as a whole due to its location just north of the Sacramento County Line.

The commenter appears to be using the difference in traffic volumes for a scenario without the proposed project and traffic volumes for a scenario with the proposed project as a way to estimate the distribution of trips from the proposed project. As discussed below, such a calculation does not provide an accurate distribution of project trips due to the estimated changes in travel patterns for non-project trips predicted by the travel demand model.

Final EIR Table							
Comparison of Work Trip Distributions							
Placer County Travel Demand Model versus US Census Data							
Residential Location	Work Location	2000 Census			Placer County Travel Demand Model		
		Caltrans Comment Letter	US Census Web Site¹		2004 Base Year		Cumulative with Project
		Percent	Workers	Percent	Commute Trips (one way)	Percent	Percent
Placer County	Placer County		69,554	60%	72,267	62%	69%
	Sacramento County	27%	35,458	30%	38,133	32%	22%
Sacramento County	Placer County	6%	29,788	6%	26,887	7%	12%
Placer Vineyards	Sacramento County			NA		NA	40%
	Placer Vineyards			NA		NA	34%
	Other Placer County			NA		NA	14%

¹ Percentage calculations from data provided on US Census Bureau Web Site on "County-To-County Worker Flow Files" (<http://www.census.gov/population/www/cen2000/commuting.html>)

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 project land uses are added to Existing No Project or Cumulative No Project land uses. Compared to conditions without the proposed project, the model redistributes trips, to rebalance trips for work and other trip purposes. When 14,132 dwelling units and about 7,600 jobs are added to the project site, with development outside the project site remaining constant, the model predicts a substantial change in travel patterns would occur.

For example, under the No Project scenario, the model predicts that some residents of Sacramento County would work at Hewlett Packard in Roseville. When the proposed project land uses are added, the model predicts that some of the residents of the proposed project would also work at Hewlett Packard. Since the employment at Hewlett Packard remains the same under both scenarios with and without the proposed project, the model rebalances work trips in the region and thereby predicts that fewer Sacramento County residents would commute to Hewlett Packard in Roseville under Cumulative Plus Project conditions than Cumulative No Project conditions. This example of the redistribution of work trips is a logical result of introducing a large number of new homes in the region.

To help respond to this comment, daily vehicle trips (for all purposes, not just work trips) that have an origin or destination within the proposed project were “assigned” to the model’s roadway network to show the amount of project traffic that uses each roadway segment. The following Table (Daily Traffic Volumes Related to Proposed Project Crossing Sacramento County Line Cumulative Conditions) shows how the estimated number project trips using roadway segments that cross the Sacramento/Placer County line would differ from the calculated difference between the traffic volumes under Cumulative Plus Project conditions and Cumulative No Project conditions. The travel demand model predicts that about 67,200 daily vehicle trips that have an origin or destination within the proposed project would cross the Sacramento/Placer County line between Walerga Road and State Route (SR) 70/99. This represents about 34 percent of the trips generated by the proposed project.

Using the same model runs, the estimated difference in traffic volumes between the Cumulative Plus Project scenario and the Cumulative No Project scenario on roadways that cross that portion of the county line was estimated at 33,700 daily vehicles trips. The difference between the numbers in the two columns of the Table reflects the redistribution of travel due to proposed project.

Final EIR Table		
Daily Traffic Volumes Related to Proposed Project Crossing Sacramento County Line Cumulative Conditions		
	Daily Traffic Volume Difference between Cumulative with Project and Cumulative No Project¹	Daily Project Vehicle Trips using Roadway under Cumulative with Project Conditions¹
Walerga Road	1,900	5,500
Watt Avenue	6,600	23,300
16th Street	13,300	13,500
Palladay Road	6,400	9,100
Elwyn Avenue	3,100	11,700
Sorento Road	1,000	1,400
SR 70/99	1,400	2,700
Total Crossing County Line	33,700	67,200
Percent of Placer Vineyards Daily Trip Generation		34%
¹ Traffic forecasts reflect revised project description from the Partially Recirculated Revised Draft EIR		

The travel demand model does predict a substantial amount of project generated traffic crosses the Sacramento County line and reflects a realistic estimate of work trip end locations for workers from Placer County and the proposed project. Therefore, no adjustments to the traffic impact analysis appear to be warranted.

Response 35C: The commenter questions the transportation facility capacity assumptions used in the traffic analysis. As discussed in the Revised Draft EIR, The analysis of the No Project Alternative under Cumulative conditions assumed roadway improvements that are planned to be constructed by 2025, including all the new roadways and roadway improvements in the Placer County General Plan EIR, the Placer County CIP and the Metropolitan Transportation Plan (MTP) that would be implemented by 2025. The MTP does not include widening of SR 70/99 or SR 65. Therefore, the widening of these State highways was not assumed under cumulative conditions in the Revised Draft EIR.

Impact 4.7-19 (Revised Draft EIR page 4.7-85) indicates that the proposed project would result in increases in traffic volumes on portions of SR 70/99, SR 65 and I-80 that would operate at LOS F conditions without the proposed project. These increases in traffic volumes were considered a significant impact and Mitigation Measure 4.7-19b called for the proposed project to contribute its fair share toward widening portions of these state highways.

The commenter appears to be using the difference in traffic volumes for a scenario without the proposed project and traffic volumes for a scenario with the proposed project as a way to estimate the distribution of trips from the proposed project. As discussed in the Response to Comment 35B above, such a calculation does not provide an accurate distribution of project trips due to the estimated changes in travel patterns for non-project trips predicted by the travel demand model. As shown in the first [Table under Response to Comment 35B](#) (Comparison of Work Trip Distributions Placer County Travel Demand Model versus US Census Data), the number of proposed project trips that use a roadway segment usually exceeds the difference between traffic volumes with and without the proposed project.

The Revised Draft EIR indicates that substantial portions of the State highway system in the traffic impact study area (portions of Placer, Sacramento and Sutter counties) would operate at LOS F conditions under Cumulative (2025) conditions with or without the proposed project. Such traffic congestion could affect the travel demand model's estimated distribution of project traffic under cumulative conditions.

The commenter requests that the traffic impact analysis "be revised to more realistically reflect future State highway capacities for actual traffic demand on SR 65, SRs 70/99 and Interstate 80." A review of a travel model assignment of vehicle trips that have an origin or destination within the proposed project (see Response to Comment 35B above) indicates that 2025 congestion levels on the State highway system would significantly affect the amount of project generated traffic using only one portion of the State highway system: SR 70/99 between Riego Road and I-5. To help respond to this comment, new travel forecasts were conducted that revise the Cumulative No Project and Cumulative Plus Project scenarios to assume that SR 70/99 is widened to 6 lanes from Riego Road to I-5.

The Table below (Daily Traffic Volumes Crossing Sacramento County Line Related to Placer Vineyards) shows the estimated number project trips using roadway segments that cross the Sacramento/Placer County line as well as the calculated difference in traffic volumes between the Cumulative Plus Project scenario and the Cumulative No Project scenario with and without the widening a portion of SR 70/99 to 6 lanes. With or without this widening, a substantial amount of the traffic from the proposed project would use Elverta Road to access SR 70/99, not Riego Road. Therefore, The Table also shows the amount of project related trips use SR 70/99 south of Elverta Road.

Final EIR Table				
Daily Traffic Volumes Crossing Sacramento County Line Related to Placer Vineyards				
Streets	Volume Difference between Cumulative with Project and Cumulative No Project¹		Project Trips using Roadway under Cumulative with Project Conditions¹	
	SR 70/99 4 Lane	SR 70/99 6 Lane	SR 70/99 4 Lane	SR 70/99 6 Lane
Walerga Road	1,900	1,600	5,500	5,300
Watt Avenue	6,600	6,500	23,300	23,100
16th Street	13,300	13,000	13,500	13,300
Palladay Road	6,400	7,200	9,100	8,500
Elwyn Avenue	3,100	4,200	11,700	12,100
Sorento Road	1,000	1,100	1,400	1,500
SR 70/99	1,400	4,700	2,700	4,100
Total Crossing County Line	33,700	38,300	67,200	67,900
Percent of Placer Vineyards Daily Trip Generation			34%	35%
SR 70/99 south of Elverta Road	1,400	8,000	10,800	13,600

¹ Traffic forecasts reflect revised project description from the Partially Recirculated Revised Draft EIR

The travel demand model predicts that the widening of SR 70/99 would increase the amount of project generated trips using SR 70/99. However, for the various roadways crossing the county line, the difference in volumes between a 4-lane SR 70/99 and a 6 lane 70/99 are modest.

Improvements to SR 70/99, SR 65 and I-80 will be expensive and will likely require funding from a wide range of sources, including funds from future developments over wide areas. The Revised Draft EIR concludes that increases in traffic volumes on portions of SR 70/99, SR 65 and I-80 due to the proposed project is considered a significant impact and that the proposed project should contribute its fair share toward widening portions of these state highways. When determining the project's fair share, the analysis should not be based on the difference in traffic volumes for a scenario without the proposed project and traffic volumes for a scenario with the proposed project from a travel demand model. Following common practice, the proposed project's fair share should be determined by the percentage of project trips that use that portion of the State highway with the widening of the State highway assumed in the analysis. The Table below (Potential Calculation of Proposed Project's Fair Share Contribution Improvements to SR 70/99) demonstrates how the data from the Revised Draft EIR travel demand forecasts could be used to calculate a potential fair share contribution for improvements to SR 70/99.

The Table shows that if SR 70/99 remains 4 lanes, traffic on SR 70/99 south of Elverta Road is expected to increase by 58,200 daily vehicles or 143% by 2025 with the proposed project. The travel demand model used for the DEIR analysis estimates that 10,800 daily vehicles from the proposed project would use that segment of SR 70/99, which is 18.6 percent of the projected growth in traffic volume. Based on this representative calculation, the proposed project’s fair share of improvements to SR 70/99 would 18.6 percent.

If SR 70/99 is widened to 6 lanes, traffic on SR 70/99 south of Elverta Road is expected to increase by 83,600 daily vehicles or 192% by 2025 with the proposed project. The travel demand model estimates that 13,600 daily vehicles from the proposed project would use that segment of SR 70/99, which is 16.3 percent of the projected growth in traffic volume. Based on this representative calculation, the proposed project’s fair share of improvements to SR 70/99 would 16.3 percent.

Final EIR Table		
Potential Calculation of Proposed Project’s Fair Share Contribution		
Improvements to SR 70/99		
	Daily Volume of SR 70/99 South of Elverta Road¹	
	4 Lane SR 70/99	6 Lane SR 70/99
A) Existing	40,500	40,500
B) Cumulative with Project Condition	98,700	124,100
C) Growth (B-A)	58,200	83,600
D) Percent Increase	143%	192%
E) Project Traffic (see Table Z)	10,800	13,600
F) Project Traffic percent of Growth in Traffic (D/C)	18.6%	16.3%
¹ Traffic forecasts reflect revised project description from the Partially Recirculated Revised Draft EIR		

The calculations above are meant to illustrate how a project’s share of improvements to a State highway could be calculated. If regional impact fees are to be used to help fund improvements to a State highway, the assumptions and methodology used for that calculation would need to be worked out with all of the jurisdictions involved.

Response 35D: The County notes Caltrans’ three areas of disagreement with the Specific Plan’s proposed mitigation for traffic impacts on the State highway system, and responds as follows. First, Placer County has chosen to take the more conservative approach in the EIR of finding all project impacts on State highways “significant and unavoidable” if the improvements lie outside of the jurisdiction of Placer County. Although the Revised Draft EIR identifies mitigation measures that would reduce these impacts to a less than significant level (see Mitigation Measures 4.7-2a and 4.7-9b), these improvements lie outside the jurisdiction of Placer County, and thus cannot be guaranteed to occur – at least from the County’s standpoint. Although Caltrans may, as it states, have “procedures in place to facilitate the implementation of these mitigation measures,” until the County and Caltrans agree on the means of collecting and spending the project proponents’ funds, the physical improvements at issue cannot be guaranteed to occur. If, for whatever reason, the proposed mitigation measures, or equally effective measures, are not implemented, the roadway segments would continue to operate at an

unacceptable level. Thus, the County, as the CEQA lead agency acting in advance of its potential funding partners, has conservatively considered the project's impacts on State highways to be significant and unavoidable, at least at the present time and at the time when the Board of Supervisors will be asked to take action on the Placer Vineyards Specific Plan.

Second, the County disagrees that the phrase "if and when an appropriate fee mechanism has been adopted" (Revised Draft EIR, page 4.7-52) implies that the project is not responsible for its fair-share of improvements necessary to achieve acceptable service levels on the State highway segments identified in Table 4.7-24 of the Revised Draft EIR. This phrase does not relieve the Specific Plan of its fair-share responsibility for mitigating its traffic impacts. Rather, the language merely makes clear that a fair-share contribution by the project, and similar contributions from all other projects responsible for increasing congestion on these highway segments, will only be viable after an appropriate fee collection and expenditure mechanism is first established. As noted above, because County decision-makers will take action on the Specific Plan without knowing with certainty that the agreements contemplated by Mitigation Measure 4.7-2a, including the proposed agreement with Caltrans, will come to fruition, the language of both the measure and the EIR recognize that such success cannot be absolutely guaranteed.

Finally, the County believes that the establishment of an enforceable agreement between Caltrans and Placer County, consistent with State law and Placer County General Plan Policy 3.A.15, is a proper prerequisite to the County making the Specific Plan's fair share contributions, and all other project's fair share contributions, available to Caltrans (see Mitigation Measure 4.7-2a). Under the federal and State constitutions, the County cannot impose on the project proponents the obligation to mitigate impacts not attributable to their project. Thus, without the matching, reciprocal funds needed for certain improvements, the collection of fees from the project applicants would be an idle act. Although Caltrans has established methods in place to assist local agencies with the implementation of local development mitigation measures, until Placer County and Caltrans, as well as other local jurisdictions, establish one or more appropriate, enforceable agreements, the Specific Plan's impacts on the State highway system must be considered significant and unavoidable, as explained above. Without such an agreement or agreements, the mitigation measures identified in the Revised Draft EIR would be infeasible and the identified improvements would not be guaranteed to occur.

The key point here is that, in preparing both the Revised Draft EIR and the Partially Recirculated Revised Draft EIR, County staff devised a mitigation strategy that represents a good faith attempt to grapple with the challenges of imposing on a local development project the obligation to mitigate its ascertainable significant impacts on the state highway system. At present, the institutional and legal mechanisms for a flow of money from the applicants to the County and thence to Caltrans simply do not exist, and thus must be created. In considering the Specific Plan, the Board of Supervisors will determine whether, if it approves the Specific Plan, it will also adopt Mitigation Measure 4.7-2a. If the Board takes both such actions, the County will be legally bound to approach Caltrans with the intention of seeking an agreement by which the project can be made to mitigate its impacts on Caltrans' facilities.

Response 35E: The commenter believes that the Revised Draft EIR inadequately addresses traffic impacts on the State highway system. The Revised Draft EIR addresses impacts on State Highway mainline segments and intersections under both existing and cumulative conditions (see Impact 4.7-9 on pages 4.7-51 through 4.7-54, Impact 4.7-19 on pages 4.7-85 through 4.7-88 and the Supercumulative analysis on page 4.7-98). Also see Responses to Comments 35B and 35C.

Response 35F: The commenter points out that no regional fee program is in place and that the approach outlined in the EIR appears to be contrary to CEQA. See Response to Comment 35D.

Response 35G: The commenter disputes significant unavoidable impact findings for State highways. See Response to Comment 35D.

Response 35H: The commenter notes that Caltrans has mechanisms in place to work with other agencies to develop mitigation programs. See Response to Comment 35D.

Response 35I: The commenter requests that all work within a State highway right-of-way be performed in accordance with Caltrans' standards and under an encroachment permit. Comment noted. Although the project does not abut a State highway, certain offsite improvements will be required over time within State Highway right-of-ways for which the applicants will pay their fair share. It is not anticipated that the County or applicants would have direct involvement in State highway construction work. In the event this unlikely scenario was to occur, all work would be performed in accordance with Caltrans standards and be subject to an encroachment permit.

Response 35J: The commenter describes Caltrans requirements with regard to stormwater runoff and discharges to State highway right-of-ways. Comment noted. The project does not abut a State Highway or have any potential to discharge runoff to a State Highway (the nearest State highway is approximately 3 miles from the project site). A Master Project Drainage Study has been prepared for the project that will ensure that flows are contained onsite to the extent necessary to protect downstream properties (see Revised Draft EIR Section 4.3). As noted under Response to Comment 35I, it is not anticipated that the County or applicants would have direct involvement in any offsite State highway construction work. In the event this unlikely scenario was to occur, all work would be performed in accordance with Caltrans standards and be subject to an encroachment permit.

Response 35K: The commenter makes several recommendations regarding project landscaping. Comment noted. The project does not abut a State highway and project landscaping will have no effect on a State-owned facility. Caltrans' recommendations will be taken into consideration by the applicants and the County during final project landscape design.



Arnold Schwarzenegger
Governor

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



Sean Walsh
Director

September 15, 2006

RECEIVED

SEP 20 2006

ENVIRONMENTAL COORDINATION SERVICES

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

Subject: Placer Vineyards Specific Plan Revised Draft EIR (PEIR T200540651)
SCH#: 1999062020

Dear Lori Lawrence:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 13, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

A

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

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

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

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

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

Lead Agency Contact

Name Lori Lawrence
Agency Placer County Planning Department
Phone (530)745-3075 **Fax**
email
Address 11414 B Avenue
City Auburn **State** CA **Zip** 95603

Project Location

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

Proximity to:

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

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

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; California Highway Patrol; Caltrans, Division of Aeronautics; Department of Housing and Community Development; Caltrans, District 3; Native American Heritage Commission; Regional Water Quality Control Bd., Region 5 (Sacramento); State Water Resources Control Board, Clean Water Program

Date Received 07/31/2006 **Start of Review** 07/31/2006 **End of Review** 09/13/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

LETTER 36 TERRY ROBERTS, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

Response 36A: Comment noted. All letters received from the Clearinghouse on the Partially Recirculated Revised Draft EIR are included in Section Three and, in accordance with CEQA Guidelines Section 15088, written responses to all comments received are provided herein.

DEPARTMENT OF TRANSPORTATION

DISTRICT 3, SACRAMENTO AREA OFFICE

Venture Oaks -MS 15

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*Flex your power!
Be energy efficient!*

September 8, 2006

06PLA0024-A

SCH# 1999062020

Placer Vineyards Specific Plan

Notice of Availability (NOA)

Partially Recirculated Revised Draft Environmental Impact Report (PRR-DEIR)

06PLA80 PM 3.60

Mr. Paul Thompson, Principal Planner
Placer County Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

Dear Mr. Thompson:

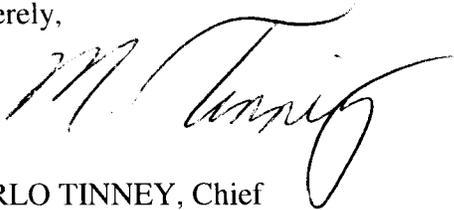
Thank you for the opportunity to comment on the Partially Recirculated Revised Draft EIR (PRR-DEIR) for the Placer Vineyards Specific Plan (PVSP). While this letter includes some issues that were outlined in our May 26, 2006 and September 1, 2006 comment letters, we consider all 3 letters independent and responsive to the documents they address. Our comments on the Partially Recirculated Revised Draft EIR are as follows:

- | | |
|---|---|
| <ul style="list-style-type: none"> • Given the changes in the PRR – DEIR, our previously stated comments, expressing concerns about the following major technical issues areas, are still valid: <ol style="list-style-type: none"> 1. Employment and housing location (Jobs / Housing balance) assumptions; 2. Roadway facility capacity assumptions; and, 3. Language regarding possible State Highway System (SHS) mitigation measures and procedures. | A |
| <ul style="list-style-type: none"> • Due to minor land use changes, the approximate number of daily trips, for both the 14,000 residential unit and the Blueprint alternatives, increases by approximately 1.5 percent and 0.25 percent respectively (195,246 and 243,567 trips). However, the distribution of SHS trips declined 37% in the PRR-DEIR from the previous DEIR. Please confirm that this decline is accurate. <ul style="list-style-type: none"> ○ Table 4.7-39, in the previous DEIR, showed an increase of 15,800 Average Daily Trips (ADT) on the SHS, or 8.2 percent of the total trips generated by the PVSP, which we estimate to be significantly less than expected. The PRR - DEIR includes an even lower SHS ADT increase of 9,900 or about 5.1 percent of the total PVSP trips. Our analysis indicates adjustments should be made to the methodology to produce a more realistic amount of trips on the State Highway System. | B |

- Caltrans looks forward to collaborating with Placer County to facilitate the implementation of traffic impact mitigation measures, and to formulate mutually legally agreeable mitigation language for this development. C
- We commend Placer County for their leadership in examining regional impact fee proposals, and for considering the SR 99/70 Riego Interchange fee in the PVSP Public Facilities Financing Plan recognizing cross-jurisdictional SHS impacts. D

If you have any questions regarding these comments, please contact me at (916) 274-0634; or Bob Justice, Placer County Planning Liaison, at (916) 274-0616.

