NOTICE OF PREPARATION

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Interested Parties

SUBJECT: Supplemental Notice of Preparation of a Draft Environmental Impact Report for Placer Vineyards Specific Plan, Focusing on Interim and Long-Term Water Supply (SCH #1999062020)

LEAD AGENCY: Placer County Planning Department
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CONTACT: Lori Lawrence, Planning Technician I

Placer County is preparing an Environmental Impact Report (EIR) as required under the California Environmental Quality Act (CEQA) to evaluate potential impacts associated with the implementation of the Placer Vineyards Specific Plan in southwestern Placer County, California. A previous Notice of Preparation (NOP) describing all the probable environmental effects associated with this proposal was circulated in June of 1999.

As part of the EIR, potential water supply and related impacts must be evaluated. This revised NOP is being distributed due to a change in the project proposal related to the proposed water supply. It is now proposed that the project’s water needs would be met by the Placer County Water Agency (PCWA) supplying water from a new diversion in the Sacramento River to the west of the project. It is also proposed that an interim supply of water would be provided through a cooperative agreement between the Placer County Water Agency, Northridge Water Company, San Juan Suburban Water District, and Citizen’s Utilities Company of California. The interim supply of water would be treated by the San Juan Suburban Water District and distributed to the Placer Vineyards project site through the San Juan/Northridge cooperative transmission pipeline. We request review and comments from your agency as to the scope and content of the environmental information relating to water supply which is germane to your agency’s statutory responsibilities in connection with the proposed project. If you are commenting as a responsible or trustee agency, your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, vicinity map, and potential environmental effects regarding water supply are contained in the attached materials.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than June 18, 2001.

Please send your response to Lori Lawrence, Placer County Planning Department at the address indicated above. We request the name of a contact person for your agency.

Project Title: Placer Vineyards Specific Plan

Project Location: The proposed project is located in southwest corner of Placer County. The Plan area is bounded on the north by Baseline Road, on the south by the Sacramento-Placer County line, on the west by the Sutter-Placer County line, and on the east by Walerga Road.

Project Description: The proposed project includes 5,158+ acres. Development includes employment, commercial, residential, open space, recreational and public/quasi-public land uses. Project build out will likely occur over a 30-50 year time period.

Date

FRED YEAGER
Planning Director

Reference: California Code of Regulations, Title 14 (CEQA Guidelines) Sections 15082(a), 15103, 15375
Placer Vineyards Specific Plan EIR
Water Supply Alternatives Briefing Memorandum

INTRODUCTION

Placer County is preparing an Environmental Impact Report (EIR) as required under the California Environmental Quality Act (CEQA) to evaluate potential impacts associated with the implementation of the Placer Vineyards Specific Plan in southwestern Placer County, California. As part of the Placer Vineyards Specific Plan, potential water supply and related impacts must be evaluated. The purpose of this briefing memorandum is to describe the interim water supply proposed for the project as well as develop a reasonable range of water supply alternatives. Interim and long-term water supply alternatives that pass a screening process and the Proposed Interim Water Supply will be evaluated in the EIR. Both interim and long-term water supply alternatives are included in the screening process because many of the long-term alternatives cannot be operational until after the proposed first phase of development of this project.

This briefing memorandum describes the range of potential water supply alternatives, the screening process that is subsequently applied to eliminate infeasible alternatives, and the relative merits of each alternative in the context of the applied screening criteria. The interim water supply alternatives will be subject to the same CEQA screening criteria and evaluation process as the long-term alternatives.

The information contained in this memorandum is an important part of the project’s administrative record, serving as documentation for the selection of the EIR water supply alternatives. It is intended that this memorandum be distributed to relevant public trust resource agencies and other interested or affected parties, as determined by the lead agency and project team. Comment and/or input will be solicited from all recipients, carefully considered within the project team decision-making process, and included in the EIR documentation record.

SCREENING CRITERIA

The criteria used to screen the water supply alternatives are applied to determine which alternatives are practicable and warrant further detailed consideration in the EIR. The specific screening criteria are identified below, followed by a summary of the considerations associated with each criterion. Notably, an alternative may turn out to be viable without necessarily satisfying all criteria. An optimal alternative may reflect a balancing of the various criteria.

RELIABILITY CRITERION

An alternative alone, or in combination with another alternative or other alternatives, must be capable of supplying water during all years.

Water supply reliability is a critical element within urban water supply planning. Providing a consistently available water supply to customers is an underlying objective of all water purveyors. However, providing a "guaranteed" water supply under all circumstances is not
always possible, and thus reliability planning requires the investigation of the relationship between the risk of shortage, the consequences of incurring that shortage, the cost of minimizing the effects of that shortage, and the cost of avoiding the shortage.

Meteorological conditions determine, to a large extent, surface water availability in California and dictate the annual and seasonal water availability for any number of end uses. Under "wet" and "above-normal" hydrologic conditions, available surface water supply is generally considered adequate to meet existing and many future demands. As surface water supply availability is reduced, however, curtailment of water deliveries for many consumptive uses becomes necessary. The ability of such end users to meet their water needs with alternative sources, therefore, becomes an important planning consideration under such inevitable situations.

The respective reliability of alternative water supplies is differentiated by the nature (i.e., entitlement type) of the water source. For instance, an existing Central Valley Project (CVP) surface water supply through a U.S. Bureau of Reclamation (USBR) water service contract may be subject to annual reduction due to water supply shortages within the CVP. Municipal and industrial CVP water service contractors are subject to deficiencies of up to 50 percent of their contract amount in water short (i.e., dry or critical) years. The reliability of a water supply, therefore, can be determined by the potential risk that the supply might not be available in all years. For water supply planning, the risk of water shortage should be at least minimized, if not eliminated.

**GROUNDWATER DEPLETION CRITERION**

*An alternative cannot adversely deplete the groundwater aquifer from a basin-wide groundwater perspective.*

Groundwater pumping has, for many years, exceeded groundwater recharge in the southern portion of the North American River Groundwater Basin, which underlies northern Sacramento County and western Placer County. With groundwater recharge unable to maintain equilibrium with pumping, the groundwater aquifer has not been able to stabilize. Records of groundwater levels indicate that in some areas, the phreatic zone has fallen, in some cases, significantly. The declining groundwater basin in western Placer County has had substantial adverse economic impacts upon existing residents through the cost of lowering many individual wells, and upon agriculture by increasing the delivered cost of water to near the price tolerance level for the agricultural economy. The lower groundwater levels resulting from prolonged additional pumping from the underlying aquifer also leads water utilities to pass on to customers their increased costs of providing groundwater. Additional pumping also may lead to degraded groundwater quality due to an upward migration of low quality, non-potable water from deeper formations, which could result in the need for groundwater treatment prior to delivery. Increased groundwater pumping also could potentially contribute to the adverse movement of groundwater contaminants.

Consequently, Placer County has established the following policy in their General Plan (Placer County, August 1994):

- Water Supply and Delivery Policy: Urban and suburban development should rely on public water systems using surface supply (Policy 4.C.2.a).
In the Dry Creek West Placer Community Plan, which includes the Placer Vineyards area, a specific policy was developed to protect the existing aquifer—a surface water supply must be acquired as a precursor to development in the Community Plan area (Placer County 1990). This policy is expressed in the following statements:

- **Water Supply Goal:** To provide a source of treated and untreated surface water for all future development in the plan area including agriculture.

- **Water Supply Policy:** Require that a new surface water source for domestic use be developed along with the first new residential development in the Plan area and ensure that all future commercial, industrial, residential, or public use provide for the extension of such a system.