Sincerely,



MARLO TINNEY, Chief
Office of Transportation Planning – East

c: State Clearinghouse
PCTPA

LETTER 37 MARLO TINNEY, DEPARTMENT OF TRANSPORTATION

Response 37A: The commenter reiterates previous expressed concerns that were addressed by County responses to Comment Letter 35. See Responses to Comments 35B, 35C and 35D.

Response 37B: The commenter notes that there has been a decline in State highway system trips under the Partially Recirculated Revised Draft EIR and requests confirmation of the analysis. The traffic volume forecasts in Table 4.7-39 in the Partially Recirculated Revised Draft EIR reflect several changes from those in the Revised Draft EIR including: 1) a revised project description, 2) a revised roadway network in Western Placer County and 3) a slight adjustment to the traffic volume coming from Yuba County to best reflect forecasts from SACOG. A comparison of Table 4.7-39 in the Revised Draft EIR to Revised Table 4.7-39 in the Partially Recirculated Revised Draft EIR indicates that the total volume on SR 70/99 under the Cumulative No Project scenario south of Riego Road is higher in the Partially Recirculated Revised Draft EIR. This segment of SR 70/99 would operate at LOS F under Cumulative No Project conditions. With a somewhat higher level of traffic congestion on SR 70/99 in the forecast for the Partially Recirculated Revised Draft EIR than the forecasts for the Revised Draft EIR, the model predicts that more project traffic would use local roads to avoid SR 70/99. It must be noted, however, that the model does predict that there are a substantial number of vehicle trips that have an origin or destination within the proposed project that would use SR 70/99.

The commenter appears to be using the difference in traffic volumes for the Cumulative No Project scenario and traffic volumes for the Cumulative Plus Project scenario as a way to estimate the distribution of trips from the proposed project. As discussed in Responses to Comments 35B and 35C, such a calculation does not provide an accurate distribution of project trips due to the estimated changes in travel patterns for non-project trips predicted by the travel demand model. Responses to Comments 35B and 35C use information from the Partially Recirculated Revised Draft EIR to show how a substantial amount of project-generated traffic would use SR 70/99. The information provided in those responses indicates that 34 percent of project-related traffic would use the roadways that cross the Sacramento County line under Cumulative Plus Project conditions. This information indicates that the percent of project-related traffic on the State Highway System is realistic and no adjustments are needed in the forecasting methodology used for the Partially Recirculated Revised Draft EIR.

Response 37C: The commenter expresses her agency's desire to collaborate with Placer County to implement traffic impact mitigation measures and to formulate legally agreeable mitigation language. Comment noted. Placer County has previously expressed its desire to work with Caltrans and looks forward to a positive outcome. Mitigation language acceptable to both parties can be worked out in the Agreement between them contemplated by Mitigation Measure 4.7-2a. See Response to Comment 35D.

Response 37D: Commenter recognizes Placer County for its leadership in examining regional impact fee proposals. The comment is acknowledged and appreciated. Like Caltrans, the County recognizes that congestion on the region's highway system presents a multi-jurisdictional challenge requiring creative problem-solving by all affected planning agencies.



SUTTER COUNTY
COMMUNITY SERVICES DEPARTMENT

Animal Control
Building Inspection
Emergency Services
Environmental Health
Fire Services
Planning

Rich Hall, Director
Larry Bagley, Assistant Director,
Permitting Services
Chuck Vanevenhoven,
Fire Services
John DeBeaux,
Emergency Services

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ENVIRONMENTAL COORDINATION SERVICES

September 6, 2006

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

Re: Placer Vineyards Specific Plan Partially Recirculated Revised Draft Environmental Impact Report (EIR)

Dear Ms. Lawrence:

Sutter County thanks you for the opportunity to review and comment on the partially recirculated Revised Draft Environmental Impact Report (EIR) for the Placer Vineyards Specific Plan. After reviewing the document Sutter County has the following comments.

Chapter Two, Section 4.7 "Transportation and Circulation Existing Plus Project Conditions:

- | | |
|--|---|
| <p>1. (Section 4.7-8) The project causes the three intersections of Natomas Road, Pleasant Grove Road (North and South) to go from an existing Level of Service (LOS) of "C, D" to an "F" in the PM peak hour (Table 4.7-23). Sutter County recommends that mitigation be incorporated into the project to signalize these intersections. The applicant should pay 100 percent of the cost of this signalization because it is the project that triggers the need for these signals.</p> | A |
| <p>2. (Section 4.7-8) The addition of three new signals into a remote area of Sutter County will impose a significant maintenance and operation burden upon the County. As such, it is recommended that the applicant pursue a maintenance district of some form to pay for or contract with the county for continuous maintenance and operation of the signals until such time as future Sutter County development comes on line to take over the operation and maintenance of the traffic signals.</p> | B |

3. (Section 4.7-8) The revised document has not analyzed the safety issues and impacts associated with the existing railroad crossing on Riego Road. The proposed project will add 4,100 ADT (a 45% increase over existing) to the Riego Road/Union Pacific railroad intersection. An analysis needs to be completed to determine whether the cumulative impacts of the project trigger the need for a grade separation of Riego Road.

According to the California Public Utilities Commission, The Federal Highway Administration's Technical Working Group published a document in November 2002 entitled Guidance on Traffic Control Devices at Highway-Rail Grade Crossings. This document is available online at: <http://safety.fhwa.dot.gov/media/twgreport.htm>. On pages 27 and 33, the document discusses particular criteria that should be considered when assessing the need for grade separation. When considering the need for grade separation of highway-rail crossings, it may be appropriate to use the Federal Railroad Administration's web-based tool "GradeDec.net". The software application, accessible at <http://gradedec.fra.dot.gov>, can be used to evaluate the benefits and costs of rail investment projects, specifically those involving highway-rail grade crossing improvements (including grade separation, closure, or warning device upgrades), within a risk analysis framework."

C

4. (Sections 4.7-7,8,9) The document analyzed AM peak hour conditions in Sacramento County but failed to analyze this in Sutter County. In addition, the document did not analyze the AM peak hour impacts upon Riego Road and State Highway 99. Sutter County believes this is a significant oversight in the traffic analysis. The current traffic congestion on Riego Road is currently significant and will only increase in the future in the AM. Sutter County recommends that an AM peak hour analysis be completed, and mitigation proposed to mitigate any impacts.

D

5. (Revised Table 4.7-22) Riego Road needs to be upgraded to safely handle 14,000 ADT that the project proposes including the installation of paved shoulders, left turn bays at every intersection, traffic signals at intersections meeting signal warrants, etc. The applicant should pay its fair-share of bringing the road up to standards so it can safely carry the forecasted traffic volumes from the project. According to Table 4.7-22 of the document, they should pay for $4,100/9,900 = 41$ percent of this cost because the project will increase existing traffic levels by this amount. According to the document's capacity analysis, the project does not cause a significant impact. Sutter County strongly disagrees with this determination and believes that a significant impact will result.

E

Cumulative Plus Project (4.7-17)

<p>6. The revised document assumes 50 percent of Sutter County's Measure "M" area is built-out as well as the Riego Road/Highway 99 Interchange, and that Riego Road has 6 lanes. It is important to note that Measure M (Sutter Pointe Specific Plan) is not a part of the Sutter County General Plan and is not an approved project. Sutter County believes that assuming the build-out of the Sutter Pointe Specific Plan is faulty because it assumes Sutter Pointe is an approved project and assumes that project will pay for certain infrastructure costs. Sutter County recommends the document be revised to reflect the project fully mitigating its impacts upon Sutter County and not assuming Sutter Pointe has been approved.</p>	<p>F</p>
<p>7. The revised document shows the Riego Road interchange with State Highway 99 operating satisfactorily in the PM peak hour but the document fails to analyze the AM peak hour. As previously stated, this type of analysis was conducted for intersections in Sacramento County but not Sutter. As a result, additional analysis should be completed and any identified impacts upon Sutter County should be fully mitigated for.</p>	<p>G</p>
<p>8. The revised project will result in the PM peak hour LOS at Pleasant Grove Road (North and South) deteriorating from an LOS of "E" to "F". Their recommended mitigation is the installation of dual left turn lanes on both side streets (mitigation 4.7-18b). Sutter County believes the project should pay the full cost of these improvements because it is the proposed project that necessitates these improvements.</p>	<p>H</p>
<p>9. The revised project will add more average daily traffic to State Highway 99/70 south of Riego Road (Table 4.7-39). This will worsen the existing LOS "F" conditions on the State Highway. Appendix Z of the revised document suggests the section of the State Highway between Riego Road and Elkhorn Boulevard be widened and the fair-share cost estimated. It is unclear to us why they are recommending mitigation of only the portion of the State Highway north of Elkhorn Boulevard since it is likely the one-mile stretch of highway between Interstate 5 and Elkhorn Boulevard would be equally congested and equally impacted but fails to incorporate such mitigation on that portion of the Highway in Sutter County. All impacts resulting from the project upon Sutter County must be fully mitigated for and paid for by the Placer Vineyards development.</p>	<p>I</p>

Super Cumulative Plus Project

10. The revised document failed to alter the super-cumulative plus project analysis or conclusions. The document states the project will account for approximately two full freeway lanes of traffic each direction (Table 4.7-48). Sutter County believes the development should pay for the construction of two additional full freeway lanes each direction on State Highway 99/70 between Sankey Road and Interstate 5.

J

In summary, the topics discussed above remain of paramount concern to Sutter County. We will not accept unmitigated project impacts as a result of this project. The partially recirculated Revised Draft Environmental Impact Report does not reduce the impacts identified above through mitigation to levels which are less than significant. For these reasons, the project should be revised and recirculated for further public comment. Please provide our office with all future notices regarding this project.

K

Sincerely,



Doug Libby, AICP
Senior Planner

DL:se

cc: Al Sawyer, Sutter County Assistant Public Works Director

LETTER 38 DOUG LIBBY, SUTTER COUNTY COMMUNITY SERVICES DEPARTMENT

Response 38A: As explained in the Partially Recirculated Revised Draft EIR, pursuant to CEQA Guidelines Section 15088.5, subdivision (f)(2), Placer County, in preparing the Final EIR, is only required to respond to comments received during the recirculation period for the Partially Recirculated Revised Draft EIR that relate to the chapters or portions of the Revised Draft EIR that were revised and recirculated. The Partially Recirculated Revised Draft EIR specifically provided, “[t]he partial recirculation is not an opportunity to re-submit comments on previously published topics, or add additional comments on previously published topics” (Partially Recirculated Revised Draft EIR, pages 1-14 to 1-15). The Partially Recirculated Revised Draft EIR cautioned readers not to submit comments on issues not directly implicated by the Partially Recirculated Revised Draft EIR (Partially Recirculated Revised Draft EIR, page 1-15). Although CEQA does not require the County to respond to comments on the Partially Recirculated Revised Draft EIR that address topics not covered in the partially recirculated document, the County is nevertheless responding to such comments for purposes of informational disclosure.

The commenter requests that three intersections in Sutter County be signalized and that the applicant pay 100% of the cost of the signalization. Mitigation Measure 4.7-8b (Revised Draft EIR, pages 4.7-50 and 4.7-51) provides for the requested signalization. In addition, Figure 3-16 of the Revised Draft EIR shows the three intersections signalized as part of the Backbone Roadway Improvements. Because they would be installed as part of the Backbone Roadway Improvements, this means that they would be fully funded by the applicants. To the extent that other future development benefits from the improvements made by Placer Vineyards project proponents, it would be reasonable for Sutter County to require others to contribute their fair share as development occurs in the area and to partially reimburse the Placer Vineyards project proponents. Because the signals can be considered a part of the project, Mitigation Measure 4.7-8b as currently written may lead to confusion and is hereby rewritten as follows:

4.7-8b *Consistent with Mitigation Measure 4.7-2a and Revised Draft EIR Figure 3-16 Mitigation Measure 4.7-2a, the proposed project shall ~~contribute its fair share toward~~ construct the following improvements in Sutter County:*

1. *Install a signal at the intersection of Riego Road and Natomas Road to provide LOS “B” (V/C 0.62).*
2. *Install a signal at the intersection of Riego Road and Pleasant Grove Road (North) to provide LOS “B” (V/C 0.64).*
3. *Install a signal at the intersection of Riego Road and Pleasant Grove Road (South) to provide LOS “C” (V/C 0.74).*

While implementation of this mitigation measure would reduce this impact to a less than significant level, these improvements lie outside the jurisdiction of Placer County. Sutter County may implement the suggested or similar mitigation measures, but may choose not to. If the

identified improvements are not made, the intersections would operate at an unacceptable level; therefore, this impact is considered significant and unavoidable.

Response 38B: The commenter requests that the applicant create a funding mechanism for the maintenance and operational costs of the proposed new signals. While the need for installation of the signals is triggered by the project, the signals are a general safety enhancement that, once installed, benefits all members of the public utilizing this section of roadway, and would not be the sole responsibility of the project. Notwithstanding the foregoing, the County will consider whether to include a temporary component for signal maintenance in the budget of any funding mechanism that is created by the County to maintain roads in the Specific Plan area in order to reimburse Sutter County for a share of the maintenance costs when such mechanism is put in place.

Response 38C: As explained in the Partially Recirculated Revised Draft EIR, pursuant to CEQA Guidelines Section 15088.5, subdivision (f)(2), Placer County, in preparing the Final EIR, is only required to respond to comments received during the recirculation period for the Partially Recirculated Revised Draft EIR that relate to the chapters or portions of the Revised Draft EIR that were revised and recirculated. The Partially Recirculated Revised Draft EIR specifically provided, “[t]he partial recirculation is not an opportunity to re-submit comments on previously published topics, or add additional comments on previously published topics” (Partially Recirculated Revised Draft EIR, pages 1-14 to 1-15). The Partially Recirculated Revised Draft EIR cautioned readers not to submit comments on issues not directly implicated by the Partially Recirculated Revised Draft EIR (Partially Recirculated Revised Draft EIR, page 1-15). Although CEQA does not require the County to respond to comments on the Partially Recirculated Revised Draft EIR that address topics not covered in the partially recirculated document, the County is nevertheless responding to such comments for purposes of informational disclosure.

Commenter states that the EIR has not analyzed safety issues and impacts associated with the existing railroad crossing on Riego Road. This condition did not change between publication of the Revised Draft EIR and the Partially Recirculated Revised Draft EIR; therefore, the comment is not a comment based on new information presented in the Partially Recirculated Revised Draft EIR. As noted by the commenter, Revised Table 4.7-22 in the Partially Recirculated Revised Draft EIR shows that Riego Road east of SR 70/99 was estimated to carry 14,000 daily vehicles under Existing Plus Project conditions, which is 4,100 vehicles per day more than the existing volume of 9,900 daily vehicles. This traffic volume represents about 78 percent of the typical 18,000 daily vehicle capacity of a two-lane arterial roadway. Riego Road would achieve this capacity if its multi-way stop-sign controlled intersections were signalized.

As noted by the commenter, FHWA’s “Guidance on Traffic Control at Highway-Rail Grade Crossings” has criteria for the consideration of grade separations. One of those criteria is an average annual traffic volume (AADT) of 100,000 daily vehicles in an urban area and 50,000 in a rural area. Another criterion is a “crossing exposure” (the product of the number of trains per day and AADT) of 1,000,000 in an urban area and 250,000 in a rural area. With a projected daily volume of 14,000 daily vehicles in an urbanizing area, these criteria would not be met.

The Federal Railroad Administration's web-based tool "Gradedec.net" allows a user to analyze benefits and costs of a grade separation to help prioritize investments in grade crossing improvements. It does not provide thresholds for when a grade separation should be implemented due safety issues. The existing railroad crossing on Riego Road is controlled by gates and warning lights, which is an appropriate and safe type of control for a railroad crossing of a two-lane roadway with a daily volume of 14,000 daily vehicles. There is no indication that there has been a safety problem at this crossing.

Based on this analysis, the proposed project does not appear to add sufficient volume to meet the criteria for installation of a railroad grade separation on Riego Road.

Response 38D: As explained in the Partially Recirculated Revised Draft EIR, pursuant to CEQA Guidelines Section 15088.5, subdivision (f)(2), Placer County, in preparing the Final EIR, is only required to respond to comments received during the recirculation period for the Partially Recirculated Revised Draft EIR that relate to the chapters or portions of the Revised Draft EIR that were revised and recirculated. The Partially Recirculated Revised Draft EIR specifically provided, "[t]he partial recirculation is not an opportunity to re-submit comments on previously published topics, or add additional comments on previously published topics" (Partially Recirculated Revised Draft EIR, pages 1-14 to 1-15). The Partially Recirculated Revised Draft EIR cautioned readers not to submit comments on issues not directly implicated by the Partially Recirculated Revised Draft EIR (Partially Recirculated Revised Draft EIR, page 1-15). Although CEQA does not require the County to respond to comments on the Partially Recirculated Revised Draft EIR that address topics not covered in the partially recirculated document, the County is nevertheless responding to such comments for purposes of informational disclosure.

The commenter requests an A.M. peak hour analysis for Sutter County. An A.M. peak hour analysis was not included in the Revised Draft EIR for the reasons discussed in Response to Comment 15EE. Therefore, the comment is not a comment based on new information presented in the Partially Recirculated Revised Draft EIR. A letter requesting input on the analysis was sent to Sutter County early in the EIR process, but Sutter County did not respond (see Appendix FEIR-C). However, based on Sutter County's recent request, an A.M. analysis has been performed.

The A.M. analysis under Existing Plus Project Conditions indicates that all of the study intersections would operate at LOS F during the A.M. peak hour. Therefore, the bullets on page 4.7-50 of the Revised Draft EIR are revised as shown:

- a. **Level of Service at the intersection of Riego Road and Natomas Road would degrade from LOS "C" to LOS "F" in the A.M. and P.M. peak hours.**
- b. **Level of Service at the intersection of Pleasant Grove Boulevard (North) and Riego Road would degrade from LOS "D" to LOS "F" in the A.M. peak hour and LOS "C" to LOS "F" in the P.M. peak hour.**

- c. **Level of Service at the intersection of Pleasant Grove Boulevard (North) and Riego Road would degrade from LOS “D” to LOS “F” in the A.M. and P.M. peak hours.**
- d. **Level of Service at the intersection of Highway 77/99 and Riego Road would operate at LOS “F” in the A.M. peak hour and would further degrade.**

Three of these intersections would operate at LOS F in the P.M. peak hour as well, as shown in Table 4.7-23 of the Revised Draft EIR. These three intersections would operate at acceptable levels with the implementation of Mitigation Measure 4.7-8 on pages 4.7-50 and 4.7-51 of the Revised Draft EIR, which calls for the installation of signals. The intersection of Highway 70/99 with Riego Road, which would operate at an acceptable service level in the P.M. peak hour, would exacerbate LOS F in the A.M. peak hour under both the Existing and Existing plus Project conditions. In order to offset the project impact at this intersection, the following item is added to Mitigation Measure 4.7-8b on page 4.7-51 of the Revised Draft EIR:

4. Construct third northbound and southbound through lanes (2,000 to 3,000 feet long) to provide LOS “F” (delay of 66.1 seconds)

Or

Construct the Highway 77/99 interchange at Riego Road.

As stated on page 4.7-33 of the Revised Draft EIR, an interchange is included in the SACOG Metropolitan Transportation Plan (MTP), and is assumed to be in place under cumulative conditions. Sutter County and Caltrans could choose either construction of additional lanes at the existing intersection of Riego Road/Highway 99 or the interchange in order to improve conditions at the Riego Road/Highway 99 intersection. The project would pay its fair share toward either of these improvements.

As shown in Table 6-18a, A.M. peak hour conditions would be similar under the Blueprint Alternative, although there would be more congestion than under the proposed project. The bullets on page 6-84 of the Revised Draft EIR are revised as shown:

- a. **Level of Service at the intersection of Riego Road and Natomas Road would degrade from LOS “C” to LOS “F” in both the AM and PM peak hour.**
- b. **Level of Service at the intersection of Pleasant Grove Boulevard (North) and Riego Road would degrade from LOS “D” to LOS “F” in the AM peak hour and LOS “C” to LOS “F” in the PM peak hour.**
- c. **Level of Service at the intersection of Pleasant Grove Boulevard (South) and Riego Road would degrade from LOS “D” to LOS “F” in both the AM and PM peak hour.**

- d. **Level of Service at the intersection of Highway 77/99 and Riego Road would operate at LOS “F” in the A.M. peak hour and would further degrade.**

With the addition of the following item, Mitigation Measure 4.7-8b would also improve conditions at the intersection of Riego Road and Highway 99:

- Construct third northbound and southbound through lanes (2,000 to 3,000 feet long) and a third westbound left turn lane to provide LOS “F” (delay of 74.4 seconds):

Or

- Construct the Highway 99 interchange at Riego Road.

Under either the proposed project or the Blueprint Alternative, the impact on intersections in Sutter County would be significant and unavoidable, because Placer County cannot ensure that the mitigation measure is implemented (see page 4.7-50).

As shown in Table 4.7-38A below, the two Sutter County intersections that would operate at unacceptable levels under A.M. Cumulative Plus Project Conditions were already identified as operating at LOS “F” under P.M. Cumulative Plus Project Conditions. In order to reflect the A.M. analysis, the bullets on page 4.7-84 are revised as shown:

- a. **Level of Service at the intersection of Pleasant Grove Road (North) and Riego Road would degrade from LOS “D” to LOS “E” in the A.M. peak hour and LOS “E” to LOS “F” in the P.M. peak hour.**
- b. **Level of Service at the intersection of Pleasant Grove Road (South) and Riego Road would degrade from LOS “D” to LOS “F” in the A.M. peak hour “LOS “E” to LOS “F” in the P.M. peak hour.**

Mitigation Measure 4.7-18b would result in acceptable service levels under both the A.M. and P.M. conditions, so no revision to the measure is needed to address A.M. conditions.

Under the Blueprint Alternative, cumulative A.M. peak hour conditions would be similar to the proposed project, only more congested (see Table 6-32A below. Therefore, the bullets on page 6-110 of the Revised Draft EIR are revised as shown:

- a. **Level of Service at the intersection of Pleasant Grove Road (North) and Riego Road would degrade from LOS “E” to LOS “F” in the P.M. peak hour.**
- b. **Level of Service at the intersection of Pleasant Grove Road (South) and Riego Road would degrade from LOS “D” to LOS “F” in the A.M. peak hour and “LOS “E” to LOS “F” in the P.M. peak hour.**

As with the proposed project, Mitigation Measure 4.7-18 would reduce the impact on Sutter County intersections to a less-than-significant level under either A.M. or P.M. peak hour conditions. However, as discussed on page 4.7-85, Placer County cannot ensure that these improvements are implemented, so the impact would remain significant and unavoidable.

Table 4.7-23A

**A.M. Peak Hour Levels of Service at Study Intersections – Sutter County
Existing Plus Project Conditions**

Intersection		Existing Conditions			Existing Plus Project Conditions		
North-South Roadway	East-West Roadway	Level of Service	LOS Criteria		Level of Service	LOS Criteria	
			Signalized Intersection (Delay)	Unsignalized Intersection (Delay)		Signalized Intersection (Delay)	Unsignalized Intersection (Delay)
1 Hwy 70/99	Riego Road	F	86.2		F	123.0	
2 Natomas Road	Riego Road	C (F) ¹		18.1 (>50) ¹	F		67.7
3 Pleasant Grove Rd. (North)	Riego Road	D (F) ¹		26.5 (>50) ¹	F		115.6
3 Pleasant Grove Rd. (South)	Riego Road	D (F) ¹		31.4 (>50) ¹	F		118.6

Note: Intersection number refers to Figure 4.7-8.
¹ Observed delay greater than calculated delay.
Source: DKS Associates, 2006.

Table 6-18A

**A.M. Peak Hour Levels of Service at Study Intersections – Sutter County
Existing Plus Blueprint Conditions**

Intersection		Existing Conditions			Existing Plus Blueprint Conditions		
North-South Roadway	East-West Roadway	Level of Service	LOS Criteria		Level of Service	LOS Criteria	
			Signalized Intersection (Delay)	Unsignalized Intersection (Delay)		Signalized Intersection (Delay)	Unsignalized Intersection (Delay)
1 Hwy 70/99	Riego Road	F	86.2		F	157.8	
2 Natomas Road	Riego Road	C (F) ¹		18.1 (>50) ¹	F		191.8
3 Pleasant Grove Rd. (North)	Riego Road	D (F) ¹		20.9 (>50) ¹	F		225.7
4 Pleasant Grove Rd. (South)	Riego Road	D (F) ¹		31.4 (>50) ¹	F		325.7

Note: Intersection number refers to Figure 4.7-8.
¹ Observed delay greater than calculated delay.
Source: DKS Associates, 2006.

Table 4.7-38A							
A.M. Peak Hour Levels of Service at Study Intersections – Sutter County							
Cumulative Plus Project Conditions							
Intersection		Cumulative No Project Alternative			Cumulative Plus Project Conditions		
North-South Roadway	East-West Roadway	Level of Service	LOS Criteria		Level of Service	LOS Criteria	
			Signalized Intersection (V/C Ratio)	Signalized Intersection (Delay)		Signalized Intersection (V/C Ratio)	Signalized Intersection (Delay)
1A Hwy 70/99 SB	Riego Rd	A		3.2	A		6.3
1B Hwy 70/99 NB	Riego Rd	A		6.7	A		6.0
3 Pleasant Grove Rd (North)	Riego Rd	D	0.89		E	0.95	
4 Pleasant Grove Rd (South)	Riego Rd	D	0.89		F	1.02	

Note: Intersection numbers refer to Figure 4.7-8. Significant impacts are highlighted in bold letters
Source: DKS Associates, 2006

Table 6-32A							
A.M. Peak Hour Levels of Service at Study Intersections – Sutter County							
Cumulative Plus Blueprint Conditions							
Intersection		Cumulative No Project Alternative			Cumulative Plus Blueprint Conditions		
North-South Roadway	East-West Roadway	Level of Service	LOS Criteria		Level of Service	LOS Criteria	
			Signalized Intersection (V/C Ratio)	Signalized Intersection (Delay)		Signalized Intersection (V/C Ratio)	Signalized Intersection (Delay)
1A Hwy 70/99 SB	Riego Rd	A		3.2	A		7.2
1B Hwy 70/99 NB	Riego Rd	A		6.7	A		6.0
3 Pleasant Grove Rd (North)	Riego Rd	D	0.89		D	0.90	
4 Pleasant Grove Rd (South)	Riego Rd	D	0.89		F	1.01	

Note: Intersection numbers refer to Figure 4.7-8. Significant impacts are highlighted in bold letters
Source: DKS Associates, 2006

Response 38E: The commenter states that Riego Road will need to be upgraded to accommodate project traffic and that the Placer Vineyards Specific Plan project proponents should pay for the upgrades. Riego Road is shown to operate at acceptable levels under both existing and cumulative conditions. The proposed project proposes to signalized and construct additional improvements at the Riego Road/Pleasant Grove Road and Riego Road/East Natomas Road as part of the project. These improvements would provide an acceptable level of service on Riego Road under Existing Plus project conditions and thereby accommodate 14,000 vehicles per day. The proposed project does not cause a significant impact due to the provision of these improvements as part of the proposed project. Roadway volumes on Riego Road already justify shoulders, even without the project. However, meeting design standards is not a standard of significance use in the EIR or in CEQA Guidelines Appendix G. Sutter County does not provide any evidence that this would be a significant impact that should have been addressed in EIR.

Response 38F: The commenter disagrees with assumptions made by Placer County for buildout of Sutter County's Measure "M" area. The assumptions were not changed between publication of the Revised Draft EIR and the Partially Recirculated Revised Draft EIR; therefore, the comment is not a comment based on new information presented in the Partially Recirculated Revised Draft EIR (see Response to Comment 38A, first paragraph). As background, Placer County and the project proponents made more than one attempt to elicit reasonable buildout assumptions for the Measure "M" area from Sutter County personnel, but were advised that the County did not have an opinion on the subject. It was suggested by Sutter County staff that Placer County address the question to those developing the Sutter Pointe Specific Plan. This was in fact done and the assumptions contained in the Revised Draft EIR reflect those discussions and other forecasts for the region, in particular, those prepared by SACOG. To assume no growth in South Sutter County, as now suggested, would be inconsistent with regional plans and projections, and with the intent of Sutter County voters when Measure "M" was approved. A partial buildout scenario is consistent with the approach taken for growth projected in the City of Roseville and is a reasonable assumption absent other hard data. To assume no growth in Sutter County would have ramifications beyond the subject of roadway impact mitigation fees and would understate probable future cumulative impacts on a variety of resources in Sutter County and elsewhere and would not be a prudent and defensible position for Placer County to take. Even so, as Placer and Sutter Counties move forward in the future to address traffic impacts occurring within both jurisdictions (see Mitigation Measure 4.7-2a, opportunities will arise to adjust assumptions and cost assignments as events unfold. Also see Response to Comment 45A.

Response 38G: The commenter requests that an A.M. analysis of be performed. See Response to Comment 38D.

Response 38H: The commenter wants the applicants to pay the full cost of improvements to Pleasant Grove Road intersections under cumulative conditions. The comment is not a comment on the Partially Recirculated Revised Draft EIR (see Response to Comment 38A, first paragraph); however Mitigation Measure 4.7-18b (Revised Draft EIR, page 4.7-85) does provide for the applicants to contribute their fair share toward improvement of the subject intersections. Unless Sutter County can supply the County with data showing that full funding would be proportional to the project's level of impacts on the affected intersections (see CEQA Guidelines, Section 15126.4, subd. (a)(4) and case law cited therein), the County cannot lawfully require the applicants to pay the full cost of the intersection improvements. The County's cumulative analysis, reflecting not only adopted plans but also expert projections of long-term demographic and market trends, shows that the project will create only part of the need for these intersections, with the result that only a "fair share" contribution is required. Other anticipated development, including Measure "M" development, will also contribute to the cumulative impacts that are the subject of this mitigation measure.

If, at the time the intersection improvements are actually required, the Measure M development no longer appears foreseeable (e.g., because the proposed South Sutter development has been rejected by the Sutter County Board of Supervisors), fair share contributions may have to be recalculated. In making such new calculations, Placer County and Sutter County, pursuant to the agreement contemplated by Mitigation Measure 4.7.2a, would use their best collective judgment

regarding cumulative development levels as they appear at the time. See also Response to Comment 38F.

Response 38I: The commenter notes that the Partially Recirculated Revised Draft EIR does not require a fair share contribution to the widening of State Highway 70/99 south of Elkhorn Boulevard. Comment noted. Although the Partially Recirculated Revised Draft EIR did not explicitly identify the Highway 70/99 segment south of Elkhorn Boulevard, the commenter is correct in his conclusion that the project should contribute to the funding of that segment. The issue is addressed by Impact 4.7-19 (Buildout of the Specific Plan under Cumulative Plus Project conditions would increase peak hour traffic volumes on study area roadways that are part of the State highway system). The full length of State Highway 70/99 to I-5 was intended to be included in the fair share mitigation. Mitigation Measure 4.7-19b is therefore modified as follows to correct this oversight:

4.7-19b *Consistent with Mitigation Measure 4.7-2a, the proposed project shall contribute its fair share toward the following improvements on State highways.*

1. *Widen Hwy 70/99 to six lanes from Riego Road to ~~Elkhorn Boulevard~~ Interstate 5.*
2. *Widen Hwy 65 to six lanes from Blue Oak Boulevard to Galleria Boulevard.*
3. *Widen Interstate 80 to twelve lanes from Longview Drive to Watt Avenue.*
4. *Widen Interstate 80 to ten lanes from Antelope Road to Douglas Boulevard.*
5. *Consider construction of additional lanes on Interstate 80 from Auburn Boulevard to Madison Avenue or other improvements.*

Response 38J: The commenter requests mitigation for Highway 99 under the Supercumulative analysis. Table 4.7-48 compares the Cumulative Plus Project scenario to the Super-Cumulative Plus Project scenario. This table does not show how the proposed project would increase volumes. The data presented in the Supercumulative analysis is for the reader's information only in order to provide a potential long-range scenario. No mitigation is provided for any roadway facility under the analysis. For the County to attempt to do so would be pure speculation given the timeframe.

Response 38K: The commenter is concerned about unmitigated project impacts and requests recirculation of the EIR. The commenter has not identified a new significant impact or a substantial increase in the severity of a previously identified significant impact sufficient to warrant recirculation. Notably, the Partially Recirculated Revised Draft EIR is the third environmental document for the project subjected to full formal public review, with the

solicitation of written comments and the preparation of detailed responses to comments. The County believes it has gone well beyond the call of legal duty in seeking out public input on the project, and need not undertake a fourth round of such formal public input. The commenter, moreover, is encouraged to testify at the hearings on the project before the Board of Supervisors if he has any additional input on the project. Also, see Response to Comment 13C.

August 8, 2006

Gina Langford, Environmental Coordinator
County of Placer
Community Development Resource Agency
3091 County Center Drive #280
Auburn, CA 95603

Re: Placer Vineyards Specific Plan Revised Draft EIR; PEIR T200540651

Dear Ms Langford

I am requesting information relating to the increased amount of seasonal runoff that will be generated and flow through our property that is located immediately south of this proposed specific plan. I am concerned about the impact(s), flooding, and traffic, that the upstream development will have on our property. As a result of the Placer Vineyards project I am concerned that inadequate mitigation measures will cause damage to our property and the value of our property. I have not commented on the EIR but feel that the impacts may be significant enough and the mitigation measures inadequate. Our Sacramento County Assessor's parcel number is 202-070-26. Is the EIR for this project on the Web? If the project is not on the web I am requesting a copy of the EIR to review to determine the impacts it may have on our property.

A

B

Sincerely,



Mark Pheatt
8846 Palladay Road
Elverta, CA 95626

916 992-1527

LETTER 39 MARK PHEATT

Response 39A: As explained in the Partially Recirculated Revised Draft EIR, pursuant to CEQA Guidelines Section 15088.5, subdivision (f)(2), Placer County, in preparing the Final EIR, is only required to respond to comments received during the recirculation period for the Partially Recirculated Revised Draft EIR that relate to the chapters or portions of the Revised Draft EIR that were revised and recirculated. The Partially Recirculated Revised Draft EIR specifically provided, “[t]he partial recirculation is not an opportunity to re-submit comments on previously published topics, or add additional comments on previously published topics” (Partially Recirculated Revised Draft EIR, pages 1-14 to 1-15). The Partially Recirculated Revised Draft EIR cautioned readers not to submit comments on issues not directly implicated by the Partially Recirculated Revised Draft EIR (Partially Recirculated Revised Draft EIR, page 1-15). Although CEQA does not require the County to respond to comments on the Partially Recirculated Revised Draft EIR that address topics not covered in the partially recirculated document, the County is nevertheless responding to such comments for purposes of informational disclosure.

The commenter is concerned about flooding and traffic impacts to his property in Sacramento County. The Revised Draft EIR contains a complete discussion of potential flooding impacts (Section 4.3.2), including impacts to Sacramento County. Of particular note is the discussion following Impact 4.3.2-1 on Revised Draft EIR page 4.3-19. The commenter is also referred to Responses to Letter 4 (County of Sacramento Department of Water Resources) contained in this Final EIR. A complete Master Project Drainage Study has been prepared for the project and any potential impacts to property in Sacramento County have been fully mitigated or dealt within accordance with existing regulations and policy.

Traffic impacts are also covered for the Sacramento County area in both the Revised Draft EIR (Section 4.7) and the Partially Recirculated Revised Draft EIR. Specifically the commenter is referred to the discussion and mitigation measures following Impact 4.7-5 (Buildout of the Specific Plan area would increase daily traffic volumes on study area roadways in Sacramento County), Impact 4.7-6 (Buildout of the Specific Plan area would increase peak hour traffic volumes on study area intersections in Sacramento County), Impact 4.7-15 (Buildout of the Specific Plan under Cumulative Plus Project conditions would increase daily traffic volumes on study area roadways in Sacramento County), and Impact 4.7-16 (Buildout of the Specific Plan area under Cumulative Plus Project conditions would increase peak hour traffic volumes on study area intersections in Sacramento County). Traffic-related impacts on Sacramento County are proposed to be mitigated to the maximum extent feasible; however, ultimate responsibility for implementation of the various measures will require action on the part of Sacramento County.

Response 39B: The commenter asks if the EIR is on the County’s web site and if not, a hard copy is requested. Both the Revised Draft EIR and the Partially Recirculated Revised Draft EIR are on the County’s web site:

www.placer.ca.gov/CommunityDevelopment/Planning/EnvDocs.

From: KAY PHELAN <pkp2742@comcast.net>
To: <jjlawren@placer.ca.gov>
Date: 8/10/2006 11:52:05 AM
Subject: Placer Vineyards

To Whom It May Concern;

Please consider the impact of traffic on Watt Ave., P.F.E., and Baseline. These roads are already heavily used and in need of repair and widening. The influx of people and cars should be taken into consideration before allowing more building.

A

LETTER 40 KAY PHELAN

Response 40A: Commenter requests that the County consider traffic impacts on Watt Avenue, PFE Road and Baseline Road. A full traffic study has been prepared for the project, as reported in Section 4.7 of the Revised Draft EIR and in the Partially Recirculated Revised Draft EIR. The traffic studies specifically took into account impacts to the roadways identified by the commenter. All of the roadways will be widened to accommodate the increase in traffic; however, because a portion of Watt Avenue affected by the project is also partially within Sacramento County, Sacramento County must agree to make, or allow the developers to make, the needed roadway improvements. Assuming Sacramento County permits the proposed improvements, the Placer Vineyards Specific Plan developers will construct, or will pay their fair share toward the construction of all needed roadway improvements.

As a part of the initial project “backbone infrastructure” (prior to any development) Watt Avenue and Baseline Road will be widened by the project proponents to four lanes and signalized. The project will also contribute its fair share to the improvement of PFE Road. Additional widening and roadway improvements will occur at agreed upon trigger points, based on the pace and extent of future development. Trigger points for roadway improvements and widening are discussed in Chapter IV of the project Financing Plan, which is available for review at the Placer County Community Development Resource Agency, 3091 County Center Drive, Suite 280, Auburn CA 95603. Also, see Mitigation Measures 4.7-2a, 4.7-5b, 4.7-13b, and 4.7-15b as they appear in the Partially Recirculated Revised Draft EIR, which is also available for review at the above location.



August 30, 2006
E225.000

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

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

**Subject: Notice of Availability for Public Review Partially
Recirculated Revised Draft EIR-Placer Vineyards Specific
Plan Project**

**Board of Directors
Representing:**

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

Dear Ms. Lawrence:

Both the County Sanitation District 1 (CSD-1) and the Sacramento Regional County Sanitation District (SRCSD) reviewed the subject documents and have the following comments:

SRCSD has previously responded to the subject Draft Environmental Impact Report (DEIR), and copies of our correspondence dated April 10, 2006 and April 25, 2006 are attached. As indicated in this correspondence, our District would neither have capacity nor the authority under our policies to serve this out-of- district area. Only with a change in policy and acceptance of stored effluent conveyed could we provide any service to this out-of-county area at any time. Your DEIR documents should be corrected to reflect this fact.

If you have any questions regarding these comments, please call Stephen Moore at (916) 876-6296 or myself at (916) 876-6094.

Sincerely,

Wendy Haggard
Wendy Haggard, P.E.
Department of Water Quality
Development Services

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

WH/JRO

Enclosures

- cc: Mary Snyder
Christoph Dobson
Wendell Kido
Melenie Davis
Amber Schalansky
Paul Philleo
Neal Allen
Steve Norris
Bob Hedges

Technology in balance with nature

A



April 25, 2006

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

Mr. Jim Durfee
Department of Facility Services
County of Placer
11476 C Avenue
Auburn, CA 95603

Subject: Placer Vineyards Specific Plan Area

Board of Directors
Representing:

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

Dear Mr. Durfee:

County Sanitation District 1 (CSD-1) and Sacramento Regional County Sanitation District (SRCSD) staff have completed review of the Placer Vineyards Specific Plan Revised Draft EIR and note that the preferred alternative for provision of sanitary sewer services to the area is to connect to the Dry Creek Wastewater Treatment Plant with the optional alternative to connect the westerly portion of the Placer Vineyards area to SRCSD.

We presume that this decision means that in all probability the Placer Vineyards wastewater flow will not be connected to the SRCSD system and capacity will not be provided in the future Rio Linda Interceptor that is presently in preliminary design.

Should you have any questions, please call me at (916)876-6002.

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

Sincerely,

Wendell H. Kido
District Manager

cc: Mary Snyder
Christoph Dobson
Neal Allen
Bob Hedges ✓



April 20, 2006

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

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

Dear Ms. Lawrence:

Board of Directors
Representing:

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

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

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

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

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

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

Sincerely,

Robert D. Hedges
Senior Civil Engineer

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

LETTER 4I WENDY HAGGARD, SACRAMENTO REGIONAL COUNTY SANITATION DISTRICT

Response 4IA: As explained in the Partially Recirculated Revised Draft EIR, pursuant to CEQA Guidelines Section 15088.5, subdivision (f)(2), Placer County, in preparing the Final EIR, is only required to respond to comments received during the recirculation period for the Partially Recirculated Revised Draft EIR that relate to the chapters or portions of the Revised Draft EIR that were revised and recirculated. The Partially Recirculated Revised Draft EIR specifically provided, “[t]he partial recirculation is not an opportunity to re-submit comments on previously published topics, or add additional comments on previously published topics” (Partially Recirculated Revised Draft EIR, pages 1-14 to 1-15). The Partially Recirculated Revised Draft EIR cautioned readers not to submit comments on issues not directly implicated by the Partially Recirculated Revised Draft EIR (Partially Recirculated Revised Draft EIR, page 1-15). Although CEQA does not require the County to respond to comments on the Partially Recirculated Revised Draft EIR that address topics not covered in the partially recirculated document, the County is nevertheless responding to such comments for purposes of informational disclosure.

The comment submitted by Sacramento Regional County Sanitation District (SRCSD) states that SRCSD “neither ha[s] the capacity nor the authority” to provide sanitary sewer services to the Placer Vineyards Specific Plan area. The comment also indicates, inaccurately from the County’s standpoint, that this unqualified message had already been communicated through prior correspondence. While noting that the comment letter is a staff level document that may not reflect considered board-level policy at SRCSD, the County acknowledges the fact that SRCSD’s current planning efforts do not include providing service to the Specific Plan area. Nevertheless, the County has chosen in this Final EIR to keep open the option of sending project area effluent to SRCSD’s system in order to finalize an analysis that has been included in both the original Draft EIR and the Revised Draft EIR. Towards this end, the project has been modified so that, if SRCSD provides sewer service, the project can store peak wet weather flows on-site in order to reduce flows during such conditions (see Letter 2 from Robert D. Hedges to Lori Lawrence, April 21, 2006, and responses thereto). This comprehensive environmental analysis may prove to be very valuable and necessary in the event that the project does not pursue what is now its preferred option of sending its effluent to the Dry Creek Wastewater Treatment Plant, and instead turns to SRCSD as a possible service provider.