Notwithstanding, PCWA prefers to have groundwater available to improve system reliability in case of emergencies or surface water shortages during drought situations.

**TECHNICAL AND PHYSICAL CRITERIA**

There cannot be significant doubt of an alternative's technical feasibility or reliability.

An alternative must be based on existing, proven technology to provide a water supply that is capable of reliably meeting the existing and long-term water needs of the project. Further, the alternative must not be dependent on the availability of physical sites or facilities that cannot be reasonably assured to be available, or at such locations that may be subject to unacceptable risks due to geologic or hydrologic sensitivity or other hazard.

**ENVIRONMENTAL CRITERION**

An alternative should not have unacceptable environmental impacts.

One alternative or category of alternatives may have potential environmental impacts far greater than other alternatives. It also may be flawed at the onset of evaluation due to unacceptable environmental consequences. Those alternatives with significant environmental impacts that would normally be considered unacceptable will be screened from further consideration unless overriding policies dictate that the alternative be carried forward. This criterion will be satisfied by strict adherence to the principles of CEQA.

**INSTITUTIONAL AND LEGAL CRITERIA**

An alternative cannot possess significant uncertainty that permits, licenses, agreements, or other logistical requirements cannot be reasonably obtained and maintained.

An alternative may not be practicable if the institutional and legal hurdles that must be overcome to implement the alternative are so numerous that it is impracticable from a time and cost standpoint to pursue the alternative. A second aspect of this criterion is that the alternative
cannot be subject to regulatory violation or uncertainty; the latter could render the alternative unreliable or impracticable in the future. Several institutional and legal obstacles and uncertainties to implementing the potential interim and long-term water supply alternatives have been identified by PCWA (Wollan 1999); these obstacles are described under the specific alternatives.

The Dry Creek West Placer Community Plan water supply policy (described under the Groundwater Depletion Criterion), which requires a surface water supply as a precursor to development in the area where Placer Vineyards is located, also would need to be satisfied under Institutional and Legal Criteria.

**ECONOMIC CRITERION**

*An alternative cannot be economically impracticable or infeasible. Additionally, an alternative's total costs (including capital and operation costs) should not significantly exceed the costs of an alternative action, which provides a water supply of functional equivalence.*

Each alternative will have a cost associated with its full implementation. In addition to infrastructure capital expenditure, costs include those required for engineering design, environmental studies, economic analyses, public education and outreach, and administrative processing. Additional costs would include those involving ongoing operation and maintenance. In some instances, there will be a clear distinction between alternatives as to the magnitude of these total costs. In any assessment of potential project costs, an economic evaluation of alternatives based on the complexity of the project agreements (i.e., multi-functional or multi-party arrangements) also is necessary. Potential alternatives may be sized large for purposes of economies of scale and to accommodate the multiple functions and multi-party aspects.

Alternatives with identifiably significant greater costs than other alternatives, which can provide a functionally equivalent water supply, may not be practical from an economic perspective.

**PUBLIC HEALTH CRITERION**

*An alternative must provide a water supply that meets state and federal water quality standards or other applicable water quality standards associated with its use.*

Alternatives must be capable of providing water supplies that, following treatment, are of sufficient quality to meet the needs of the proposed project. Alternatives must be capable of providing a quality of water that meets existing state and federal water quality standards and anticipated changes to state and federal standards.

**TIMING CRITERION**

*An alternative must provide a water supply attainable within a reasonable timeframe, and prior to actual development.*
All of the identified alternatives require some element of time to develop and fully implement. Significant effort and expense is required to develop and implement water supply alternatives, both in logistical effort (including the obtaining of all permits and approvals) and in the effort to construct the necessary infrastructure. Short-lived alternatives will likely not be cost-effective unless there is a reasonable expectation that another action or program will succeed the short-lived alternative within a reasonable timeframe.

PRELIMINARY ALTERNATIVES IDENTIFICATION AND DEVELOPMENT

Buildout water demand for the Placer Vineyards project is approximately 13,000 acre-feet per year (AFA), based on the 14,132 dwelling units proposed in the Specific Plan. Buildout will be phased over a 20-year period, commencing at approximately 500 units per year. Initially, this buildout rate will correspond to a water need of approximately 700 AFA. Citizens Utilities Company of California has been identified as a potential water retailer for the project.

Placer County Water Agency (PCWA) has determined that it has sufficient water rights to meet the projected demands of projects likely to develop in western Placer County through the year 2030, including the Placer Vineyards Project. PCWA has a contract with Pacific Gas & Electric Company (PG&E) for water from the Yuba and Bear rivers to serve its Zones 1 and 3 areas, water rights through its Middle Fork Project (MFP), and also has a contract with the USBR for CVP water. However, PCWA currently has only minimal peak season treated surface water delivery infrastructure capable of serving the southwestern portion of Placer County where the Placer Vineyards project is proposed. There are physical and institutional limitations to the development of the new infrastructure necessary to use these water supplies that may significantly delay their availability. (These limitations are explained under the alternatives screening.)

Because significant capital costs and long lead times for permit processing and construction are required to implement the long-term surface water alternatives, sequencing (or phasing) of interim water supply alternatives may be necessary to facilitate short- and long-term water supply acquisitions until the first phases of development are in place. It is assumed for analytical purposes in the environmental documentation, however, that a long-term reliable water supply would be necessary in order to fully approve and implement the project. This is of particular concern because, although the interim water supply alternatives are subject to the same screening criteria as the long-term alternatives, some water supply alternatives may be available or acceptable on an interim basis, but not long-term.

LONG-TERM WATER SUPPLY ALTERNATIVES

Identification of a willing water supplier, long-term reliability (e.g., permanent transfer, temporary exchange), entitlement type (e.g., water right, water service contract), pattern of release, diversion location (i.e., North Fork American River, Folsom Reservoir, lower American River, or Sacramento River), and institutional constraints will influence the viability of specific surface water supply alternatives for this project.
Alternative 1 - Sacramento River Diversion - PCWA Supply

PCWA is signatory to the Sacramento Area Water Forum Agreement. Under that agreement, PCWA committed to attempt to divert approximately one-half of the new water it expects to need to meet the demands of its service area through 2030 (35,000 AF) from the Sacramento River. A Sacramento River diversion by PCWA, consistent with the Water Forum Agreement, could be made available to the Placer Vineyards Specific Plan area. However, in order for such a project to be implemented, numerous issues involving agreements and process-related arrangements would need to be addressed. In addition to the cost of the infrastructure necessary to convey Sacramento River water to PCWA’s service area in Placer County (including the proposed project area), the following processes would need to be addressed:

a) PCWA must first negotiate an exchange of its MFP water with an entity that has rights to divert from the Sacramento River, such as the United States, or an amendment to its CVP contract enabling diversion of that entitlement from the Sacramento River in addition to Folsom Reservoir;

b) Diversion and conveyance facilities must be designed and an EIR must be prepared evaluating the potential impacts of such diversion and conveyance facilities;

c) Any significant impacts that are identified in the CEQA process must be mitigated, to the extent feasible;

d) Various state (e.g., 1601) and federal (e.g., 404) permits must be obtained;

e) PCWA, or the entity with whom PCWA exchanges the water, must obtain approval for a new point of diversion off the Sacramento River; and

f) Property rights for the project must be obtained, construction must be advertised and contracted, and financing must be obtained for the project.

PCWA currently holds two primary water entitlements that could be utilized to serve this project: (1) a CVP contract with the USBR for up to 117,000 AFA; and (2) water rights through the construction of its MFP of up to 120,000 AFA. Each of these entitlements has, as part of their contractual agreements, conditions associated with delivery availability, place of use restrictions, and point of diversion authorizations. For the proposed project to utilize either of these entitlement sources, considerations as to their specific conditions of delivery must be assessed within any alternative contemplating these supplies.

Subalternative 1A - Sacramento River Diversion - PCWA Water Service Contract CVP Supply

As identified, PCWA holds a water service (CVP) contract with the USBR for up to 117,000 AFA. There is, however, some disagreement between PCWA and USBR as to whether the USBR has an obligation to deliver more than 35,000 AFA of CVP water to PCWA in the absence of Auburn Dam. PCWA is currently negotiating an amendatory contract with USBR, which would entitle it to 35,000 AFA (out of its original contract for up to 117,000 AFA). The amendatory contract would also authorize an additional point of diversion from the Sacramento River.
The amended contract, however, cannot be executed until NEPA and Endangered Species Act (ESA) compliance have been fulfilled. Moreover, it is unlikely that the contract will progress significantly ahead of the CVP-wide long-term contract renewals currently under negotiation. An executed amendatory contract would provide PCWA with the option of diverting its CVP water service contract supply from the Sacramento River, subject to any conditions determined through the environmental and permitting processes.

From a facilities and infrastructure perspective, a Sacramento River diversion would require significant regulatory and administrative approvals. Facilities siting, engineering design, approvals, and construction of a new intake structure, water treatment facility, and pumping/conveyance facilities would represent significant undertakings and would likely not be fully implemented for several years.

In addition to PCWA’s interest in the Sacramento River, several other local interests including the Natomas Central Mutual Water Company, City of Sacramento, Northridge Water District, and others have expressed an interest in partnering in a new diversion off the Sacramento River. In fact, Natomas Mutual Water Company is currently proceeding with its consolidation of the existing diversions off the Sacramento River to one or two new diversions. The project, known as the American Basin Fish Screen and Habitat Improvement Project, is intended to evaluate the existing non-screened diversions and consolidate the existing diversions at any one of three potential diversion sites (i.e., Sankey Diversion, Prichard Lake Diversion, or a Combined Sankey and Elkhorn Diversion).

**SubAlternative 1B - Sacramento River Diversion - PCWA Water Rights Supply**

Under this subalternative, the proposed project would obtain water from PCWA through a Sacramento River diversion, under PCWA’s MFP water rights. This diversion alternative, which relies on PCWA’s MFP entitlement, would require approval from USBR in order for PCWA to divert from the Sacramento River upstream from the American River confluence.

From a facilities and infrastructure perspective, this subalternative would encounter similar issues and concerns as Subalternative 1A. New facilities would be required, none of which are currently in place.

**Alternative 2 - North Fork American River Diversion - PCWA Middle Fork Project Supply**

Under this alternative, the proposed project would receive its water supply from PCWA through a diversion of MFP water at the Auburn pump station on the North Fork of the American River. Through an expanded PCWA delivery infrastructure, water could be conveyed to the project area. Precise conveyance to the project area, however, may take several routes depending on the delivery arrangements made with PCWA and perhaps others, such as the City of Roseville and/or the City of Lincoln. For example, part of the conveyance may be facilitated through a sharing of excess capacity within the City of Roseville delivery system. This alternative would assume that the proposed project be annexed into PCWA’s Zone 1 Water System Area.

PCWA has an existing agreement with the USBR, which requires the provision of facilities (by the United States) to enable PCWA to pump up to 50 cfs from the MFP at the Auburn site. To
date, the USBR has provided such a pumping facility on a seasonal basis only. PCWA and
USBR have diligently been pursuing the installation of year-round, flood-proof pumps of greater
capacity. However, PCWA’s currently planned pumping project (an increase to 100 cfs) will not
be capable of accommodating all of the planned growth through 2030. In the long-term, water
service to Placer County designated urban areas south of Baseline Road, and other areas of lower
elevation in Zone No. 1, are planned to be served from a diversion from the Sacramento River.

To be consistent with its commitments under the Water Forum Agreement, PCWA first would
have to determine that it was not feasible to implement a Sacramento River Diversion to serve
this project, before increasing its American River diversions above 35,500 AF. Alternatively,
PCWA could serve initial phases of this project from within the 35,500 AF Water Forum
limitation on PCWA’s American River diversions and remain consistent with its Water Forum
commitment. However, this supply is insufficient for Placer Vineyard’s demand at full buildout
because 35,500 AF represents only about half of the projected need (from Placer Vineyards and
other projects) through 2030.

Alternative 3 - Folsom Reservoir Diversion

This alternative involves the direct diversion of a surface water supply from Folsom Reservoir at
Folsom Dam. The water supply entitlement exercised under this alternative could be either
PCWA’s MFP water rights or its CVP contract. The existing diversion infrastructure at Folsom
Dam, however, does not have sufficient capacity to convey the total anticipated surface water
supply needs for Placer Vineyards. A new urban water supply intake would have to be
constructed. From this new aperture, raw water first would be pumped to the Folsom Pumping
Plant, operated by USBR. From there, it would be pumped along the North Fork Pipeline either
to the Sydney N. Petersen WTP, owned and operated by the San Juan Water District, or be
conveyed to the City of Roseville’s newly expanding water treatment facility. Recent
discussions between Placer Vineyards, PCWA, Placer County, San Juan Water District,
Northridge Water District, and Citizens Utilities Company of California (CUCC) have identified
the potential for a possible multi-party agreement where, the San Juan Water District would
provide the necessary treatment and conveyance capacity for the project through its
infrastructure. Such a scenario would, however, require Northridge to first relinquish a portion
of their peak summer usage so that available capacity at the Sydney N. Peterson WTP could be
allocated to Placer Vineyards.

Following treatment at either location, water would need to be conveyed to the project site. If
treatment were to occur at the City of Roseville’s WTP, conveyance capacity may be available to
accommodate the project within the City’s existing infrastructure. Additional conveyance,
however, would still be required to deliver the treated water beyond the City’s corporate
boundary (i.e., Fiddyment Road) westward to the project area. Alternatively, if treatment were
to occur at the Sydney N. Petersen WTP, conveyance could be facilitated through a sharing of
capacity in the San Juan Cooperative Transmission Pipeline and Northridge Conveyance
Pipeline, where and when excess capacity is identified. A new conveyance pipeline would tie
into the stub at the terminus of the Northridge Conveyance Pipeline (at Walerga Road). If long-
term conveyance capacity is not available from the City of Roseville or the San Juan Water
District, new transmission lines through existing developed areas would be required.
To be consistent with its commitments under the Water Forum Agreement, PCWA first would have to determine that it was not feasible to implement a Sacramento River Diversion to serve this project, before increasing its American River diversions above 35,500 AF. Alternatively, PCWA could serve this project from within the 35,500 AF Water Forum limitation on PCWA’s American River diversions and remain consistent with its Water Forum commitment; however, the other demands on this water may make this supply insufficient for Placer Vineyard’s demand at full buildout.

**Alternative 4 - Lower American River Diversion**

This alternative would involve the direct diversion of a PCWA surface water supply from the lower American River. Regardless of entitlement type (i.e., PCWA CVP water service contract water, or MFP water rights water), a diversion from the lower American River would most likely occur at the site of the City of Sacramento’s existing water diversion intake and treatment plant near Howe Avenue. PCWA would have to obtain a new point of diversion for its water rights or a new point of delivery under its CVP contract to implement this alternative. The E.A. Fairbairn (Fairbairn) WTP along the lower American River is currently owned and operated by the City of Sacramento and is planned to undergo both a replacement of all its intake screens (for fisheries protection purposes) as well as an expansion of its treatment plant facilities.