As stated in the Revised Draft EIR, “[t]he Specific Plan proponents have identified a preferred plan for wastewater collection and treatment that would direct wastewater for the entire Specific Plan area to the Dry Creek Wastewater Treatment Plant (DCWWTP) for treatment and disposal, and an *optional* plan for the western 4,340 acres of the Specific Plan area that would use the SRCSD” (Revised Draft EIR, page 4.11-33, emphasis added). The SRCSD option was included because it was identified in the *West Roseville Public Facilities Plan*, incorporated by reference into the *Dry Creek/West Placer Community Plan*, as the most feasible option at the time those plans were prepared.



September 11, 2006

Lori Lawrence
Placer County Community
Development Resource Agency
Environmental Coordination Services
3091 County Center Dr.
Auburn, CA 95603

Re: Placer Vineyards Specific Plan Partially Recirculated Revised Draft EIR

Dear Ms. Lawrence,

We appreciate Placer County's efforts to improve the accuracy of the DEIR prior to issuance of the Final EIR. Of the two impacts that have received additional analysis in this document, the impacts and mitigations to biological resources are of special concern to our organizations.

A

Unfortunately the Revised DEIR, although it acknowledges that a few more special status species may be impacted by the project, is based in part on a biological survey that is fundamentally flawed. As we noted in our original comments, the period in which field surveys were conducted did not include the spring season, when a number of special status species appear. That has not been corrected in the Revised DEIR; therefore a list of impacted special status species must be assumed to be incomplete.

B

In many other ways the DEIR remains a flawed document. We are deeply concerned about inadequate mitigations for impacts to listed species and habitat, the failure to employ feasible mitigations for impacts to air quality, and the failure to demonstrate the ability to provide needed infrastructure, wastewater treatment and a long-term water supply.

C

Thank you for the opportunity to comment on the Placer Vineyards Specific Plan Partially Recirculated Revised Draft EIR.

Sincerely,

s/ Terry Davis
Conservation Program Coordinator
Mother Lode Chapter Sierra Club

s/ Ed Pandolfino
Conservation Co-Chair
Sierra Foothills Audubon Society

s/ Kim Delfino
California Program Director
Defenders of Wildlife

s/ James Pachl
Attorney Representing:
Sierra Club and Friends of Swainson's Hawk

**LETTER 42 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 42A: Commenters acknowledge the Partially Recirculated Revised Draft EIR and note that the two impacts discussed therein are of special concern to the represented organizations. Comment noted. No new concerns requiring a response are raised by the comment.

Response 42B: Commenters believe field surveys that were performed are flawed and this was not corrected in the Partially Recirculated Revised Draft EIR. Commenters are referred to Responses to Comments 24S and 25C.

Response 42C: Commenters believe that the Revised Draft EIR remains a flawed document and specifically mention purportedly inadequate mitigation measures for listed species and habitat, failure to employ feasible mitigation measures related to air quality, and a failure to demonstrate needed wastewater and water supply infrastructure. The comment does not appear to be a comment on the Partially Recirculated Revised Draft EIR and raises, in a vague and general manner, comments made previously on the Revised Draft EIR. The commenters are therefore referred to responses to previous comments, specifically Responses to Comments 24H, 24K, 24L, 24M, 24N, 24O, 24P, 24Q, 24S, 24T, 24U, 24V, 24X and 24Y.

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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



September 7, 2006

File No.: 220.10284.13332.SCH#1999062020

Ms. Lori Lawrence
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95603

Dear Ms. Lawrence:

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

The effect this project will have over the Auburn CHP Area could be significant in the sheer magnitude of residents it will attract. The proposed plan encompasses approximately 5,230 acres currently in the unincorporated area of Placer County. The plan calls for a maximum of 14,132 residential units. Placer Vineyards will have a population of approximately 33,000 people. Additionally, approximately 7,594 jobs will be created within the proposed project. Finally, this project is estimated to generate 243,567 vehicle trips per day.

The Auburn CHP Area office is responsible for more than 800 square miles of area in west Placer County, which includes I-80, S.R. 49, S.R. 193, S.R. 65, and over 1,100 miles of county roadways. We currently have 30 Road Patrol Officers assigned to the Auburn CHP Area office to patrol these roadways 24 hours a day, 365 days a year. We are committed to providing the maximum amount of service and traffic enforcement allowable with our current staffing levels. However, this project will significantly impact our ability to provide traffic law enforcement services, unless additional staffing is allocated to patrol this project.

There are no immediate plans to augment the workforce in the Auburn CHP Area Office nor are there any major roadway projects to significantly increase the traffic capacity of I-80 or SR-65. This is an area that should be discussed as this project, along with several other major developments within the immediate vicinity, will have a major impact on traffic.

A

Ms. Lori Lawrence
Page 2
September 7, 2006

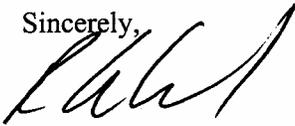
In order for the Auburn CHP Area to adequately patrol the Placer Vineyards, we will need an additional 36 officers, 3 Sergeants, 1 Lieutenant, and 2 office assistants to accommodate this project. The additional personnel are based on the Placer County Sheriff's Department's staffing formula for providing law enforcement services within Placer County. The PSCO formula is 1.3 personnel per 1,000 residents (1.3:1,000). PSCO is requesting 36 deputies plus support staff to provide law enforcement services within this project. PSCO is responsible for the same geographic area as the Auburn CHP Area. PSCO is responsible for handling the enforcement of criminal investigations and incidents while the Auburn CHP Area is responsible for handling enforcement of traffic investigations and incidents within Placer County. Using PSCO's staffing formula, the Auburn CHP Area will need 43 additional personnel to provide traffic enforcement, accident investigation, motor services, and vehicle theft incidents.

I-80, which bisects the City of Roseville, is currently operating at near maximum capacity. During certain times of the day, I-80 is beyond capacity resulting in gridlock or near gridlock as traffic flows at a seriously reduced speed in both directions. Furthermore, SR-65, which is located on the north edge of Roseville, has already experienced a major increase in usage due to the growth from the cities of Lincoln, Roseville and Rocklin. The opening of the Thunder Valley Casino in June 2003 has further impacted traffic along this major route. Any significant increase in growth will further adversely affect these major routes of travel.

A cont.

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

Sincerely,



RICK WARD, Captain
Commander
Auburn Area

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

LETTER 43 RICK WARD, DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

Response 43A: The commenter believes that the project will significantly affect CHP operations and responsibilities. See Response to Comment 5A for a discussion of effects on State highways.

The CHP does provide traffic-related services on County roads (e.g., speed control). Growth in the County and elsewhere will increase demand for CHP services, as well as other State-funded services. Typically, these services are provided through resources available to the State, such as income tax. Placer County does not fund CHP activities. As the population of Placer County and the State grows, taxes and other sources of revenue available to the State should also increase. The State would then decide how best to fund the various services and programs.

The commenter suggests that the same service levels used for the Sheriff's Department should be used to determine appropriate CHP staff levels. However, the commenter has not shown with any hard data any clear nexus between possible approval of the proposed project and the personnel positions identified in the letter or that, in any event, the number of positions requested is proportional to any nexus that might be demonstrated. In fact, the County population is over 300,000, so the current staff level for the CHP, assuming the 30 patrol officers in the Auburn office, is about 1:10,000, assuming all of these staff are assigned to roads serving only the County population. State highways and some county roads are used by individuals from throughout the region. The County is unaware of any precedent for a local government to fund CHP services or to force a single development project to fully fund, in perpetuity presumably, the jobs of individuals working for a state agency with statewide jurisdiction. Such costs could be perceived as a de facto tax on Placer Vineyards Specific Plan residents and businesses not borne by similarly situated residents and businesses elsewhere in the region and state. Nonetheless, the County shares the CHP concern that highways and roads be adequately patrolled, and will continue discussions with the CHP about this issue.



City of Rocklin

3970 Rocklin Road
Rocklin, CA 95677-2720
916-625-5000
TDD 916-632-4187
www.ci.rocklin.ca.us

September 13, 2006

Lori Lawrence, Planning Technician
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95603

RE: Placer Vineyards Specific Plan Partially Recirculated Revised Draft Environmental Impact Report

Dear Lori:

Thank you for the opportunity to review the above-referenced document. We have completed our review and although the document was revised to incorporate a revised traffic analysis, we did not see that our prior concerns/comments regarding traffic have been addressed. Accordingly, we re-state 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 impacts for City of Rocklin roadway segments and/or intersections. Also, feasible mitigation measures should be identified for any significant impacts.

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

A

B

Administrative Services 625-5000 FAX 625-5095 – City Hall 625-5560 FAX 625-5561
Community Development 625-5160 FAX 625-5195 – Engineering 625-5140 FAX 625-5195
Building 625-5120 FAX 625-5195 – Community Services and Facilities 625-5200 FAX 625-5296
Public Works 625-5500 FAX 625-5501 – Police 625-5400 FAX 625-5495 – Fire 625-5300 FAX 625-5303

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.

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

TAR/ts

P:\PUBLIC PLANNING FILES\DavidM\COMMENTS TO OTHER AGENCIES\Comments on Placer Vineyards
Partially Recirculated Revised DEIR.doc

B cont.

LETTER 44 TERRY RICHARDSON, CITY OF ROCKLIN

NOTE: This letter is identical to Letter 31.

Response 44A: 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. See Response to Comment 31A.

Response 44B: 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. See Response to Comment 31B.

William D. Kopper

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

Paralegals
Kristin Rauh
Sherry Augustine

September 13, 2006

VIA FACSIMILE (530) 745-3080
AND FIRST CLASS MAIL

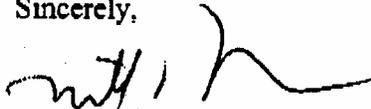
Planning Department
Placer County
3091 County Center Drive
Auburn, CA 95603

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

Dear Planning Staff:

Please find attached the comments on the Placer Vineyards Partially Recirculated Revised Draft Environmental Impact Report that are submitted on behalf of Rob Collins, Mark Steelman, and Michael Williams.

Sincerely,



WILLIAM D. KOPPER

WDK:kgr
enclosure



SMITH ENGINEERING & MANAGEMENT

September 12, 2006

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

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

P06003

Dear Mr. Kopper:

Per your request, I have reviewed the Partially Recirculated Revised Draft Environmental Impact Report (hereinafter the PRRDEIR) on the proposed Placer Vineyards Specific Plan (hereinafter "the project"). My review has concentrated on the transportation and circulation component of the PRRDEIR. I have previously commented on the Revised Draft Environmental Impact Report on this project in a letter dated May 11, 2006. This current letter-report summarizes my comments on the PRRDEIR for transmission to Placer County.

The numerous changes in significant impacts disclosed at specific roadway segments and intersections presented in the PRRDEIR do not change the pattern of massive transportation impacts that the project would cause. Mitigation of some of the project's impacts is infeasible; for some other impacts, feasibility of mitigation is disclosed as doubtful. Mitigation of many of the impacts depends on conclusion of interagency agreements with other governmental jurisdictions and, although in some cases the project will directly pay to implement mitigations, in a vast majority of cases, actual implementation of the mitigation is dependent on the emergence of other land use developments that will be fair share or fee contributors. In fact, the PRRDEIR discloses that other fee and fair share contributors will be expected to fund the vast majority of the cost of the necessary mitigations. Hence, mitigation of the project's transportation impacts is dependent

A

TRAFFIC • TRANSPORTATION • MANAGEMENT

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on the speculative presumption that sufficient other fee- and fair share- paying developments will actually be developed in a timely manner such that sufficient funds will be raised to implement the necessary mitigation measures.

A cont.

The purported finance plan for infrastructure improvements disclosed in the PRRDEIR is vague and unspecific; it provides no more solid detail than the finance plan that was absent in the RDEIR. The two page finance plan presented in Appendix W of the PRRDEIR is simply an unsubstantiated assertion that private development will pay for the infrastructure improvements needed, either by directly funding construction of backbone infrastructure or by contributing to existing or new development fee programs or new Community Facilities Districts. It is worthy of note that formation of a Community Facilities District under the Mello-Roos Act would tend to force development on property owners inside the District since the obligation to pay since the obligation to pay the annual tax levies that such a district would involve would tend to maintain the lands in agricultural use infeasible.

B

The cost estimates contained in the "fair share traffic impact fee study" (Appendix Z) create additional doubt rather than assurance. Although the PRRDEIR asserts that the information contained in Appendix Z will "demonstrate to reviewers that, although the dollar amounts at issue are very high, they are not so high as to render the County's approach infeasible from an economic standpoint," this overconfident assertion is rendered doubtful by several considerations, as follows.

C

- Because no details are provided for the preliminary cost estimate of mitigation measures that underlies the fair share traffic impact fee analysis, the public has no way of judging how reliable these cost estimates are. If the estimates are based on purely conceptual plans and generic aggregate unit costs per foot or per mile for the various roadway types, a high level of uncertainty must be associated with the costs. If the costs are estimated from purely conceptual plans but involve rough estimates of quantity take-offs and unit prices by quantity, with consideration of necessary structures and construction difficulty based on topographic and geotechnical mapping, somewhat less but still substantial uncertainty would be associated with the cost estimates. If the costs are based on quantity take-offs from actual preliminary engineering drawings for the improvements (materials not likely to be commonly available for most improvements at this stage of project development), the cost estimates might be regarded as more reliable. Unless information is provided that allows the public to know the basis of the cost estimates and such considerations as what contingency percentage is assumed and what construction cost inflation is assumed over what duration, the cost estimates that underlie the analysis must be regarded as an issue in doubt.

D

- As we have previously noted, the project's mitigation program is dependent on other expected development materializing as fair share fee payers contributing to the pool of funds that will allow the presumed mitigations to be fully funded and implemented in a timely fashion. As we have observed, whether all of the other development assumed will actually take place in a timely fashion to implement the mitigations is a matter of speculation. Hence, the proposed mitigations themselves remain speculative. The "fair share traffic impact fee study" presented in Appendix Z provides some dimension to this concern. It shows Placer Vineyards contributing only some \$39.7 million toward a traffic mitigation program whose total costs (according to the still unsubstantiated Appendix Z estimates) would be some \$309.6 million. That is to say, other development is being counted on to provide more than 87 percent of the funding needed for mitigation projects. If 15 to 20 percent of other anticipated development scattered throughout the analysis area failed to take place in the anticipated time frame (an occurrence relative to both deferred development timing and scattered location that is often characteristic), the net traffic mitigation needs for the area would likely remain about the same but there would be a \$46 million to \$62 million shortfall in fair share fee contributions to implement the needed mitigations.
- The Appendix Z analysis unreasonably assumes that other fair share payers will emerge to pay half the fair share of project trips made to "external" (outside the Placer Vineyards project) origins or destinations. While this assumption may prove reasonable where the "external" end of the trip is at another new development within the general area where the proposed mitigation measures are to be implemented (presuming hypothesized intergovernmental agreements are implemented), fair share contributions are unlikely to happen where the "external" end of the trip is at an existing development location (whether that existing development is near or distant) or when the "external" trip end is at a new development located outside the area where mitigation improvements are being made by the project. The shortfall in mitigation funds resultant from this loophole in the fair share contribution methodology cannot be estimated from the information provided in the PRRDEIR since it does not identify how many of the project external trips will be made to existing development or to destinations outside the area of mitigation. However, it is reasonable to conclude that the shortfall could significantly impair implementation of the assumed mitigation program.

E

F

Conclusion

Based on the foregoing, it is my opinion that the PRRDEIR previously expressed concerns about the uncertain nature of the proposed mitigation program. Due to

G

Mr. William D. Kopper
September 12, 2006
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this substantial uncertainty, the proposed mitigation program does not qualify as mitigation under CEQA.

G cont.

Sincerely,

Smith Engineering & Management
A California Corporation

A handwritten signature in black ink, appearing to read "Dan Smith Jr.", written in a cursive style.

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

LETTER 45 WILLIAM D. KOPPER, ATTORNEY AT LAW

Response 45A: The commenter is critical of the County’s approach to mitigating the traffic-related impacts of the project. In response, the County notes that its approach of assessing the project only for its “fair share” of the costs of various improvements is consistent with constitutional limitations (see CEQA Guidelines, Section 15126.4, subd. (a)(4), and court cases cited therein), and further notes that, with respect to impacts occurring outside the County’s unincorporated area, the County proposes to commit to the steps necessary to create the institutional and legal arrangements needed to create a flow of money from the project proponents to the County and thence to other entities such as Caltrans, the City of Roseville, and the Counties of Sacramento and Sutter (see also Response to Comment 35D). The County has disclosed the impacts of its proposed approach in an honest, straightforward, and legally conservative manner. Not all impacts can be mitigated to less than significant levels. In particular, those impacts that can only be mitigated through fair-share contributions to proposed facilities that would be built outside the unincorporated area (see Revised Draft EIR, Mitigation Measure 4.7-2a), and that therefore require the cooperation and participation of one of more agencies other than Placer County, have been identified as potentially significant impacts, since the cooperation of those agencies cannot be guaranteed at this time.

The commenter also suggests that the fair-share mitigation program is flawed because implementation, or construction, of many of the mitigation measures depends on the buildout of other “speculative” land use developments. This criticism could be made of almost any local agency’s capital improvement program, as such programs are premised on the notion that planned or other foreseeable development will in fact, over time, come to pass. Notably, both the CEQA Guidelines (Section 15130, subd. (a)(3)) and CEQA case law are clear that fee-based infrastructure mitigation programs based on fair-share contributions, such as Mitigation Measure 4.7-2a, are adequate mitigation measures under CEQA (see, e.g., *Save Our Peninsula v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99). Here, out of an abundance of caution, the County has concluded that, at the present at least, many of the impacts in question should be considered significant and unavoidable, even though a much more optimistic conclusion is possible.

Further, in determining the levels and types of development that are anticipated to provide future “matching” funding, the County was also conservative. First, the County appropriately assumed that any development anticipated in the County’s General Plan was reasonably foreseeable in the sense that the General Plan itself embodies a policy commitment, made in 1994, that certain levels of development should, and presumably will, occur in certain places. Such development cannot fairly be characterized as “speculative”; in fact, the County’s entire planning program is premised on the notion that, at some point in the future, the General Plan will “build out.” Virtually every city and every county in California operates under the same assumption, or should. In anticipating, in some instances, development levels beyond the County’s boundaries, and in considering projects proposing General Plan amendments that have not yet been considered or approved, the County employed expert market and demographic projections that, based on past and present trends, predicted future conditions. This approach, too, informs sound land use and transportation planning and is a common means of supporting fee-based mitigation programs. Although the precise identity of future development projects that would contribute

their respective fair shares as part of the regional traffic mitigation program are not currently known with specificity, such development is nevertheless sufficiently foreseeable for purposes of tentatively projecting future fee revenues. Notably, any fee-based programs adopted pursuant to Mitigation Measure 4.7-2a can be adjusted over time as future conditions take shape. Although it might be possible that the County is currently anticipating more development than might actually occur over the next 20 years, it is equally possible that the County may be underestimating the amount of future development that could occur. Under either hypothetical scenario, the County and its partners can adjust their programs as they go. The commenter seems to ask for perfect prophesy. No local government is so blessed. Nor would it be prudent to size infrastructure such as future roads without regard for future development trends simply because there are not pending “project” applications for each and every parcel anticipated for development based either on general plan maps or expert market or demographic projections. See also Response to Comment 15D.

Response 45B: The commenter is critical of the Financing Plan and claims that it lacks detail. Commenter also claims that a Community Facilities District (CFD) forces development on property owners that otherwise would not develop their land.

The commenter refers to a “two page finance plan” presented in Appendix W of the Partially Recirculated Revised Draft EIR. The document that the commenter refers to is not the Financing Plan; rather it is a summary presented for the convenience of those that do not wish to read the full Financing Plan. The title of the document both in the Partially Recirculated Revised Draft EIR Table of Contents and on its face is “Financing Plan Summary.” As is stated on page 1-13 of the Partially Recirculated Revised Draft EIR: “The Draft Financing Plans are not appendices to the Partially Recirculated Revised Draft EIR, but the Partially Recirculated Revised Draft EIR and Draft Financing Plan are available for public review at the following address...” Each Financing Plan (project and Blueprint) is approximately 130 pages in length plus appendices. Had the commenter examined the Financing Plan, to which he had easy access, he would have found considerable detail to substantiate the generalized information provided in the Financing Plan Summary presented in Appendix W.

With regard to the observation that CFDs force land conversions, the commenter is reminded that the Specific Plan is property owner sponsored by owners who wish to develop. The SPA would not be included in the CFD and any other property owner that wished not to participate is not obligated to be included. A CFD need not include every property, should a CFD ultimately be the method chosen to finance some or all of the improvements at issue. It is also important to note that a CFD is a financing mechanism and by itself creates no impact. All impacts of the Placer Vineyards Specific Plan have already been addressed in the multi-volume EIR for the Specific Plan, including the conversion of agricultural land (see Impact 4.1-3 on page 4.1-540 of the Revised Draft EIR). Finally, the Placer Vineyards project site has been shown for urban development in the Placer County General Plan since 1994. This is not unplanned or unanticipated development to which the concerns expressed by the commenter might more appropriately apply.

Response 45C: The commenter questions the validity of the fair share traffic impact fee study contained in Appendix Z of the Partially Recirculated Revised Draft EIR and provides three

areas of discussion, which are set out below in Responses to Comments 45D, 45E and 45F. As background to the following responses, it is important to understand that the cost estimates are “order of magnitude” estimates and are not based on final design of facilities. It would be unreasonable to expect (and unprecedented) to proceed beyond order of magnitude estimation prior to completion of the project CEQA and entitlement processes. Further, as is fully disclosed on pages 1-12 and 1-13 of the Partially Recirculated Revised Draft EIR:

The fair share results are presented for informational purposes only and are not meant to be the final traffic impact fees of the proposed development. Placer County will work with each jurisdiction/agency in which mitigation measures are identified to determine the appropriate fair share contribution. The County’s intent is to supply other agencies and the general public with as much information as possible, short of engaging in mere speculation, regarding the details of the project’s proposed funding mechanism for off-site transportation improvements. Thus, provision of this additional information should not be considered evidence of the County’s concurrence with commenters on the Revised Draft EIR who suggested that CEQA requires inclusion of such information. The County’s view is that, because the proposed mitigation measure is to create new funding programs to deal with impacts occurring outside unincorporated Placer County, nothing in CEQA requires that the EIR for the Placer Vineyards Specific Plan contain detailed information regarding specific dollar amounts required for various improvements or what fees might be per dwelling unit or square foot of non-residential development within the Specific Plan area. Even so, the County has prepared what it considers the best available estimates as to what those dollar amounts might turn out to be.

Response 45D: The commenter wants the basis of the cost estimates disclosed, e.g., generic aggregate unit costs, conceptual plans, or preliminary engineering drawings.

As stated in the Response to Comment 45C, the preliminary cost estimates for the cumulative mitigation measures were prepared to establish an “order of magnitude” value for the cost of said mitigation measures. The estimated costs are not based on preliminary engineering plans, which as the commenter notes are “materials not likely to be commonly available for most improvements at this stage of project development.” As such preliminary plans are not commonly available, they are not typically required to prepare “order of magnitude” costs. The methodology used to prepare the preliminary cost estimates is described below.

The preliminary cost for each cumulative mitigation measure was estimated as the sum of three components: a preliminary construction cost, a construction contingency equal to 30% of the construction cost, and a “soft” cost for engineering studies, engineering design, plan preparation, agency plan checking fees and permits, and construction staking, equal to 20% of the construction cost.

The construction cost component for each mitigation measure was calculated using one of three methods depending on the nature of the mitigation measure. Each mitigation measure was characterized as an intersection widening, a new/widened road, or a widened highway.

Preliminary conceptual plans, based on mitigation measure descriptions, were developed for proposed intersection widenings. Construction costs for the intersection improvements were then calculated by applying unit prices to estimated materials needed for construction using the conceptual intersection plans. Construction costs for mitigation measures identified as new/widened roads were calculated by applying estimated price per lineal foot costs over the length of the proposed road improvement. Preliminary road sections for the new / widened roads were prepared and quantity take-offs were estimated on a per foot basis for each road section. Unit prices were then applied to the quantity take-offs to determine a price per lineal foot for the proposed road improvement. Construction costs for highway widening mitigation measures were calculated by applying a price per lane mile, obtained from the Placer County Transportation Planning Agency (PCTPA), over the length of the proposed highway improvement.

The location of each mitigation measure was reviewed either in the field or on an aerial photograph to determine whether any existing visible condition might contribute to an increase in the construction cost of the mitigation measure. Unit prices were increased if such a condition was noted and then applied to the respective quantity take-off.

Aerial photographs were also used to determine when additional road right-of-way might be required to implement a proposed mitigation measure. When a proposed mitigation measure appeared to require additional right-of-way, a preliminary drawing was prepared with the proposed improvements drawn on the aerial photograph and cost estimates were prepared as shown in Attachment A of Appendix Z in the Partially Recirculated Revised Draft EIR.

To the extent that the Commenter may be contending that even this sort of detailed analysis is insufficient under CEQA because the applicants and the County do not yet possess final engineering and design information for each proposed improvement, the County responds that such information is not necessary for either an “order of magnitude” cost analysis or for CEQA compliance purposes. Notably, the above-described estimates reflect the best professional judgment of engineers and other professionals with considerable experience not just in preparing traffic studies but also in designing transportation facilities and overseeing their construction.

In summary, information more detailed than that described above simply does not exist at present, and is not required by CEQA. Rather, EIRs typically include only that amount of design and engineering information needed to ascertain the environmental consequences of projects and project infrastructure, and do not include more complete or detailed design or engineering level information. The latter kinds of very detailed information, which are not necessary for impact analysis, represent very expensive and time-consuming work that normally is not done until after public agency approval bodies, based on completed CEQA documents, grant their approvals and give projects green lights to proceed. In some instances, the formulation of such very detailed engineering and design information is extremely time-consuming expensive, and requires the cooperation and input of third party agencies that often refuse to offer such help in the absence of completed CEQA documentation and project approvals.

Also See Response to Comment 45C.

Response 45E: The commenter believes that underlying assumptions concerning how the project's "fair share is figured are speculative and could result in an eventual funding shortfall. As is described in the Partially Recirculated Revised Draft EIR and in Response to Comments 38F, 38H, 45A and 45C, the fair share results are presented for informational purposes only and are not meant to be the final traffic impact fees of the proposed development. No one can forecast precisely how and when future development will occur. The scenario used in the EIR and in the fair share calculations is a reasonable and probable outcome and is consistent with SACOG regional growth expectations. The estimates will be refined and adjusted over time to more closely reflect future events, but at this point they represent a reasoned and good faith effort to identify future costs and the project's probable share of that cost.

Response 45F: The commenter believes that the fair share methodology results in a shortfall where the external end of a trip is at an existing development or at a destination outside the study area. The Appendix Z analysis is presented for informational purposes only and its results are not meant to be final traffic impact fees of the proposed development. The methodology used in Appendix Z considered only new trips attributed to land use growth in the region, and it did not assign any cost responsibility to existing development. Finally, it should be noted that the project's fair share estimates shown in Appendix Z assume that all funding will be derived from new development, when in all likelihood, improvements on some of the facilities such as I-80 will come from other funding sources such as the State Transportation Improvement Program and statewide bonds. See Responses to Comments 38F, 38H, 45A, 45C and 45E.

Response 45G: The commenter believes the proposed mitigation program does not qualify as mitigation under CEQA. Commenter's opinion is noted. The County has determined that the Specific Plan's proposed traffic mitigation program fully satisfies the requirements of CEQA. See Responses to Comments 15D, 35D, and 45A.



Community Development
311 Vernon Street
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September 14, 2006

Lori Lawrence, Community Development Technician
Placer County Community Department Resource Agency
Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95603

Via: Fax and Regular Mail

Fax No. 530/745-3003

Page 1 of 4

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

Dear Ms. Lawrence:

Thank you for the opportunity to review and comment on the Partially Recirculated Revised Draft Environmental Impact Report (DEIR) for the PVSP dated July, 2006. Specific comments on the DEIR from individual departments are listed below followed by a discussion of the financing plan. The main concerns are related to impacts on City traffic circulation and transportation.

Public Works

1. One of the City's comments on the previous draft of the EIR requested that the PVSP contribute \$13 million for the cost of the City's ITS/TDM program, which represents the full cost for the current program. The intent of this request was to help minimize the impacts that the PVSP would have on the City's traffic operations. However, based on recent discussions between Roseville and Placer County Public Works staff, it appears that the County is considering an option where the PVSP contributes their fair share costs for all of the City's CIP improvements. While Mitigation Measure 4.7-2a (#6) seems to have the intent of the PVSP paying fair share costs for all the City of Roseville CIP, we feel that the introduction language to the various listed measures should be strengthened to require #6 and not allow for the option of "...any, or some combination, of the following forms."

Should the County and City be able to enter into an enforceable agreement in which the PVSP pays its fair share towards the City's overall CIP, the applicable contribution to the ITS/TDM program would be included in the fair share fee, and our the previous lump-sum request would no longer be applicable.

2. Figure 4.7-19 shows the proposed roadway network and number of lanes for each roadway. Due to the nature and volume of traffic using Baseline Road, it is important that the project provide parallel roadway facilities with sufficient capacity to attract trips

A

B

Ms. Lori Lawrence, Community Development Technician
 Partially Recirculated Revised Draft EIR for Placer Vineyards

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within the project away from Baseline Road. The City has previously expressed this concern, and in subsequent discussions, agreed that it would not be desirable to have a four-lane facility such as East Town Center Drive, running through an age restricted development. It is our understanding that the development in the area between Dyer Lane and Walerga Road has changed and is no longer proposed as an age restricted development. Based on that, we recommend that East Town Center Drive between Dyer Lane and Walerga Road be increased to a four-lane road to provide the required relief to Baseline Road.

B cont.

Financing Plan

3. Generally, the "Core Backbone" roadway improvements appear to be logical as far as up-front roadway infrastructure. The plan indicates that the "Remaining Backbone" infrastructure triggers are detailed in the Development Agreements, which the City has not been privy to the details and negotiations. However, we would like to ensure that a high priority has been given to the timing/triggers for the further widening of Baseline Road and Watt Avenue through the Plan Area. These are significant east/west & north/south roadways that have been shown to be critical to serve the expanding growth of the region.

C

4. Page V-6, Under "SOURCES OF FUNDING" states that "Developers that construct these improvements would be eligible for reimbursement through either a debt-financing mechanism or fee program for improvement costs identified in a fee program." This should clarify that the applicable reimbursements from regional fee programs would be subject to approval of the Board for those regional fee programs. The following paragraph further states that "Private capital used for these purposes may be subject to fee credits or reimbursements from future fee collections.... pursuant to County fee credit and reimbursement policies." The document should state that all fee credits and reimbursements shall be subject to approval of the Board of those fee programs.

D

5. Page V-8, Under Placer-Roseville Joint Fee Program, describes Baseline Road improvements from the Sutter County line east to Foothills Road. This should read Foothills Boulevard.

E

6. Page V-8, Under Placer-Roseville Joint Fee Program, describes Fiddyment Road improvements as four lanes from Baseline Road north to the northern boundary of the West Roseville Specific Plan. This should read six lanes from Baseline Road north to Pleasant Grove Boulevard and four lanes from Pleasant Grove Boulevard to the northern boundary of the West Roseville Specific Plan.

F

7. Section I and V of the Financing Plan identifies several existing fee programs, including the Roseville-Placer Joint Traffic Fee Program and the South Placer Regional Transportation Authority (SPRTA) Fee Program. A description of the Highway 65 Joint Powers Authority should also be included in the applicable sections, and it should be very clear that development within the PVSP shall be subject to all these existing fee programs.

G

Transportation

1. It appears that in the DEIR description of the Blueprint Alternative, the primary difference between the Blueprint Alternative and the Proposed Project is land use intensities (i.e. increased residential density). Land use density is but one of 7 goals stated by SACOG for Blueprint development. Another primary element is transportation

H

Ms. Lori Lawrance, Community Development Technician
 Partially Recirculated Revised Draft EIR for Placer Vineyards

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<p>choices. The DEIR does not appear to present any alternative choices for transportation. As a result, the impacts of increased density associated with the Blueprint Alternative are potentially overstated.</p>	<p>H cont.</p>
<p>2. Please clarify on DEIR Pg 4.7-20 whether the proposed ADA Dial a Ride (DAR) service will be the minimum required by law or plan-wide. Both Placer County and the City of Roseville currently provide General Public DAR services, so it seems reasonable that this plan would also provide these services. If not, the DEIR should evaluate whether such a change in policy would cause a change in DAR policy for transit services county-wide.</p>	<p>I</p>
<p>3. The DEIR describes the benefits of grade-separated crossings for Class I bikeways, but it does not identify where they will be provide nor does it require them as mitigation for the project. Grade-separated crossings should be provided where the Dry Creek Bike Trail meets arterial roads. Given the traffic speed/volume along Baseline Road, two grade-separated crossings of Baseline are warranted to connect future residents of the Sierra View and Regional University Specific Plans to the regional trail.</p>	<p>J</p>
<p><u>Financing Plan</u></p>	
<p>4. The Financing Plan appears to underestimate the area needed for maintenance of a robust transit fleet. The maintenance plan should be revised to identify costs for: Indoor maintenance, covered parking, a wash bay, multiple covered islands for gasoline, diesel and CNG, a slow fill CNG fueling facility, and extension of large diameter natural gas lines. Also, please confirm if the assumptions include any consideration of a BRT fleet, and if so to what extent.</p>	<p>K</p>
<p>5. The Financing Plan does not provide a description of the transit center. Please provide a description of the transit center improvements and update the financing plan accordingly.</p>	<p>L</p>
<p>6. Please confirm that the finance plan includes all capital equipment for the operation of a transit fleet expected from this project and that of other projects in the area (a cumulative scenario).</p>	<p>M</p>
<p>7. Table III-15 - The construction cost estimate for the Dry Creek Corridor open space trail is low. In our experience, environmental constraints and other factors will result in a cost substantially greater than \$350,000 per mile.</p>	<p>N</p>
<p>8. Page III-45 – Please describe what mechanism the applicants of the PVSP will participate in to develop and operate a regional transit and bus rapid transit for South Placer County. In addition, Chapter IV should describe the timing of implementation of the transit system.</p>	<p>O</p>
<p>9. Chapter IV – Transit: Please confirm that subdivisions/parcels adjacent to planned transit routes will be required to install bus turnouts and shelters.</p>	<p>P</p>
<p>10. Chapter IV – Transit: This section should include provisions for the construction, capital costs and operations/maintenance costs of bus rapid transit.</p>	<p>Q</p>
<p>11. Page VI-2: PVSP Fee Program: The last sentence of this section states “Actual costs may be higher or lower than shown in this Financing Plan.” As noted above, for the Dry</p>	<p>R</p>

Ms. Lori Lawrence, Community Development Technician
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Creek Corridor trail the actual cost is likely to be higher. Please describe how potential increased costs will be addressed.

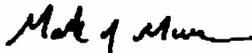
R cont.

- 12. Appendix I – The table in Appendix I states for Transit “See separate document provided.” However, the plan did not include the referenced document. Please provide this document.

S

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
- Mike Wixon

LETTER 46 MARK MORSE, CITY OF ROSEVILLE

Response 46A: The commenter states that although Mitigation Measure 4.7-2a, paragraph 6, regarding funding of improvements in the City of Roseville, appears to require fair share payments, the introductory language to the mitigation measure seems to allow options. Comment noted. The mitigation measure applies to other jurisdictions besides the City of Roseville and, therefore, the need for flexibility. The County intends to discuss the appropriate approach (i.e., paying for the entire ITS or assessing a fair share fee for all City improvements needed as a result of County development with the City of Roseville and the developers). The actual amounts and approach will be determined through the Development Agreement rather than the Financing Plan.

Response 46B: The City stresses the need for parallel facilities to Baseline Road and recommends that East Town Center Drive between Dyer Lane and Walerga Road be increased to a four-lane road, if the area east of Baseline is no longer age restricted. Although the County understands that the area east of Dyer Lane has changed hands, the development plan has not changed. The area will remain age restricted; therefore, East Town Center Drive should remain a two-lane facility.

Response 46C: The commenter provides comments on the infrastructure timing triggers contained in the Financing Plan and how such triggers may be reflected in the Development Agreement. The comments are noted. The County will continue to refine the Financing Plan in concert with the applicants and will keep the City of Roseville apprised of these efforts. A final Financing Plan will be available for review by the City prior to Board of Supervisors action on the project.

Response 46D: The commenter provides comments on the sources of funding discussed in the Financing Plan and requests clarification in the Financing Plan that actions regarding fees will be approved by the applicable Board. The comments are noted; however, the commenter does not link the comments to an environmental concern that is addressable in the EIR. The Board referenced on page V-6 is the County Board of Supervisors. The final Financing Plan will be clarified by referencing the appropriate Board or agency that will have responsibility to approve fees and reimbursements. The County will continue to refine the Financing Plan in concert with the applicants and will keep the City of Roseville apprised of these efforts. A final Financing Plan will be available for review by the City prior to Board of Supervisors action on the project.

Response 46E: The commenter notes a mislabeled roadway in the Financing Plan. Comment noted. The Financing Plan preparers have been advised of the correction.

Response 46F: The commenter provides a correction to the Financing Plan as it relates to roadways in the City of Roseville. Comment noted. The Financing Plan preparers have been advised of the correction.

Response 46G: The commenter requests that the Financing Plan include a description of the Highway 65 Joint Powers Authority. Comment noted. The County does not believe that the Placer Vineyards Specific Plan is subject to the Highway 65 Joint Powers Authority. The

County will continue to refine the Financing Plan in concert with the applicants and will keep the City of Roseville apprised of these efforts. A final Financing Plan will be available for review by the City prior to Board of Supervisors action on the project.

Response 46H: The commenter states that the EIR does not present alternative transportation choices under the Blueprint Alternative, and that this could overstate Blueprint Alternative traffic impacts. The EIR traffic analysis assumes a full range of transportation modes (e.g., vehicle, transit, bicycle, walking) for the proposed Specific Plan and the Blueprint Alternative. The same mode split is assumed as well. The percentage of trips that would be transit or other alternative modes of transportation was assumed to be the same for both, because the sources of funding known to be available at this time are the same. The absolute number of transit trips would be higher under the Blueprint Alternative, because of the additional residential units.

The level of transit use is dependent in large part on the availability of funding for transit operations. To be conservative, the EIR does not assume new sources of funding for transit (see page 4.7-54 of the Revised Draft EIR). There are aspects of the Blueprint Alternative that could facilitate increased transit use, such as higher density residential development, if funding is available. In that case, the traffic impacts would be less severe than reported in the Revised Draft EIR. This is true to a lesser extent for the proposed Specific Plan as well.

Response 46I: The commenter requests clarification of the level of Dial a Ride (DAR) to be provided. The project proposal is to provide ADA Para-transit as required by law. While different levels of DAR were evaluated in a study by LSC Transportation Consultants, the County is proposing that a higher, urban, level of transit service be provided within the development than is currently provided throughout the remainder of the County, allowing for ADA Para-transit to be utilized. The County has no formal policy as to what level of transit or DAR service is to be provided within Placer County and utilizes the General Public DAR service throughout the remainder of the County to complement and supplement fixed route transit service. The County has no plans to change current service levels of DAR.

Response 46J: The commenter requests grade separated crossings for bikeways. See Response to Comment 29N. A single grade separated crossing of Baseline Road is currently planned. Other at-grade crossings will be provided for bicyclists on both Baseline and Watt Avenue.

Response 46K: The commenter provides comments on the Financing Plan related to the maintenance of transit equipment and facilities. The comments are noted; however, the commenter does not link the comments to an environmental concern that is addressable in the EIR. The County will continue to refine the Financing Plan in concert with the applicants and will keep the City of Roseville apprised of these efforts. A final Financing Plan will be available for review by the City prior to Board of Supervisors action on the project.

Response 46L: The commenter requests that the Financing Plan contain a description of the transit center. Comment noted. A description of the transit center is more germane to a discussion of the Specific Plan rather than the Financing Plan. The commenter is referred to Specific Plan Policy 5.18.

Response 46M: The commenter requests that the County confirm that all equipment for operation of the transit fleet is included in the Financing Plan. Comment noted. The County will confirm and advise the City prior to consideration of the Final Financing Plan.

Response 46N: The commenter questions the cost estimate used for the Dry Creek open space corridor trail used in the Financing Plan. Comment noted. The County has reviewed the estimate appearing in the Financing Plan and believes the estimate is accurate. The County will continue to refine the Financing Plan in concert with the applicants and will keep the City of Roseville apprised of these efforts. A final Financing Plan will be available for review by the City prior to Board of Supervisors action on the project.

Response 46O: The commenter asks for a description in the Financing Plan of how the applicants will participate in regional transit, and bus rapid transit, and the timing of transit implementation. The comments are noted; however, the commenter does not link the comments to an environmental concern that is addressable in the EIR. The County will continue to refine the Financing Plan in concert with the applicants and will keep the City of Roseville apprised of these efforts. A final Financing Plan will be available for review by the City prior to Board of Supervisors action on the project. Also see Response to Comments 15TT and 29HHH.

Response 46P: The commenter requests that the Financing Plan confirm that bus turnouts and shelters will be required in conjunction with future subdivisions. Comment noted. Bus turnouts and shelters are more germane to a discussion of the Specific Plan rather than the Financing Plan. Specific Plan Policy 5.19 requires future development to provide for bus stops, turnouts and shelters.

Response 46Q: The commenter requests that information on the construction, capital costs, and operation and maintenance costs of bus rapid transit be included in the Financing Plan. Comment noted. See Response to Comment 29HHH.

Response 46R: The commenter asks how potential increased costs not anticipated by the Financing Plan will be addressed. As noted in the Financing Plan, costs are preliminary and are “order of magnitude” in nature. In the future the County’s fee program will be amended to reflect the costs associated with the Placer Vineyards Specific Plan. Those fees will then be reviewed and updated annually to reflect changed circumstances, including increases in the cost of labor, materials and land.