Under this alternative, diversion and treatment would be facilitated by the City of Sacramento through some presumed capacity sharing agreement with PCWA. Once treated, however, significant new conveyance pipelines would be necessary in order to deliver it to the proposed service area of the project. While existing conveyance is present north from the Fairbairn WTP (across the lower American River), capacity availability within the conveyance infrastructure is uncertain.

**Alternative 5 - Groundwater Pumping**

This alternative involves the direct acquisition of a raw water supply by pumping from the available aquifer to fully meet the project’s water supply needs. Under this alternative, it is assumed that a series of new groundwater wells would be constructed to provide the necessary raw water supply for the project. Wellhead treatment would likely be installed, providing the necessary treatment capabilities for those wells exhibiting water quality problems. Associated infrastructure (i.e., conveyance pipelines and booster pump stations, as necessary) also would be required to implement this alternative. At this time, the number of groundwater wells (and well fields) is uncertain, as is their placement within the project service area or outlying vicinity. Detailed hydrogeologic investigations, including groundwater modeling analyses, would need to be conducted to determine aquifer specific yield that would not involve detrimental impacts to long-term groundwater levels.

**Alternative 6 - Off-stream Storage**

This alternative would involve the development of an off-stream storage facility (e.g., reservoir) at a location within reasonable proximity to the project site. A surface water supply from Folsom Reservoir, the lower American River, or other sources would be stored in the facility during times of excess and relied upon during times of deficiency. Seasonally, such a storage facility could provide the opportunity to reduce direct surface water diversions during the
summer (i.e., high peak usage) months without any exacerbation of the underlying groundwater aquifer.

Development of an off-stream storage facility capable of meeting the annual water needs of the project would represent a significant undertaking. Facility siting, engineering design, environmental and regulatory review, and facility construction would be required.

Alternative 7 - No-Project

The No-Project Alternative is intended to describe the action(s) that the lead agency would take absent the proposed project. Under the No-Project Alternative, Placer County (the lead agency) would not approve the Placer Vineyards Specific Plan. Development could not occur without an approved specific plan; hence, water supply alternatives or options would not be needed.

PROPOSED INTERIM WATER SUPPLY ALTERNATIVES

Proposed Interim Water Supply - MFP Supply Conveyed through San Juan/Northridge Infrastructure (Full Surface Water)

Recently, several parties including Placer Vineyards, PCWA, Placer County, San Juan Water District, Northridge Water District, and Citizens Utilities Company of California (CUCC) have discussed the potential for a multi-party agreement where, treatment and conveyance capacity for San Juan Water District's WTP and the San Juan/Northridge cooperative transmission pipeline could be shared with Placer Vineyards. San Juan's water treatment plant currently has capacity in excess of the collective demands of their retail service area and wholesale customers within the District. San Juan and Northridge currently are under agreement to assign Northridge first priority to any surplus treatment capacity at the Sydney N. Peterson WTP. Northridge is currently using that surplus capacity to treat and deliver water it purchases from PCWA to meet its groundwater stabilization goals. A reduction in Northridge's use of capacity requirement could make a corresponding capacity allocation available to Placer Vineyards. According to San Juan, a reduction in Northridge's summer peak usage in treatment capacity for example, could free up additional capacity at the Sydney N. Peterson WTP; available for use by Placer Vineyards. This available capacity would be sufficient to meet the immediate needs of the proposed project."

While it is recognized that under this alternative, the San Juan/Northridge cooperative transmission pipeline would provide the necessary delivery conveyance westward from the Sydney N. Peterson WTP, CUCC represents the identified water retailer for the Placer Vineyards project area. Accordingly, CUCC would be the retail water provider for the proposed project. At this time, CUCC has expressed interest in participating in this potential multi-party agreement.

Under such an agreement, various potential water supply configurations would be possible. At this time, it is acknowledged that PCWA would provide the water supply within the provisions set forth in its purveyor-specific agreement with the Sacramento Area Water Forum.

Similar with other water supply alternatives previously described, this proposed interim water supply option would still require a new conveyance pipeline that ties into the stub at the terminus
of the existing Northridge Conveyance Pipeline (at Walerga Road). The full potential implementation of this interim water supply alternative will depend on the willingness of all participating interests to deliberately move forward to develop and execute the necessary multi-party agreement. Key issues of any such agreement would be related to the identification of a committed water supply source, role of CUCC, and funding structure for the new conveyance pipeline.

Interim Alternative A – Pipeline Improvements from Foothill WTP (Full Surface Water)

PCWA’s MFP water would be diverted from the American River at the Auburn pump station. The Foothill Water Treatment Plant (WTP) is undergoing a 27 million gallon per day (mgd) expansion to 55 mgd. When complete, this WTP would be able to physically accommodate treatment of PCWA’s 35,500 AF American River supply from the Auburn pump station. However, this source of supply would become unavailable as Zone 1 demands for Foothill WTP supplies increase, because PCWA has given the higher-elevation Zone 1 area priority for service from the Foothill WTP over lower-elevation areas (which includes Placer Vineyards). In the interim, however, water would be conveyed from the Foothill WTP via transmission facilities that would be improved to eliminate capacity restrictions, or, if necessary, via new transmission facilities. New facilities, if necessary, would likely be installed parallel to existing transmission facilities. New or improved facilities, while redundant in their long-term utility, would have sufficient interim capacity to deliver surface water to the Placer Vineyards project during peak periods; therefore, this interim alternative would not require supplemental groundwater use.

Conjunctive Use of Surface and Groundwater

Interim Alternative B relies upon the planned conjunctive use of groundwater and surface water from MFP diversions, or groundwater exclusively. Under this interim alternative, the delivery of the surface water supply would be limited by existing infrastructure capacity and, therefore, groundwater would be needed during this interim period to augment surface water deliveries during peak seasonal demand. Groundwater, in these limited quantities, would be relied upon for the first few years while the long-term surface water delivery system is being developed. Interim groundwater use, including peak seasonal use, would be discontinued after development of a long-term surface water supply, except as an emergency supply source.

This interim water supply alternative assumes an annual groundwater recharge component so that there would be no net annual drain on the groundwater basin. The groundwater wells constructed to supplement surface water deliveries would ultimately become part of the emergency supply, used to supplement surface water deliveries in the event that the temporarily-reduced demand under a severe drought still exceeds drought-curtailed surface water supplies. Wellhead treatment and associated infrastructure (e.g., storage tanks and booster pump stations) also would be installed as necessary. At this time, the number of groundwater wells (and well fields) is uncertain, as is their placement within the project service area or outlying vicinity. Detailed hydrogeologic investigations, including analysis through groundwater modeling, will be conducted to determine aquifer specific yield that will not involve detrimental impacts to long-term groundwater levels. Short-term impacts to other historic well-dependent users will also be investigated.
Interim Alternative B - Foothill Water Supply – Conjunctive Use

PCWA’s MFP water would be diverted from the American River at the Auburn pump station and treated at the Foothill WTP, and would be unavailable in the long-term. Unlike Interim Alternative A, water would be conveyed from the Foothill WTP via existing and proposed transmission facilities, which would have limited or no excess capacity to deliver surface water to the Placer Vineyards project during peak periods. Therefore, this alternative would require groundwater to supplement surface water deliveries during peak summer periods.

Interim Alternative C - Full Groundwater

This interim water supply alternative differs from all the previous water supply options in that it would rely wholly upon groundwater until completion of a long-term water supply alternative (e.g., Sacramento River diversion). Groundwater use under this interim alternative would be discontinued thereafter, except as an emergency supply source. Groundwater use would not be recharged. Wellhead treatment and associated infrastructure also would be installed as necessary. At this time, the number of groundwater wells (and well fields) is uncertain, as is their placement within the project service area or outlying vicinity.