Response 46S: The commenter asks to see a copy of the “separate document” for transit referenced in Appendix I of the Financing Plan. Comment noted. The County will provide a copy of the transit document to the City at the earliest opportunity.



PLACER COUNTY
TRANSPORTATION
PLANNING AGENCY

RECEIVED

Letter 47

SEP 19 2006

ENVIRONMENTAL COORDINATION SERVICES

September 14, 2006

via email – ljlawren@placer.ca.gov and U.S. Postal Service

BOB SNYDER
City of Auburn
SHERRIE BLACKMUN
City of Colfax
TOM COSGROVE
City of Lincoln
MIGUEL UCOVICH
Town of Loomis
KATHY LUND
City of Rocklin
GINA CARBOLINO
City of Roseville
TED GAINES
JIM HOLMES
Placer County
RON MCINTYRE
Citizen Representative
CELIA MCADAM
Executive Director

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

**Re: Placer Vineyards Specific Plan – Partially Recirculated Revised Draft
EIR (SCH# 1999062020) – PEIR-T200540651**

Dear Ms. Lawrence,

Thank you for the opportunity to comment on the partially recirculated revised Draft Environmental Impact Report (PRRDEIR). PCTPA submitted comments on the Revised Draft DEIR on May 18, 2006 and the on the DEIR on January 3, 2005.

The PRRDEIR makes a number of text and map references to the proposed Placer Parkway. PCTPA, on behalf of the South Placer Regional Transportation Authority (SPRTA), is working to complete the Placer Parkway Corridor Preservation and Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR).

The Revised DEIR concludes that, as part of the Mitigated Transportation Network, the future Placer Parkway would:

- Provide substantial east-west traffic capacity.
- Help mitigate traffic impacts of not only the proposed Placer Vineyards project but the traffic impacts from other proposed developments in western Placer County.

Comments:

The following comments are on issues contained in the PRRDEIR. See the attached vicinity map, previous environmental review comments and our web site (www.pctpa.org) for background.

1. Page 4.7-21 refers to the Placer Parkway Corridor Preservation project/Tier 1 EIS/EIR and the range of alternative alignments. The PRRDEIR should

A

replace references to alternative alignments with 'corridor alignment alternatives'.

A cont.

2. Appendix W – Draft Financing Plan. This should acknowledge our May 18 comment related to helping secure mitigation for the future Placer Parkway via the developer agreement. This would facilitate future Placer Parkway permitting and the Mitigated Transportation Network.

B

3. Appendix Z – The Fair-Share Traffic Impact Fee Study. The Placer Parkway is listed in Tables 1 and 3 as part of Placer County's Mitigated Transportation Network. It is classified as N/A, to be included in Placer County's Tier 2 traffic mitigation fee, and not considered by this study.

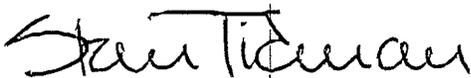
The PRRDEIR should note that the future Placer Parkway's actual implementation (acquisition, design, construction, and operation/maintenance) has not been determined. These future implementation issues may be shared by Placer and Sutter Counties, by a Joint Powers Authority, or other entity.

C

The Tier 2 traffic mitigation fee program has not been adopted. The proposed program is being developed via the South Placer Regional Transportation Authority (SPRTA) and its member jurisdictions (Placer County and the cities of Lincoln, Rocklin and Roseville). The proposed project as well as other proposed developments in the vicinity should fully participate in this future Tier 2 program and other regional transportation impact fee programs.

Thank you for the opportunity to comment on the PRRDEIR. If you have any questions, please call Celia McAdam, PCTPA Executive Director (823.4030 – cmcadam@pctpa.org) or me (823.4033 – stidman@pctpa.org).

Sincerely,

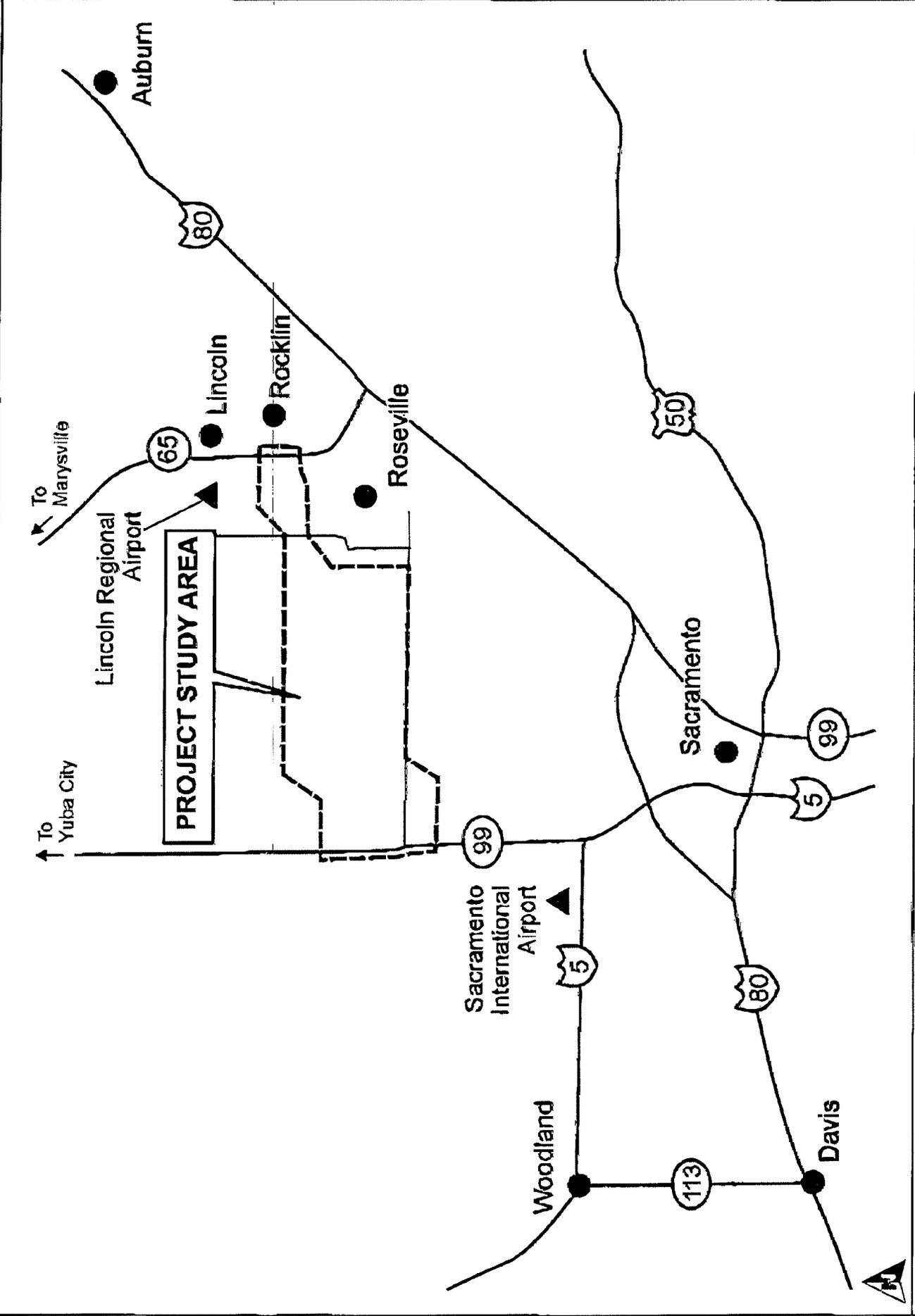


Stan Tidman, Senior Planner

ST:ss

Enclosures

Copies: Celia McAdam, PCTPA Executive Director
Rick Dondro, Placer County Department of Public Works
Denise Heick, URS Corporation



Project Location Map

July 2008

LETTER 47 STAN TIDMAN, PLACER COUNTY TRANSPORTATION PLANNING AGENCY

Response 47A: The commenter recommends that the reference on page 4.7-21 of the Partially Recirculated Revised Draft EIR to “range of alternative alignments” be changed to “range of corridor alignment alternatives.” Comment noted. The last paragraph on page 4.7-21 of the Partially Recirculated Revised Draft EIR is hereby amended as follows:

A Project Study Report (PSR) for Placer Parkway was adopted by SACOG and the Placer County Transportation Planning Agency (PCTPA) in 2001. An ongoing environmental review process (Tier 1 EIS/EIR) will evaluate a range of corridor alignment alternatives ~~alternative alignments~~ and will select a corridor so that right-of-way can be preserved. In the 8- to 10-mile area between Fiddymont Road and Pleasant Grove Road, the adopted Conceptual Plan for the Placer Parkway calls for no access to this facility except for a possible interchange at an extension of Watt Avenue. The Cumulative Plus Project with Mitigated Transportation Network scenario assumes that (1) Placer Parkway would be implemented along one of the five alignments under consideration in the ongoing PCTPA Tier 1 EIS/EIR process as shown on Figure 4.7-19 and (2) there is an interchange on Placer Parkway near the intersection of the Watt Avenue Extension and Blue Oaks Boulevard.

Response 47B: The commenter requests that the Draft Financing Plan acknowledge the need for Placer Parkway mitigation funding in the project Development Agreement. Comment noted. The County will continue to refine the Financing Plan in concert with the applicants. A final Financing Plan will be available for review by the PCTPA prior to Board of Supervisors action on the project. See Response to Comment 21B.

Response 47C: The commenter requests that the project fully participate in the future Tier II mitigation fee program for Placer Parkway as well as other regional transportation impact fee programs. Comment noted. See Response to Comment 21B.

Letter 48


County of Sacramento

MUNICIPAL SERVICES AGENCY – CHERYL CRESON, ADMINISTRATOR

Department of Transportation
Including service to the Cities of Citrus Heights and Rancho Cordova

Thomas J. Zlotkowski, Director

RECEIVED

SEP 25 2006

September 14, 2006

ENVIRONMENTAL COORDINATION SERVICES

Ms. Lori Lawrence
 Placer County Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive
 Auburn, CA 95603

**SUBJECT: REVISED DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
 PLACER VINEYARDS SPECIFIC PLAN**

Dear Ms. Lawrence:

The Sacramento County Department of Transportation has reviewed the Revised Draft Environmental Impact Report (DEIR) for the Placer Vineyards Specific Plan dated July 2006. We appreciate the opportunity to review this document and have updated our May 18, 2006 comment letter as follows:

1. The Revised DEIR identifies significant impacts and mitigation measures in Sacramento County in the existing plus project scenario. The document states that the Specific Plan must pay its fair share toward various improvements in Sacramento County (i.e. pages 4.7-45 and 4.7-48 mitigation measures 4.7-5b and 4.7-6b). According to Sacramento County policy and because the project causes the impact, the Specific Plan should pay the entire cost of the improvement rather than a fair share. Further discussion should be had with Sacramento County to identify acceptable financing for these improvements. Note: Please make sure to coordinate with other County Departments (i.e., Planning, DERA, SHRA, etc.) to make sure that the mitigation measures identified in the Specific Plan are consistent with these department goals. For instance, there is analysis along the Watt Avenue corridor that looks at alternative treatments to widening to 6 lanes. It is possible that the Specific Plan coordinate with the County to finance its fair share of whatever improvements are identified in those analyses. A
2. The Revised DEIR also identifies a handful of significant impacts and mitigation measures for Sacramento County in the cumulative plus project scenario. The Specific Plan should be required to pay its fair share towards these various cumulative condition improvements in Sacramento County (see pages 4.7-79 and 4.7-82 and mitigation measures 4.7-15b and 4.7-16b). Further discussion should be had with Sacramento County to identify acceptable financing for these improvements. B

Ms. Lawrence
 September 14, 2006
 Page 2 of 3

3. Mitigation measure 4.7-2.8a does reference the collection of fees for a fair share of mitigation measure costs that are identified based on Specific Plan significant impacts that will occur in Sacramento County. Sacramento County supports and requests the establishment of a funding source and requests that Placer County meet with Sacramento County to identify and present the cost estimates of the improvements identified in the Revised DEIR for inclusion in a Placer County managed Public Facilities Financing Plan. Sacramento County is concerned that only asking the Specific Plan to pay for its "fair share" will not mitigate the traffic impacts to less than significant. Therefore, we request that the Specific Plan identify any additional funding that will be required to implement the recommended mitigation measure. The cost shares and the specific mitigation measures should be discussed and agreed upon by the two counties (see comments 1 and 2).
4. The financing plan should also consider and possibly incorporate the funding for an additional capital improvement project that currently exists as an alternative in the Elverta Specific Plan that was recently approved by the Sacramento County Planning Commission. This Specific Plan has yet to go before the Sacramento County Board of Supervisors but will do so in the next few months. This project is identified as the connection of 16th Street across the Dry Creek Parkway and is shown to add additional north to south roadway capacity in this area of Sacramento County. Since the Placer Vineyards Specific Plan will add significant amounts of traffic to the roadways in this area this could be considered as a possible mitigation measure in Sacramento County and the funding of this identified improvement should be included in any Public Facilities Financing Plan that is prepared for the Placer Vineyards Specific Plan. This assumes the Sacramento County Board of Supervisors approves this connection alternative when hearing the Elverta Specific Plan.
5. Sacramento County also supports the identified mitigation measure that requires the Placer Vineyard Specific Plan to fund identified improvements to the State highway facilities that will add more capacity necessary to support the project impacts associated with this plan. Placer County should coordinate this requirement with Caltrans.
6. Some of the roadway sections show that Watt Avenue in Placer County will contain right-of-way for a dedicated BRT line. Sacramento County is concerned about what will happen when Watt Avenue crosses into Sacramento County and this right-of-way does not exist? Does Regional Transit have BRT identified on any regional plan? Please clearly indicate how this transit service is expected to operate within Sacramento County and reflect the appropriate "after service" level of services.
7. The transportation Plan of the Sacramento County General Plan provides for additional north-south mobility between Sacramento and Placer Counties in this area. In addition to 16th Street, the Elverta Specific Plan proposes to extend Palladay Road (two-lane rural collector) into Placer County. To maintain adequate mobility between Placer and Sacramento County as envisioned by the General Plan, the Department of Transportation recommends that Palladay Road be extended to the Sacramento County line and that all existing street connections between counties remain open.

C

D

E

F

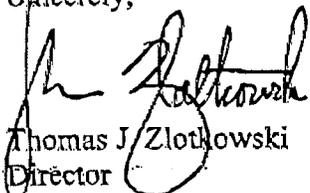
Ms. Lawrence
September 14, 2006
Page 3 of 3

8. We recommend that the development of triggers for the construction of improvements based on number of dwelling units be included in the Public Facilities Financing Plan. This will insure that infrastructure will get constructed when needed as the progress of development occurs.

G

If you have any questions, please feel free to contact me at 874-6291.

Sincerely,


Thomas J. Zlotkowski
Director
Department of Transportation

TJZ:mgd

c: Terry Schutten, CE
Cheryl Creson, Administrator
Robert Sherry, Planning
Judy Robinson, Planning
Steve Hong, IFS
Rich Blackmart, IFS
Dan Shoeman, DOT
Dean Blank, DOT
Matt Darrow, DOT
Theron Roschen, DOT

LETTER 48 THOMAS ZLOTKOWSKI, COUNTY OF SACRAMENTO DEPARTMENT OF TRANSPORTATION

Response 48A: Commenter states that Sacramento County policy requires a project to pay the entire cost of an improvement rather than its fair share. See Response to Comment 20A.

Response 48B: Commenter requests fair share payments for cumulative impacts. See Response to Comment 20B.

Response 48C: Commenter requests that any additional funding, in addition to fair share, be identified. See Response to Comment 20A.

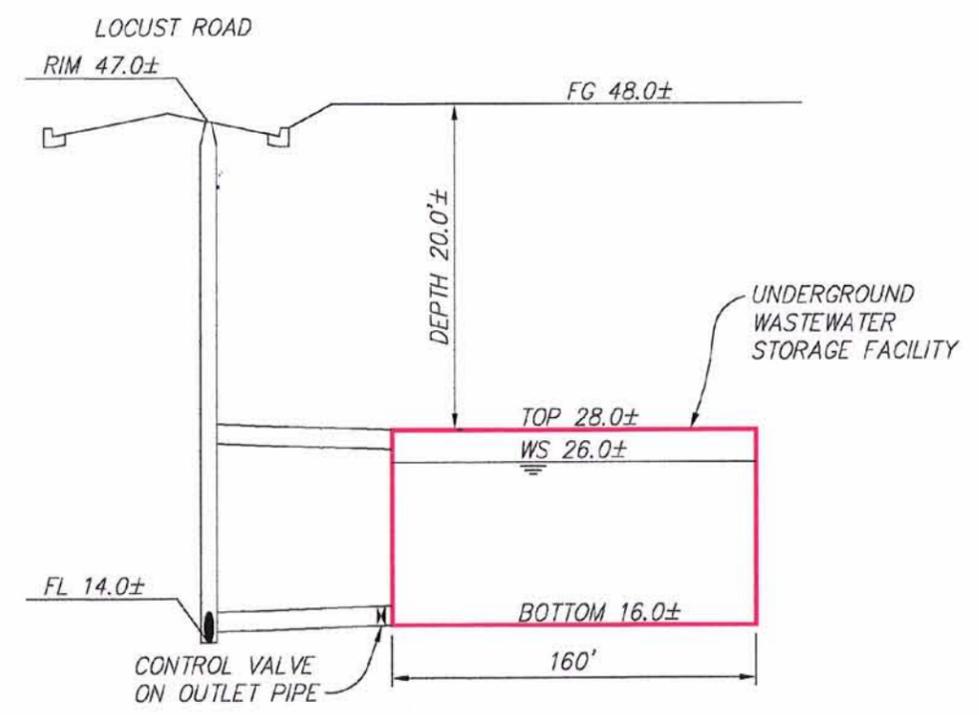
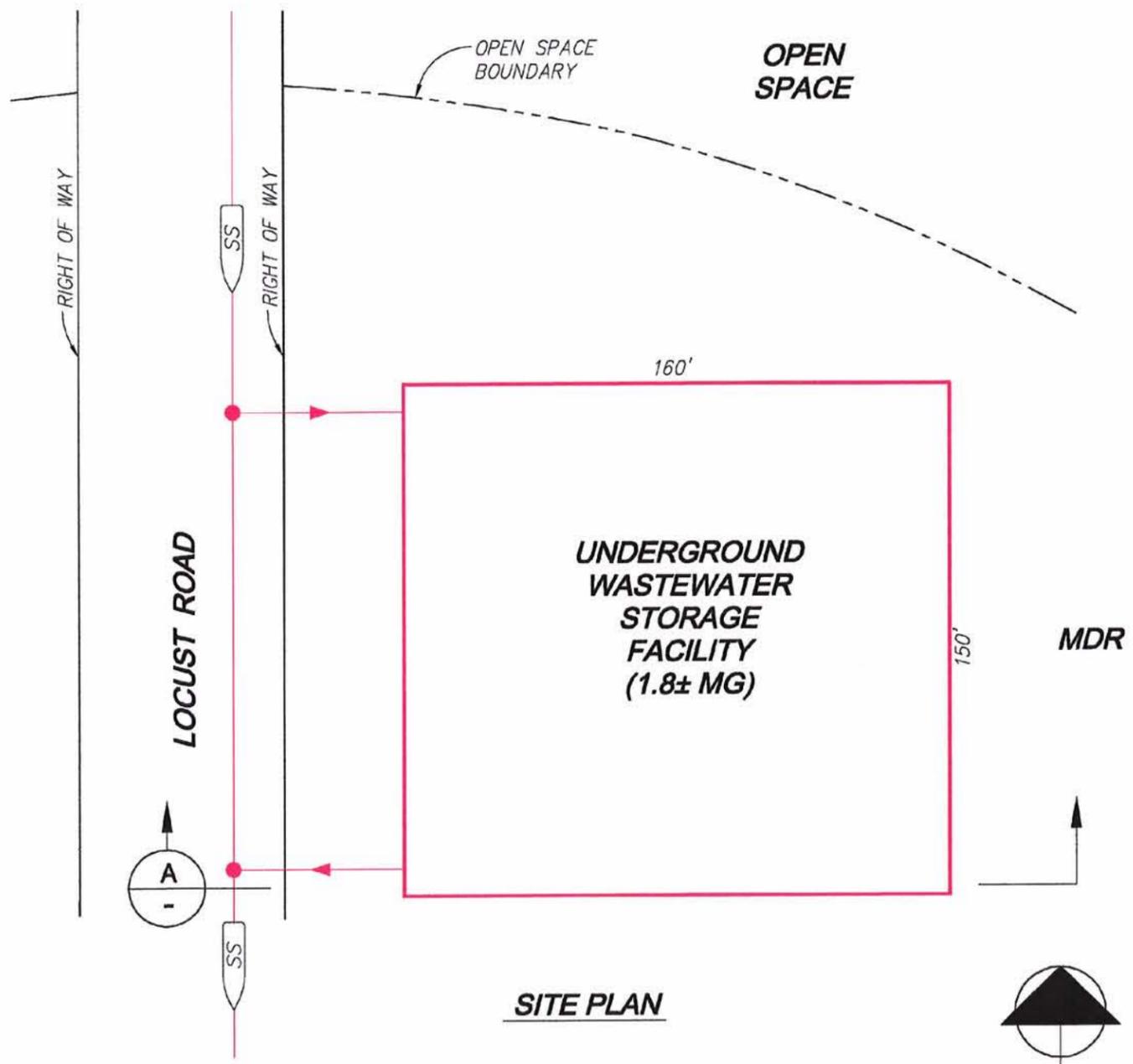
Response 48D: Commenter wants consideration given to the connection of 16th Street across Dry Creek Parkway. See Response to Comment 20D.

Response 48E: The commenter's support for the mitigation measures to address impacts on State highways is noted.

Response 48F: Commenter requests information about BRT right-of-way, operations, and service levels in Sacramento County. See Response to Comment 20H. Planning for BRT has not proceeded to the point where operational details and service levels have been established for BRT.

Response 48G: Commenter requests that all roadways between Sacramento County and the Placer Vineyards Specific Plan remain open and be extended. See Response to Comment 20I.

Response 48H: The commenter recommends that development triggers for the construction of improvements based on number of dwelling units be included in the Financing Plan. Comment noted. The Financing Plan already contains triggers for key infrastructure improvements (see Financing Plan Chapter IV). Additional triggers and detail are provided in the Development Agreement.



A **TYPICAL SECTION**
N.T.S.

* ELEVATIONS AND DIMENSIONS ARE SUBJECT TO CHANGE DURING FINAL DESIGN

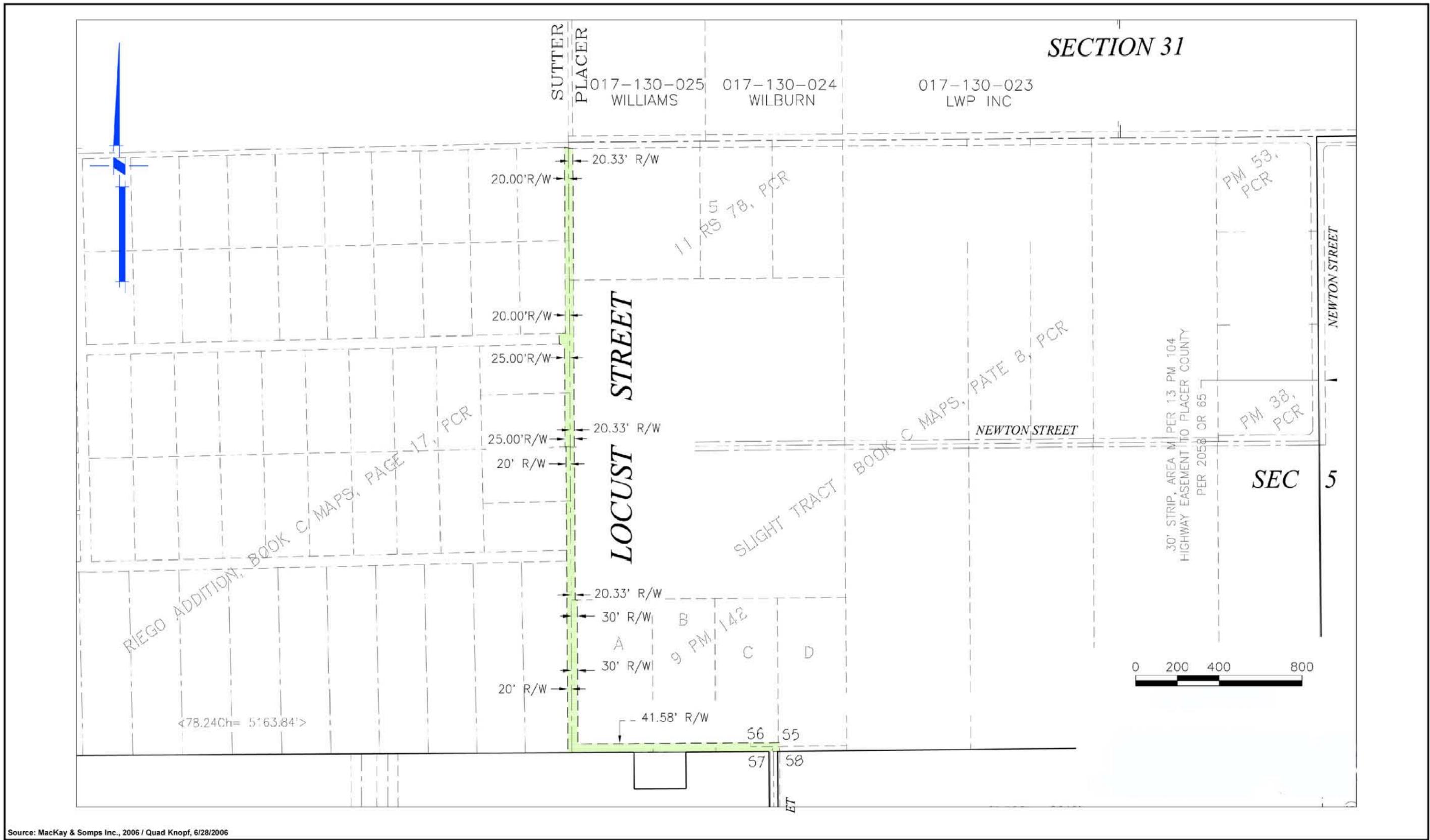
Source: MacKay & Soms Inc., 2006 / Quad Knopf, 2006



PLACER VINEYARDS SPECIFIC PLAN
UNDERGROUND WASTEWATER STORAGE FACILITY - SRCSD GRAVITY SEWER ALTERNATIVE

Figure 1

Job No: 97216

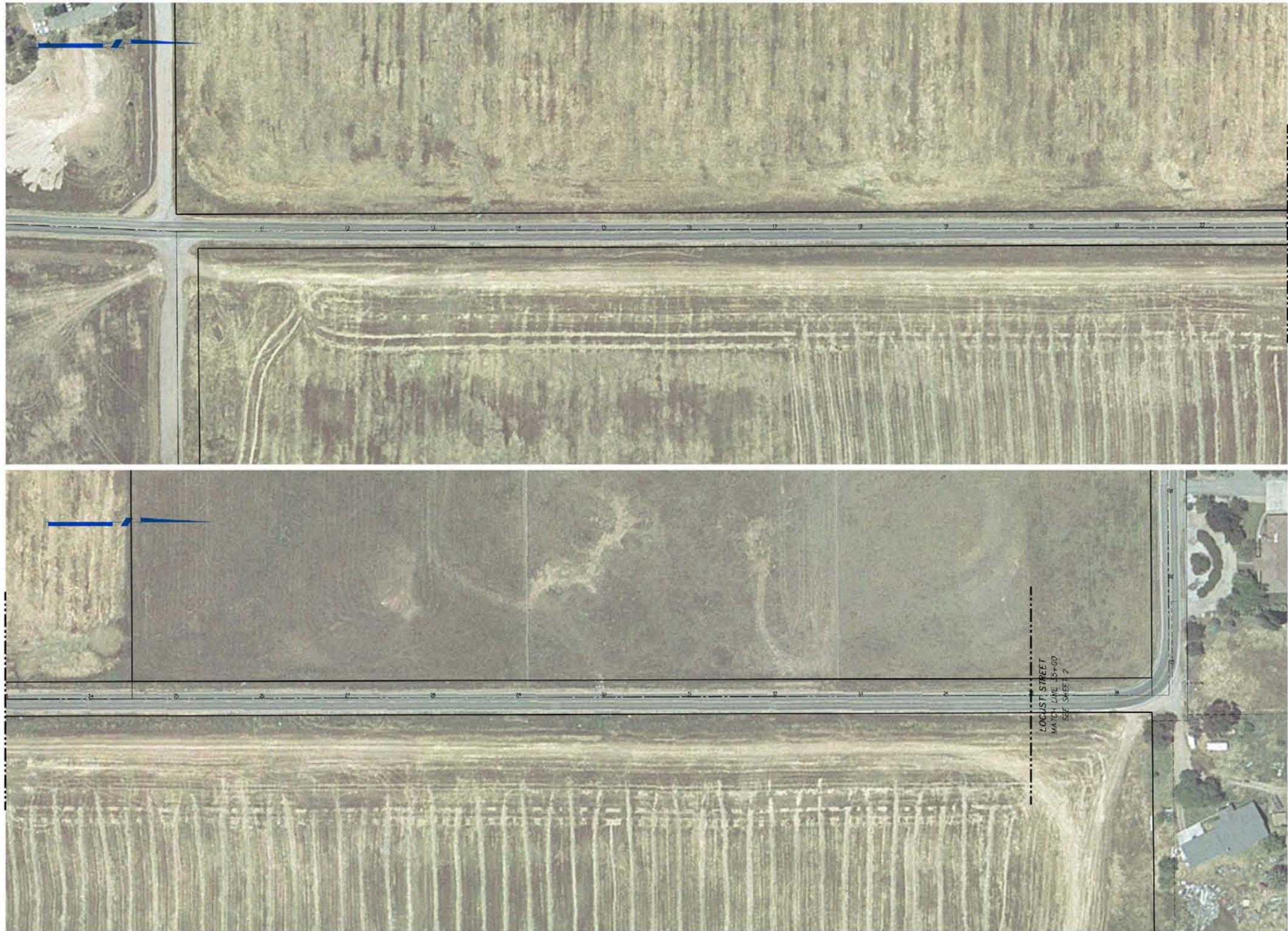


Source: MacKay & Soms Inc., 2006 / Quad Knopf, 6/28/2006



**PLACER VINEYARDS SPECIFIC PLAN
LOCUST STREET RIGHT-OF-WAY**

Figure 2A



Source: MacKay & Soms Inc., 2006 / Quad Knopf, 6/28/2006



PLACER VINEYARDS SPECIFIC PLAN
PROPOSED LOCUST STREET ALIGNMENT SHEET 1

Figure 2B



Source: MacKay & Soms Inc., 2006 / Quad Knopf, 6/28/2006



**PLACER VINEYARDS SPECIFIC PLAN
PROPOSED LOCUST STREET ALIGNMENT SHEET 2**

Figure 2C

LOCUST STREET
MATCH LINE 62+00
SEE SHEET 2

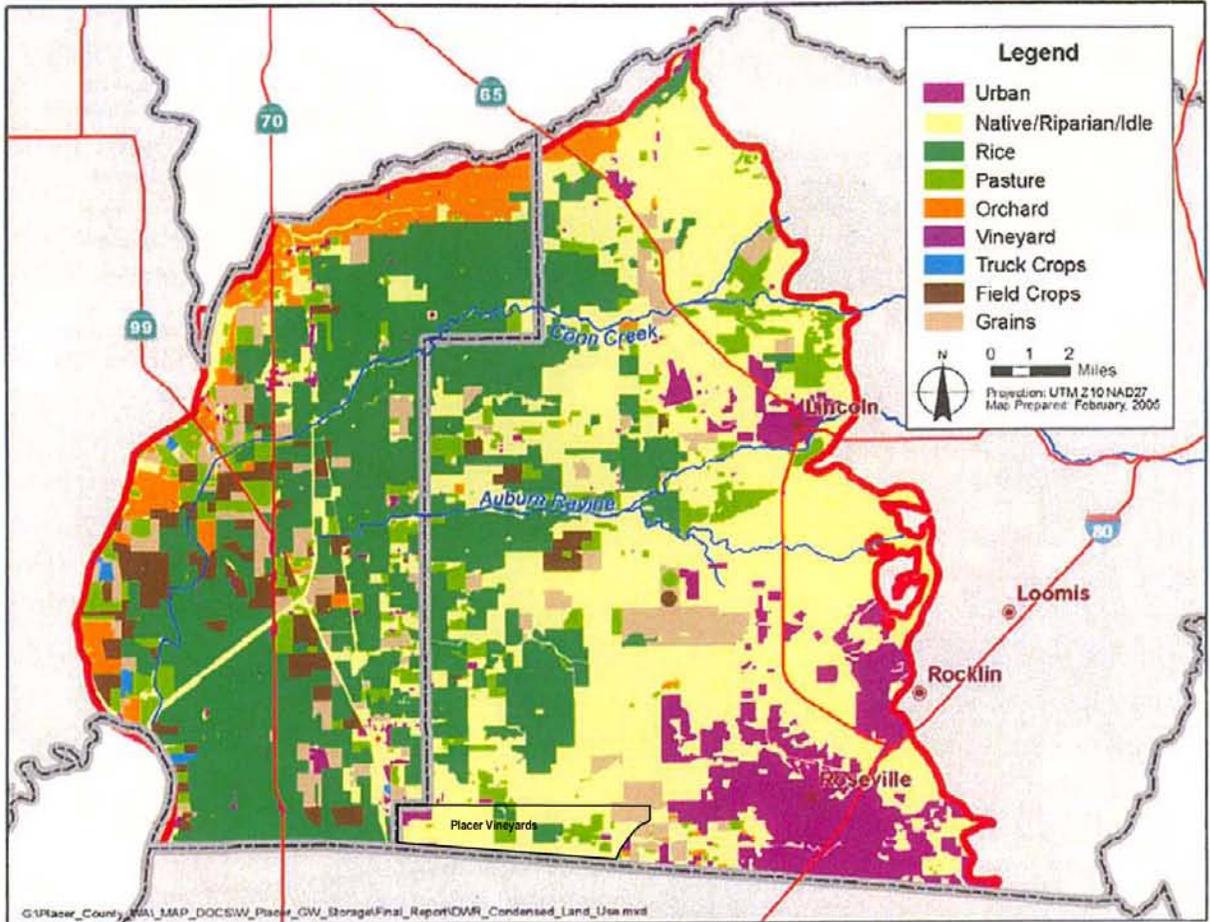


Source: MacKay & Soms Inc., 2006 / Quad Knopf, 6/28/2006



PLACER VINEYARDS SPECIFIC PLAN
PROPOSED LOCUST STREET ALIGNMENT SHEET 3

Figure 2D



**Figure 2-3. DWR Cropping Land use Survey Data:
 Placer County Year 1994 and Sutter County Year 1998**

Source: Western Placer County Groundwater Storage Final Report, 2005 / Quad Knopf, 2006



**PLACER VINEYARDS SPECIFIC PLAN
 WESTERN PLACER COUNTY
 LAND USE AND WATER DEMANDS**

Figure 3A

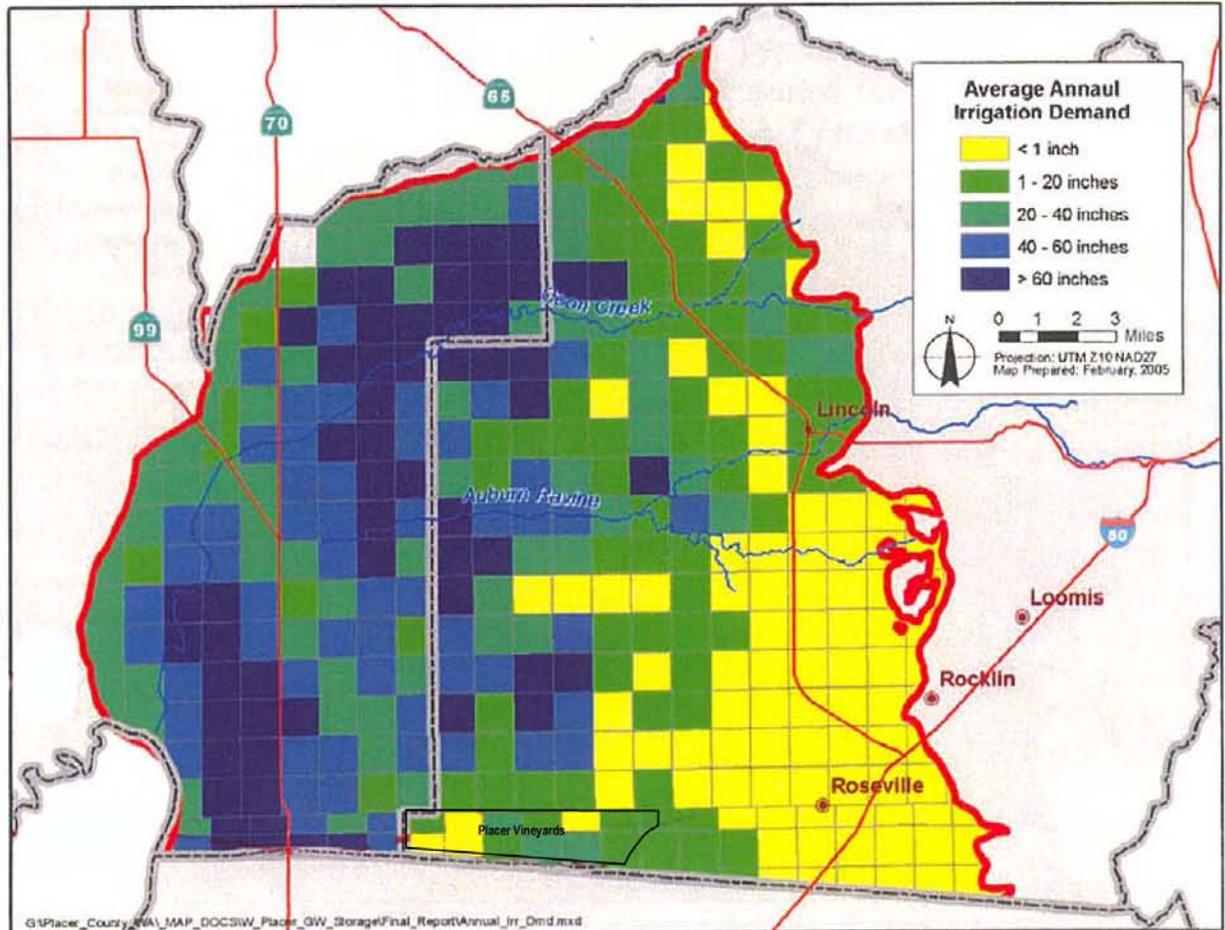
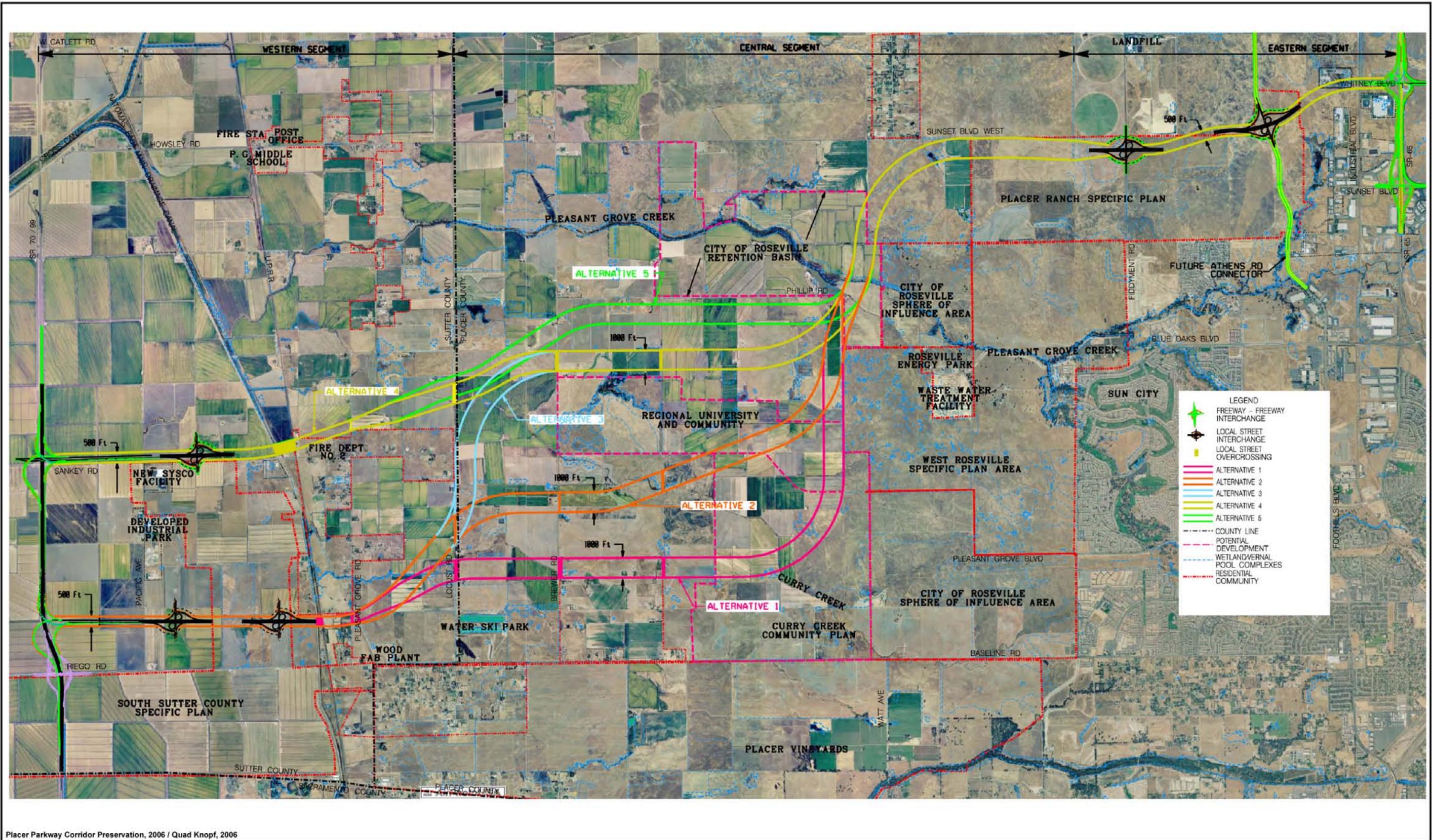
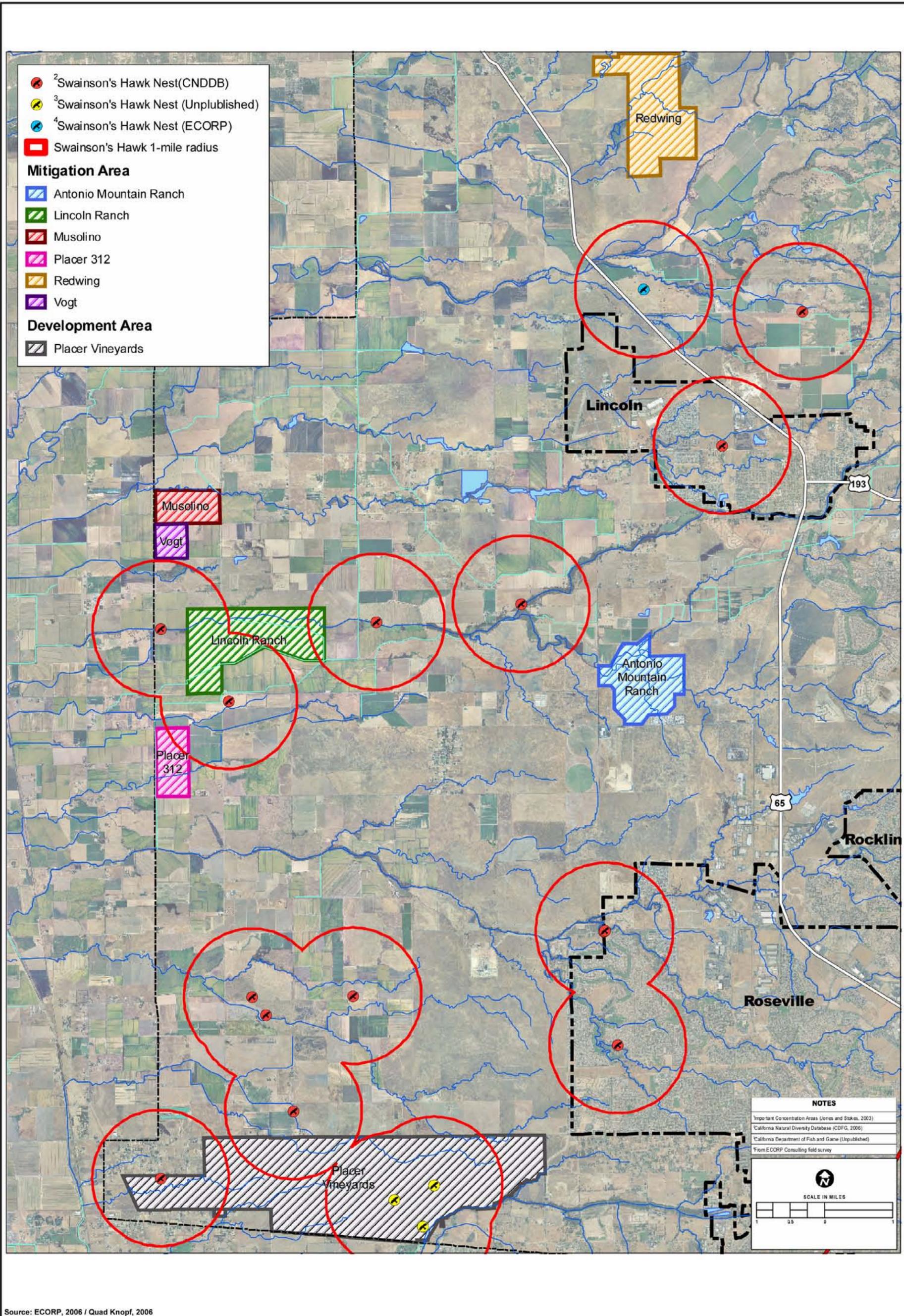