PRELIMINARY ALTERNATIVES SCREENING PROCESS

The following discussion describes the results of the screening process where each alternative (and subalternative, as necessary) is evaluated according to the screening criteria.

LONG-TERM WATER SUPPLY ALTERNATIVES

Subalternative 1A - Sacramento River Diversion - PCWA CVP Supply

At the present time, no infrastructure exists to convey water from the Sacramento River to the Placer Vineyards Specific Plan area. A Sacramento River diversion would require a new river intake structure, treatment facility, and appropriate pipeline conveyance (including booster pump stations) to cover the approximate 7 miles from the river to the project service area. Although interest and support for a new Sacramento River diversion has been expressed in the Water Forum and recent American Basin Fish Screens and Habitat Improvement Project, such facilities would not likely be fully constructed for some time. Significant effort regarding facilities siting, engineering design, environmental review, permitting, and approval would be required. Moreover, a diversion and treatment project of this magnitude and scale would require the support and commitment of a project proponent, either independently, or through some collaborative arrangement with willing third-party partners. A substantial funding commitment would need to be identified and established. At the present time, however, no such commitment has been finalized.

This subalternative would also be contingent upon a fully executed amended contract between PCWA and USBR, which is intended to provide the contractual authority for PCWA to change its authorized point of diversion for its CVP water service contract. As discussed previously, it is unlikely that, from a timing perspective, this amended contract will progress significantly ahead of the CVP-wide long-term contract renewals currently under negotiation.
From a reliability perspective, this subalternative would rely on the same "firmness" as with any similar CVP water service contract. It would be subject to the same level of deficiencies imposed by the USBR on all other CVP water service contractors based on contract and water year type.

Despite the potential constraints facing this alternative, the potential beneficial attributes from a reservoir and river protection perspective make this subalternative worthy of consideration. The further downstream PCWA water can be diverted, relative to the Auburn pumps, the more tangible the benefit to resources of Folsom Reservoir and the lower American River. A diversion from the Sacramento River essentially eliminates potential adverse effects to resources of Folsom Reservoir or the lower American River. With the potential to achieve such genuine environmental benefits to the lower American River, this subalternative would meet the intent of CEQA concerning the selection of feasible and reasonable alternatives. Accordingly, this alternative will be carried forward as a separate alternative in the EIR.

Subalternative 1B - Sacramento River Diversion - PCWA Water Rights Supply

This subalternative is similar to Subalternative 1A, except that the water supply source would be PCWA’s MFP water facilitated through an exchange on the Sacramento River. Under this alternative, the point of diversion would be upstream of the American River confluence and an exchange with Sacramento River water would need to occur. From an institutional perspective, this would require USBR approval. USBR interests would be associated with the proposed pattern of releases from the MFP, since MFP releases, as part of Folsom Reservoir inflow, would become part of Folsom Reservoir storage and could affect USBR reservoir and lower American River operations, and their obligations to maintain Delta water quality. It is anticipated that SWRCB interests would generally focus on the maintenance of Delta water quality. No change in authorized place of use would be required through the SWRCB.

From an infrastructural perspective, the same diversion intake, treatment, and pipeline conveyance systems would be required as Subalternative 1A. Long-term reliability would ostensibly be higher, relative to Subalternative 1A, since PCWA’s MFP water would not be subject to USBR imposed deficiencies during dry years.

Similar with Subalternative 1A, a diversion from the Sacramento River essentially eliminates potential adverse effects to resources of Folsom Reservoir or the lower American River. As such, this subalternative would meet the intent of CEQA concerning the selection of feasible and reasonable alternatives from a beneficial environmental perspective. Accordingly, this alternative will be carried forward as a separate alternative in the EIR.

Alternative 2 - North Fork American River Diversion - PCWA Middle Fork Project Supply

This alternative passes all of the screening criteria, with the possible exception of the Institutional Criterion. Depending on actual buildout water demands and the specific allocations by PCWA of its MFP water supplies to its customers, a long-term committed supply may, or may not, be available to the project from this source and location. Given the past and expected continued efforts to permanently implement the PCWA pumps and PCWA’s planned initiatives at improving its water system area delivery capabilities, however, this water supply alternative
does not appear unduly speculative at this time. Accordingly, this alternative will be carried forward as a separate alternative in the EIR.

**Alternative 3 - Folsom Reservoir Diversion**

A diversion of PCWA water from Folsom Reservoir at Folsom Dam would require new facility infrastructure at the diversion location. Diversions would be pumped to either the Sydney N. Petersen WTP or the City of Roseville WTP. Institutionally, shared treatment and delivery capacity agreements would be required either with the San Juan Water District or City of Roseville. Moreover, a long-term Warren Act contract also would be required from USBR in order to use the Folsom Dam facilities since any “wheeling” of non-CVP water through federal facilities requires such an agreement. None of these institutional requirements, however, would be untenable.

From an infrastructural perspective, additional delivery conveyance also would be required to deliver the treated water to the project service area. Regardless of whether delivery is via the San Juan Cooperative Transmission Pipeline/Northridge Conveyance Pipeline, or through the City of Roseville’s existing delivery infrastructure, additional pipelines (approximately 2 miles) would be required. Technical and physical constraints and the economic costs associated with the need for new facilities (i.e., intake structure and pipelines), would be considerable, but feasible.

This alternative passes all of the screening criteria. Accordingly, this alternative will be carried forward as a separate alternative in the EIR.

**Alternative 4 - Lower American River Diversion**

A diversion from the lower American River, presumably at the location of the City of Sacramento’s Fairbairn WTP near the Howe Avenue Bridge, would not require new in-river infrastructure or treatment facilities. This alternative would rely on the City’s existing facilities and water supply would be provided by PCWA through MFP releases. Thus, both the Technical and Physical Criterion and Reliability Criterion would appear to be satisfied.

This diversion alternative would, however, require PCWA to apply for a new point of diversion on the American River. PCWA and the City also would need to enter into an agreement regarding shared capacity of the E.A. Fairbairn WTP. However, the availability of long-term excess capacity is speculative and not reliable. PCWA also would need to enter into agreements with the water districts located between the City of Sacramento and Placer Vineyards to use available capacities in their respective conveyances from the river towards the project area. Such agreements are not necessarily complex; however, there is no existing framework for implementing this alternative. In addition, diversion of PCWA MFP water from the lower American River was not contemplated in the Water Forum Agreement. Thus, in addition to reliability concerns, several institutional or legal hurdles are present with this alternative.

As with the other alternatives, new conveyance pipelines to the project service area would be required to deliver treated water to the project service area. Construction-related activities and costs would not, however, make this alternative impractical.
From an environmental perspective, this point of diversion would be superior to upstream American River diversions, but inferior to a Sacramento River diversion. The further downstream PCWA water can be diverted, the more tangible the benefit to Folsom Reservoir and the lower American River.

Because of the apparent reliability, institutional and legal hurdles, and environmental considerations, this alternative will not be carried forward as a separate alternative in the EIR.