Figure 2-4. Average Annual Agricultural Irrigation Demand (in Public Land Survey Grid from Bureau of Land Management)

Source: Western Placer County Groundwater Storage Final Report, 2005 / Quad Knopf, 2006





Source: ECORP, 2006 / Quad Knopf, 2006

Job No. 19718

Pacific Flyway



Flyways within the United States

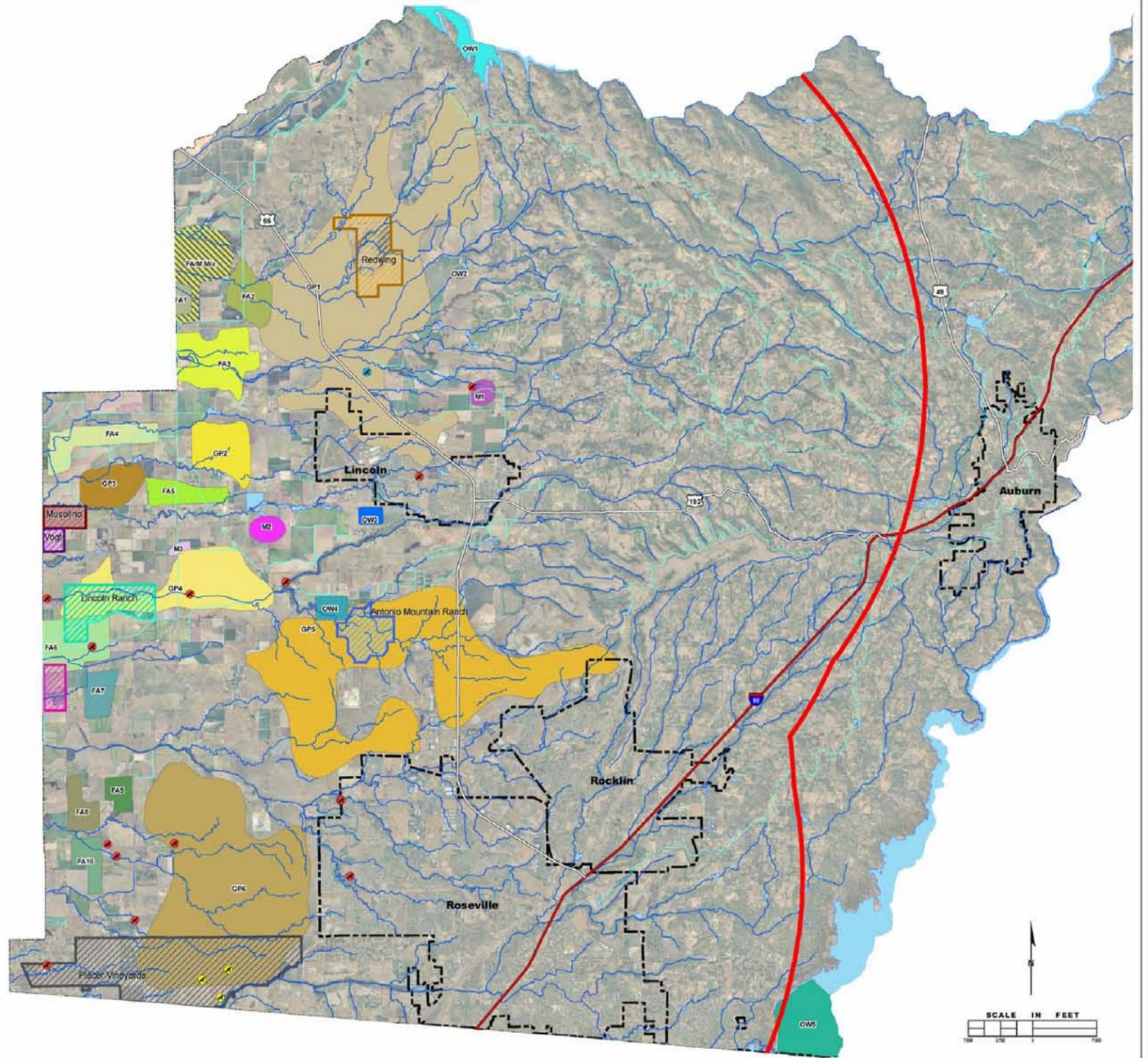


- Important Concentration Areas**
- Flooded Agriculture Areas:** FA1, FA2, FA3, FA4, FA5, FA6, FA7, FA8, FA9, FA10, FA/M Mix
 - Marsh Areas:** M1, M2, M3
 - Open Water Areas:** OW1, OW2, OW3, OW4, OW5
 - Grassland Pasture Areas:** GP1, GP2, GP3, GP4, GP5, GP6
 - Swainson's Hawk Data:**
 - Swainson's Hawk Nest
 - Swainson's Hawk Nest (Unpublished)
 - Swainson's Hawk Nest (ECORP)
 - Swainson's Hawk 10-mile radius
 - Property Boundaries:**
 - Mitigation Area: Antonio Mountain Ranch, Lincoln Ranch, Musolino, Placer 312, Redwing, Vogt

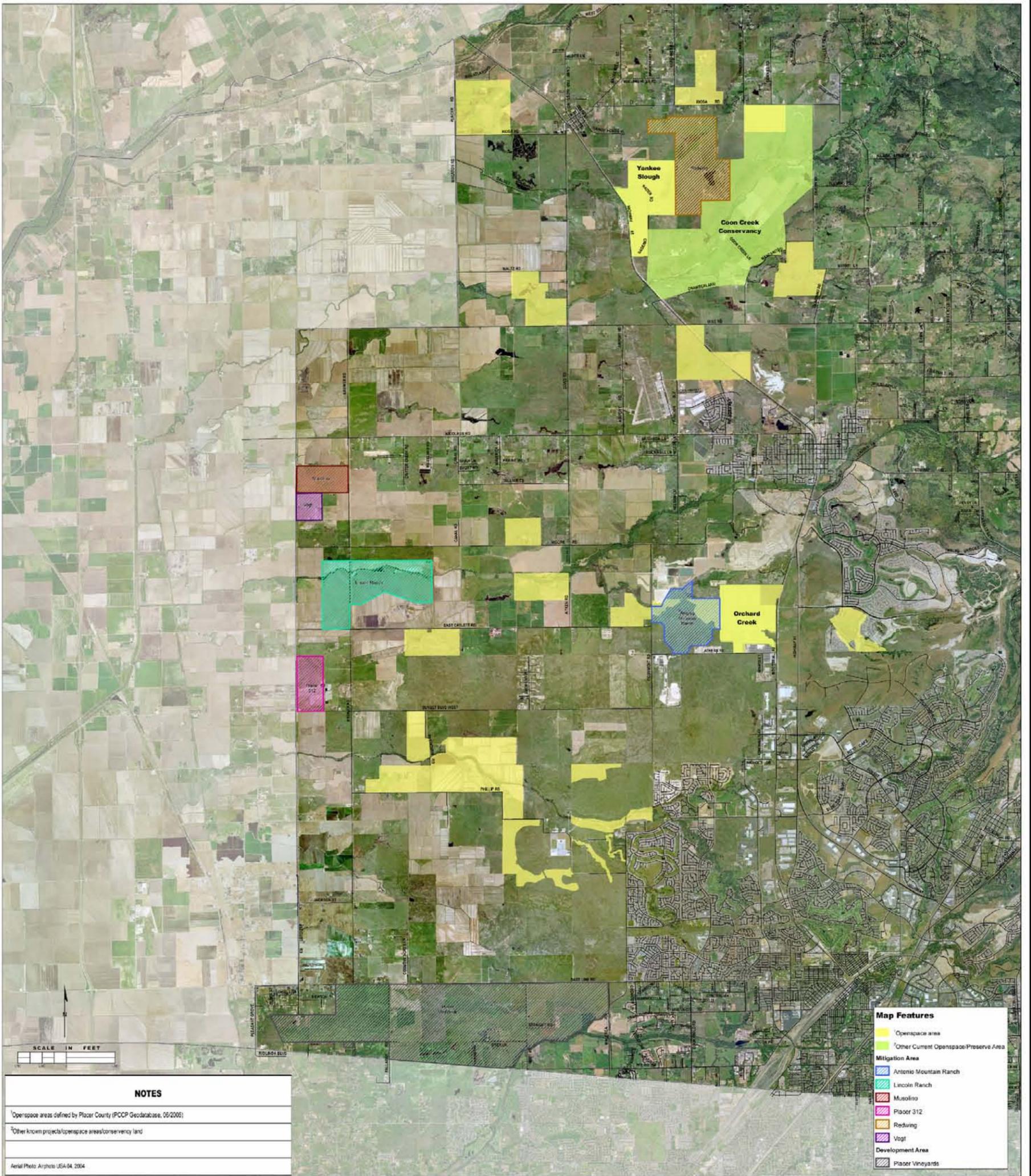
Classification	Impact Area						Mitigation Area				Total
	Placer Vineyards	Antonio Mountain Ranch	Lincoln Ranch	Musolino	Placer 312	Redwing	Vogt				
Important Concentration Areas											
FA6	0.0	0.0	194.6	0.0	51.1	0.0	0.0	0.0	0.0	245.8	
GP1	0.0	0.0	0.0	0.0	0.0	528.3	0.0	0.0	0.0	528.3	
GP3	0.0	0.0	0.0	1.7	0.0	0.0	0.0	0.0	0.0	1.7	
GP4	0.0	0.0	676.6	0.0	0.0	0.0	0.0	0.0	0.0	676.6	
GP5	0.0	659.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	659.2	
GP6	2152.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2152.4	
OW4	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	
Total ICA Area	2152.4	659.9	871.2	1.7	51.1	528.3	0.0	0.0	0.0	2112.2	
Area not listed	2103.1	0.2	212.6	292.2	257.5	497.3	148.2	0.0	0.0	1407.9	
Total	4255.6	660.1	1083.8	293.9	308.6	1025.5	148.2	0.0	0.0	3520.1	

NOTES

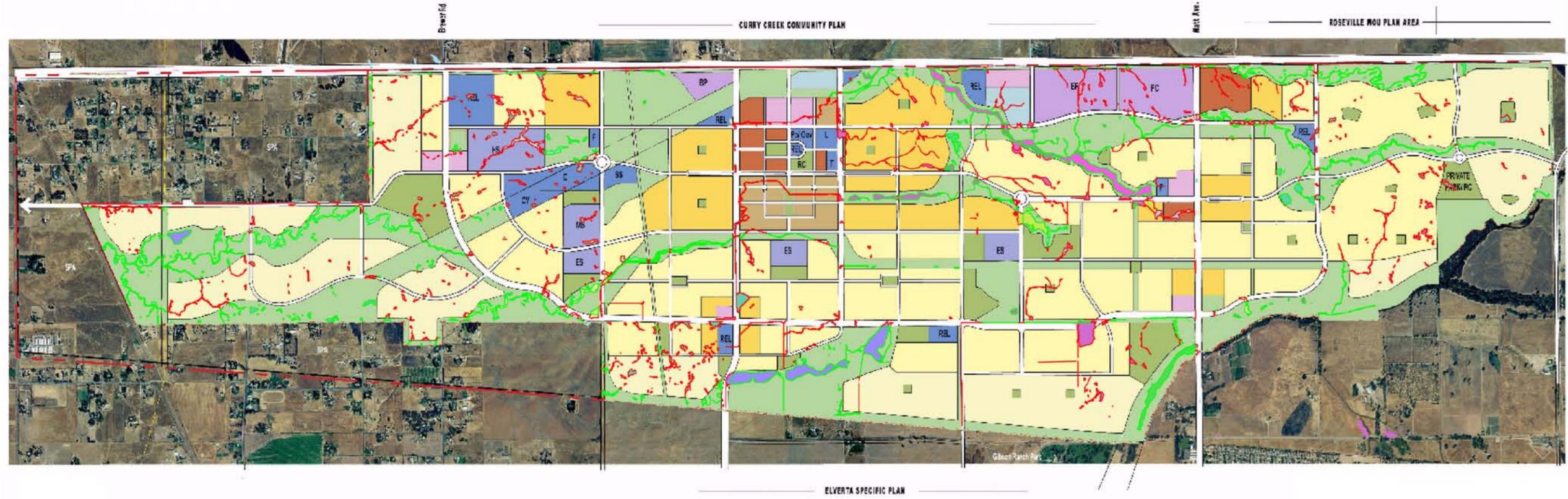
- Important Concentration Areas (Jones and Oliver, 2001)
- California Natural Diversity Database (CNDDB, 2006)
- California Department of Fish and Game (unpublished)
- From ECORP Consulting Bird Survey



Source: ECORP, 2006 / Quad Knopf, 2006



Source: ECORP, 2006 / Quad Knopf, 2006



LEGEND

- | | | | | |
|---|---|---|---|---|
| CMU COMMERCIAL MIXED USE | SPA SPECIAL PLANNING AREA | ES ELEMENTARY SCHOOL | REL RELIGIOUS FACILITY | OS OPEN SPACE |
| COR COMMERCIAL | RR RURAL DENSITY RESIDENTIAL | MS MIDDLE SCHOOL | F FIRE | P PARK |
| PC POWER CENTER | LDR LOW DENSITY RESIDENTIAL | HS HIGH SCHOOL | Gov GOVERNMENT | RC RECREATION CENTER |
| BP BUSINESS PARK | MDR MEDIUM DENSITY RESIDENTIAL | | L LIBRARY | PROPERTY BOUNDARY |
| O OFFICE | HDR HIGH DENSITY RESIDENTIAL | | POL POLICE | |
| | | | CY CORPORATE YARD | |
| | | | SS SUBSTATION | |
| | | | T TRANSIT | |
| | | | C CEMETERY | |

	Impact	Avoided	Total
Channel	0.04	1.41	1.45
Creek	0.15	5.64	5.79
Drainage Canal	0.49	0.29	0.78
Drainage Ditch	0.15	0.00	0.15
Drainage Swale	0.61	1.47	2.09
Ephemeral Creek	2.91	1.25	4.17
Irrigation Ditch	1.58	16.26	17.83
Pond	0.96	17.11	18.07
Riverine Perennial Marsh	0.21	0.37	0.58
Riverine Seasonal Marsh	0.98	4.52	5.50
Riverine Seasonal Wetland	6.95	9.80	16.75
Seasonal Marsh	0.17	0.04	0.21
Seasonal Wetland	18.26	9.34	27.60
Seasonal Wetland Swale	7.88	7.70	15.58
Stock Pond	2.04	2.98	5.02
Vernal Pool	19.66	14.89	34.55
Total	63.03	93.08	156.12

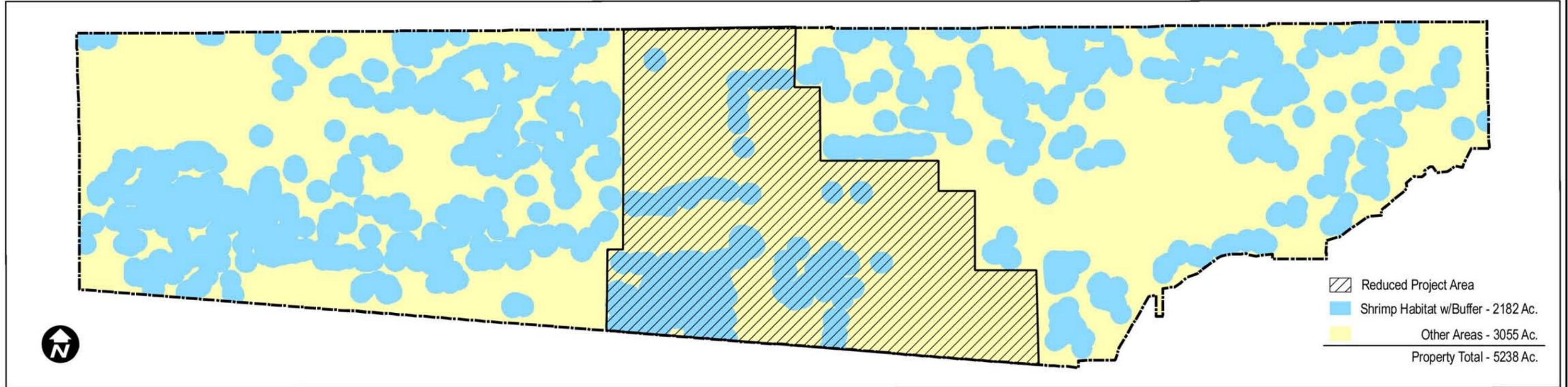
*Note: Wetland totals may be affected by rounding errors.
 J:\GIS_Maps\2001-194_Planer_Vineyards\MapSeries_Analysis\219_Create\20% Pressure results\roaddata\4\plan_imp_unroad_Crossab

Source: EDAW, 2006 / Quad Knopf, 2006



**PLACER VINEYARDS SPECIFIC PLAN
 REDUCED DENSITY ALTERNATIVE LAND USE PLAN WITH WETLAND FEATURES**

Figure 8



Source: ECORP, 2006 / Quad Knopf, 2006



Source: MacKay & Soms Inc., 2006 / Quad Knopf, 2006



PLACER VINEYARDS SPECIFIC PLAN
PRELIMINARY INTERSECTION CONFIGURATION - BASELINE ROAD / WALERGA ROAD / FIDDYMENT ROAD

Figure 10