**Alternative 5 - Groundwater Pumping**

The groundwater aquifer underlying much of northern Sacramento County and southwestern Placer County has experienced significant declines over the years. The cone of depression in this area, centered beneath McClellan Air Force Base, is approximately 60 feet below sea level. The declining groundwater levels in this area have been under investigation for some time and have resulted in several recent initiatives to determine how best to alleviate the area’s current groundwater overdraft. The groundwater levels along the Placer/Sacramento county line west of the City of Roseville continue to decline at a rate of about 1.5 feet per year. It is generally recognized through such efforts as the Water Forum and Sacramento North Area Groundwater Management Authority that some curtailment of both current and future demands on this aquifer are required in order to avoid further depletion. Such efforts would, in the long-term, avoid the related adverse impacts associated with a lowered water table such as the risks of land subsidence, increased groundwater pumping (and wellhead treatment) costs, and the ultimate risk of some existing wells going dry.

From an institutional and legal perspective, it is acknowledged that any approval of new developments must be conditioned on the long-term availability of a surface water supply. Groundwater use, as the sole long-term water supply for approved and planned development, is not supported by current Placer County policy.

This alternative would fail the Groundwater Depletion Criterion, Institutional and Legal Criteria, and likely the Environmental Criterion. Accordingly, this alternative will not be carried forward as a separate alternative in the EIR.

**Alternative 6 - Off-stream Storage**

Reliance upon available or newly developed storage off-stream would represent a significant undertaking. No off-stream storage projects have been proposed for the general areas surrounding Folsom Reservoir, the lower American River, or within the greater Sacramento area. Such facilities would require significant environmental evaluation and review, intense political lobbying, significant funding, and a *bona fide* ownership (or lead agency) interest. No such interested party has come forward. This alternative would be inconsistent with the Institutional and Legal Criteria, Timing Criterion, and likely, the Environmental Criterion. Such a project or facility is too speculative to be considered reasonable and feasible at this time and, therefore, will not be carried forward as a separate alternative in the EIR.
Alternative 7 - No-Project

Under the No-Project alternative, the project would not proceed and, therefore, there would be no additional water demand or, the need for any ancillary facilities associated with a water diversion, treatment component, or delivery conveyance. As required under CEQA, however, the No-Project alternative must be carried forward and included in any evaluation of alternatives. Accordingly, this alternative will be carried forward as a separate alternative in the EIR.

INTERIM WATER SUPPLY ALTERNATIVES

The Proposed Interim Water Supply, and two of the interim water supply alternatives rely on PCWA’s MFP supply, which may not be fully available in the long-term. The remaining interim water supply alternative relies fully on groundwater, which conflicts with Placer County’s groundwater policy. Therefore, the Proposed Interim Water Supply and interim water supply alternatives are not viable as long-term solutions. The interim alternatives may only be implemented with the certainty that long-term water supply alternatives can and will be implemented within a reasonable time frame.

Proposed Interim Water Supply - MFP Supply Conveyed through San Juan/Northridge Pipeline

With regard to Institutional and Legal Criteria, use of PCWA’s MFP supply on an interim basis, and treatment at the San Juan Water District WTP, would not be unduly speculative, nor would negotiating a Warren Act contract with USBR. With regard to the Timing Criterion, although PCWA’s MFP supply may not be fully available in the long-term, it would be available for the interim period when it is needed. The Proposed Interim Water Supply also meets the Economic and Public Health Criteria. Therefore, it will be carried forward as the proposed interim water supply in the EIR.

Interim Alternative A (Pipeline Improvements from Foothill WTP - Full Surface Water) and Interim Alternative B (Foothill Water Supply - Conjunctive Use)

Both Interim Alternative A (Pipeline Improvements from Foothill WTP - Full Surface Water) and Interim Alternative B (Foothill Water Supply - Conjunctive Use) rely on a surface water supply that would be made available from PCWA’s MFP, thus satisfactorily meeting the Reliability Criterion. As with the Proposed Interim Water Supply discussed above, although PCWA’s MFP supply may not be fully available in the long-term, it would be available for the interim period when it is needed. With regard to Institutional and Legal Criteria, use of PCWA’s MFP supply on an interim basis, and treatment at the Foothill WTP, would not be unduly speculative. Interim Alternative A does not rely on any groundwater use and, therefore, would not compromise the Groundwater Depletion Criteria, nor existing County policy regarding the same. Under Interim Alternative B, groundwater use would be seasonal and temporary, with active efforts to recharge the aquifer so that no net depletion would occur from a basin-wide perspective, consistent with the Groundwater Depletion Criteria. Both of these alternatives also meet the Economic and Public Health Criteria. Therefore, these interim alternatives will be carried forward as interim water supply alternatives in the EIR.
Interim Alternative C - Full Groundwater

This interim water supply alternative would rely fully upon groundwater supplies, and would result in some depletion of the groundwater aquifer. This water supply alternative would meet the reliability, economic and public health criteria. With regard to Institutional and Legal Criteria, however, this alternative conflicts with the County's current policy regarding groundwater use. This inconsistency with County policy represents a significant institutional obstacle that will need to be addressed to implement this alternative. While recognizing the institutional uncertainty and significance of this potential interim water supply alternative, for the purposes of the EIR analyses, this alternative will be carried forward as an interim water supply alternative in the EIR. It represents the only interim alternative that would not rely on any existing surface water supply (e.g., MFP water), treatment or delivery infrastructure and, therefore, represents a significant savings of time and cost, as well as potential environmental benefits associated with non-utilization of surface water.

ADDITIONAL DEMAND REDUCTION CONSIDERATIONS

Short-term and long-term water conservation, or demand reduction measures, have already been incorporated into the water demand projections for the project. Accordingly, water conservation is a component of the Proposed Interim Water Supply and the interim and long-term water supply alternatives in the EIR.

The potential use of reclaimed wastewater by the proposed project would reduce the overall water demands of the project because it could be used to offset intended deliveries for such purposes as landscape irrigation and various industrial uses. Current regulations prohibit the use of reclaimed water as a direct source of potable water. Because wastewater reclamation would reduce surface water demand, it will be a component of the Proposed Interim Water Supply and the interim and long-term water supply alternatives in the EIR.

SUMMARY OF ALTERNATIVES SCREENING AND ALTERNATIVES TO BE CARRIED FORWARD FOR EIR ANALYSES

The Proposed Interim Water Supply and the following interim and long-term water supply alternatives will be carried forward for further, detailed analysis in the EIR.

- Interim Alternative A – Pipeline Improvements from Foothill WTP (Full Surface Water)
- Interim Alternative B – Foothill Water Supply (Conjunctive Use)
- Interim Alternative C – Full Groundwater
- Subalternative 1A – Sacramento River Diversion – PCWA CVP Supply
- Subalternative 1B – Sacramento River Diversion – PCWA Water Rights MFP Supply
- Alternative 2 – North Fork American River Diversion – PCWA MFP Supply
- Alternative 3 – Folsom Reservoir Diversion
- Alternative 7 – No-Project

The rationale for carrying these alternatives forward for analysis in the EIR is summarized below.
INTERIM WATER SUPPLY ALTERNATIVES

The Proposed Interim Water Supply, based on recent discussions and interest as expressed among PCWA, San Juan Water District, Northridge Water District, and CUCC, represents a reasonable and feasible option to securing a short-term water supply for the project. Similarly, both the full surface water (Interim Alternative A) and conjunctive use interim surface water supply (Interim Alternative B) alternatives being carried forward also appear to represent reasonable and feasible options for the project to acquire a short-term water supply. The planned groundwater use and recharge in the context of a conjunctive use program satisfies the Groundwater Depletion Criterion, although it does not satisfy Placer County’s groundwater policy. These two interim alternatives rely on PCWA’s water rights for their surface water supply. The groundwater use only interim alternative is carried forward because of its economic, and timing benefits.

LONG-TERM WATER SUPPLY ALTERNATIVES

The screening process identified above eliminated several alternatives from further consideration in the subsequent EIR environmental review. With the exception of the lower American River diversion, all of the surface water diversion alternatives are to be carried forward for detailed analysis in the EIR. The surface water diversion alternatives, by virtue of their reliance on PCWA water rights, and ability to satisfactorily meet the screening criteria consistent with the intent of CEQA, represent sound water supply options. At this time, these alternatives appear to represent reasonable and feasible options for the project to acquire a long-term water supply.

It is recognized that each surface water alternative will require delivery infrastructure (i.e., conveyance pipelines) to carry water specifically to the project service area. This common requirement should not be perceived as an obstacle to consideration of any alternative.

Groundwater pumping is not being carried forward as a separate long-term alternative because of Placer County's policy requiring surface water use. Off-stream storage also is eliminated from further consideration on the basis of its institutional and political uncertainty, potential adverse environmental effects, and highly speculative nature at this time.
Figure 3 Land Use Plan

Land Use Diagram

PLACER VINEYARDS
Placer County, California

Legend

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Note: For conceptual planning purposes only. Actual dimensions, acreages and fields will vary with more accurate final mapping.

April 6, 1999
1 June 2001

Lori Lawrence  
Placer County Planning Dept  
11414 “B” Avenue  
Auburn, CA 95603

Subject: Supplemental Notice of Preparation of a Draft Environmental Impact Report for Placer Vineyards Specific Plan, Focusing on Interim and Long-Term Water Supply (SCH #1999062020)

Dear Ms. Lawrence,

This is to notify the Planning Department of my objection to Interim Alternative B-Foothill Water Supply (Conjunctive Use) for the following reasons.

In the Placer County General Plan (August 1994) under Water Supply and Delivery, Goal 4.C. and all of its respective Policies (policies 4.C.1. - 4.C.13) does not allow for the use of ground water, conjunctive, interim, or otherwise, for the implementation of new projects the density of which are similar to Placer Vineyards. There is no mention or allowance for the interim use of groundwater. The use of groundwater is allowed only in rural and agricultural areas (policy 4.C.2).

Policy 4.C.12. limits the growth rate of areas using ground water (for rural and agriculture - if one adheres to policy 4.C.2) as well as those using surface water.


If funding is not sufficient to install the required long-term surface water infrastructure, could this situation not be used as a phasing mechanism? What guarantees that funds will be made available to install the needed infrastructure more than that of predating development of the region on installation of the required surface water infrastructure?

Based on the foregoing and for the protection of current groundwater users in the project area, I respectfully request that any use of groundwater for the implementation of development projects such as Placer Vineyards not be considered.

Respectfully

[Signature]

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

SUBJECT: NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT FOR PLACER VINEYARDS SPECIFIC PLAN (STATE CLEARINGHOUSE NO. 1999062020)

Dear Ms. Lawrence:

The Department of Transportation has reviewed the Notice of Preparation of an Environmental Impact Report for the Placer Vineyards Specific Plan. We have no specific comments at this time.

If you have any questions please call me at 874-5966.

Sincerely,

Jeffrey E. Clark, Manager  
Transportation Planning Section

JEC:ar

cc. Kyle Hines
June 15, 2001

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

Subject: NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT FOR PLACER VINEYARDS SPECIFIC PLAN (STATE CLEARINGHOUSE NO. 1999062020)

Dear Ms. Lawrence:

In response to your request for comments regarding the above-cited project, I have attached comments from the following Public Works agencies:

1. Department of Transportation - Please refer to the enclosed letter from Jeffrey E. Clark, Manager of Transportation Planning Section, dated June 5, 2001.

If you have any questions regarding this response, please call Steve Hong of the Department of County Engineering/Administration at 874-6525.

Sincerely,

[Signature]
Warren H. Harada
Agency Administrator

WHH:SLH:slh/2001-26
Attachment
cc: Robert Shanks
Keith DeVore
Tom Zlotkowski
Steve Pedretti
Maureen Zamarripa
Dan Shoeman
Wendell Kido
June 18, 2001

Placer County Planning Department
11414 “B” Avenue
Auburn, CA 95603
Attention: Lori Lawrence

SUBJECT: SUPPLEMENTAL NOP FOR DRAFT EIR FOR PLACER VINEYARDS SPECIFIC PLAN (SCH #1999062020)

Ms. Lawrence:

I understand that the Supplemental Notice is focusing on Interim and Long-term water supply issues. I do not have any comments about this project as it relates to water supply issues. I do have comments as it relates to drainage issues and how it can affect downstream properties and downstream infrastructure.

SAFCA along with the City of Sacramento and the County of Sacramento are interested in reviewing and commenting on any notices regarding drainage issues concerning the Specific Plan. There are two issues that are of concern. First, there have been discussions with the Placer County Flood Control Agency about the need for a off-line detention basin upstream of the Sacramento County line within the Placer Vineyards Specific Plan to help reduce flood flows in Dry Creek.

The second issue concerns runoff from the Specific Plan that drains to Steelhead Creek (formerly known as Natomas East Main Drainage Canal). SAFCA has constructed a pump station where Steelhead Creek and Dry Creek come together. If the Placer Vineyards development changes drainage characteristics in the watershed, they will need to take measures so as not to affect the flood regime downstream.

Please notify me of any further chances to comment on the Specific Plan as it relates to drainage. If you have any questions, please feel free to contact me at (916) 874-8733.

Sincerely,

Pete Ghelichi
Director of Engineering
Cc: Dave Brent, City of Sacramento
    George Booth, County of Sacramento
    Leslie Gault, Placer County Flood Control Agency
MEMORANDUM
DEPARTMENT OF PUBLIC WORKS
County of Placer

TO: LORI LAWRENCE, PLANNING DEPARTMENT
FROM: PHILLIP A. FRANTZ, LAND DEVELOPMENT, DPW
DATE: 6/18/01

SUBJECT: SUPPLEMENTAL NOTICE OF PREPARATION: PLACER VINEYARDS
SPECIFIC PLAN; WATER SUPPLY

The revised NOP includes changes to the proposed project relating to water supply. We have completed our review of the information submitted and have the following comments on the Supplemental Notice of Preparation:

1. The NOP references the infrastructure required to construct the various water supply conveyance alternatives. The EIR should address all impacts related to the construction of all improvements required to convey water to the proposed project (i.e.: grading, erosion, drainage impacts, etc. from the construction of intake structures, treatment facilities, pipelines, etc.).

Ref.: placer vineyards supplemental nop.doc
Leslie Gault (Public Works) and Fred Yeager (Planning)
Placer County
11444 B- Avenue
Auburn, CA  95603
Fax to: (530) 885-3159 and (530)889-7499

Subject: Placer Vineyards Specific Plan (PVSP)

Dear Leslie and Fred,

The subject development proposed for South Placer County at the Sacramento County line drains, as you know, to two watercourses, both of which experience flood concerns. This letter describes the constraints to increasing flows due to the development, and some pertinent modeling information.

Dry Creek
The eastern-most portion of the PVSP drains to Dry Creek. As you know, we developed, and provided to you, a database of existing structures with finish-floor elevations along Dry Creek (both branches). Many homes in this area are currently at flood risk well below the 100-year event, some near 10-year. The constraint to increasing flows along this reach is clearly that the existing level of protection for homes must not be reduced. As discussed previously, we are interested in working with your agency to find ways to relieve the flooding situation along Dry Creek, including exploring the potential of a detention basin in Placer County between Watt Avenue and Walerga Road, which is within the PVSP boundaries. It would seem an opportune time to acquire a detention site that meets PVSP mitigation requirements, as well as providing additional protection for upstream development.

The FEMA 100-year floodplain is currently in the process of being remapped for Dry Creek in Sacramento County. The hydrology (HEC-1) models were based on the 1992 Dry Creek Watershed Flood Control Plan developed jointly by our agencies and the City of Roseville. The hydraulics was based on a 2-dimensional model, FESWMS, used because of the complexities of flow between the two branches. Only the 100-year event was modeled. Analysis of other frequencies will be required for the PVSP, but FESWMS would be impractical for those more-frequent events. It may be that a simple multi-frequency hydrologic analysis using HEC-1 is sufficient to demonstrate that no increase in flood risk occurs to downstream residents (i.e., reducing post-project flows to existing levels for the 10- through 100-year events). However, we recommend that the actual design of the detention basin be made using UNET.
Natomas East Main Drainage Canal (NEMDC)

The remainder of the PVSP drains west (through Sutter County) to the Natomas East Main Drainage Canal. A few years ago SAFCA built a levee and pump station (D15) along the north side of Dry Creek (to stop backwater from the American River) that gravity drains during times of low flows, but requires pumping when downstream stages are high. The pumps were sized to maintain a 100-year water surface elevation of 33 feet NGVD upstream of the pump station. The main constraint in this area is to ensure that the original design conditions for the D15 pumps are not compromised.

The drainage area to the D15 pump station includes the Natomas East Stream Group (which includes the westerly draining portion of the PVSP), and for information, a portion of the Pleasant Grove watershed that spills over Sankey Road. Hydrologic input for the pump design assumed ultimate land use in the Natomas East Stream Group with minimal channelization. SACFA’s consultant has hydrologic (HEC-1) and hydraulic (UNET) models for the area, which I am sure they will make available.

Please let me know if I can be assistance in scoping/reviewing the H&H analysis of the engineer for the PVSP.

Sincerely,

Pete Hall

Cc: George Booth
SAFCA/Pete Ghelfi, John Bassett

File: P:\Shared\Folders\DrainDev\Dry Creek\NEMDC (Zone 11C)\Specific-Comprehensive Plan\Placer\Vineyards Specific\Plan\Memo 6-18-01
Ms. Lori Lawrence  
Placer County Planning Department  
11414 “B” Avenue  
Auburn, CA 95603  

Subject: Comments on the Supplemental Notice of Preparation of a Draft Environmental Impact Report for Placer Vineyards Specific Plan (SCH #1999062020)  

Dear Ms. Lawrence:  

Thank you for circulating a supplemental Notice of Preparation (NOP) on this project and providing the opportunity to comment on it.  

The County of Sacramento Department of Water Resources has participated in the Water Forum process from its beginning and is a member of the Sacramento North Area Groundwater Management Authority (SNAGMA). It is also a member of the American River Basin Cooperating Agencies (ARBCA), which is developing a Regional Water Master Plan for southern part of the North American Groundwater Basin. Department staff also serve as staff to the Sacramento County Water Agency, which provides water to its service areas in the northern part of Sacramento County and depends on groundwater pumped from the basin. As party to all these activities, staff is concerned about protection of the water supplies and the users.  

The Placer County General Plan water supply policies outlined in the NOP are reasonable though somewhat limited and the alternative screening criteria described go beyond them to cover some important areas. However, it appears that a bridge to transition from dependence on interim water supplies to dependence on long-term supplies that insures against harm to groundwater basin, the American River surface water supplies, and the affected water users is needed. That is, if some level of development is contemplated to be approved based on interim water supplies, then interim water use or the level of development must be strictly limited until long-term water supplies are assured. The Draft Environmental Impact Report (DEIR) should set out a specific requirement that protects the water supplies and the users and include it as a condition on project approval. A more conservative approach would be to condition any level of development on a certain level of assurance on the delivery of long-term supplies.
Ms. Lori Lawrence  
June 18, 2001  
Page 2 of 2

On a more technical level, Subalternative 1B does not clearly describe how the Middle Fork Project water rights could be diverted or exchanged for diversion off the Sacramento. This might be a particularly complex undertaking that depends on the cooperation of other private and public agencies, including the State Water Resources Control Board. This process should be more fully described and evaluated in the DEIR.

The description of Interim Alternative B provided in the NOP says that this alternative assumes that annual groundwater recharge would occur. This description is unclear as to how surface water recharge would be implemented. This should be fully described and evaluated in the DEIR.

Thank you once again for the opportunity to comment. If you have any questions, please call me at 874-6482.

Sincerely,

[Signature]

Tad S. Berkebile  
Associate Civil Engineer

cc: Darrell Eck
June 18, 2001

Ms. Lori Lawrence, Planning Technician I
Placer County Planning Department
1141 “B” Avenue
Auburn, CA 95603

Re: Supplemental Notice of Preparation of a Draft EIR for Placer Vineyards Specific Plan

Dear Ms. Lawrence:

Thank you for contacting Citrus Heights Water District regarding the interim and long-term water supply for the Placer Vineyards Specific Plan.

With regards to the long-term water supply, the District’s water supply and transmission options are not tied to the Sacramento River. Therefore, Placer Vineyards’ long-term water supply from a proposed new diversion on the Sacramento River is not likely to be an issue for Citrus Heights Water District.

Conversely, the provision of an interim water supply from the American River through San Juan Water District’s treatment plant and connected water transmission facilities is of significant interest to Citrus Heights Water District.

Historically, the District has received more than 90% of its water supply via San Juan Water District. This surface water is treated by San Juan Water District and conveyed to the District through various water transmission facilities including the District’s own 42” transmission pipeline and the San Juan Cooperative Transmission Pipeline Project. The latter project, 72” to 78” in diameter, contains capacity entitlements for Northridge Water District, Citrus Heights Water District, Fair Oaks Water District, Orange Vale Water Company and San Juan Water District. The 48” Northridge Conveyance Pipeline connects to the westerly terminus of this project.

Citrus Heights Water District requests that the scope and content of the environmental information relating to the interim water supply for the project include the following items:

1. An analysis of the Placer Vineyards Specific Plan impacts on annual and seasonal water treatment availability at San Juan Water District for the current and future needs of the Citrus Heights Water District.

2. An analysis of the Placer Vineyards Specific Plan impacts upon annual and seasonal water conveyance through the San Juan Cooperative Transmission Pipeline Project.
Sincerely,

[Signature: Robert A. Churchill]

Robert A. Churchill
General Manager

cc: James R. English, San Juan Water District
    Dewight F. Kramer, Sr., Northridge Water District
    Robert S. Roscoe, Citizens Utilities Company of California
June 18, 2001

Placer County Planning Department
11414 “B” Avenue
Auburn, CA  95603
Attention: Lori Lawrence

SUBJECT:  SUPPLEMENTAL NOP FOR DRAFT EIR FOR PLACER VINEYARDS SPECIFIC PLAN  (SCH #1999062020)

Ms. Lawrence:

I understand that the Supplemental Notice is focusing on Interim and Long -term water supply issues. I do not have any comments about this project as it relates to water supply issues. I do have comments as it relates to drainage issues and how it can affect downstream properties and downstream infrastructure.

SAFCA along with the City of Sacramento and the County of Sacramento are interested in reviewing and commenting on any notices regarding drainage issues concerning the Specific Plan. There are two issues that are of concern. First, there have been discussions with the Placer County Flood Control Agency about the need for a off-line detention basin upstream of the Sacramento County line within the Placer Vineyards Specific Plan to help reduce flood flows in Dry Creek.

The second issue concerns runoff from the Specific Plan that drains to Steelhead Creek (formerly known as Natomas East Main Drainage Canal). SAFCA has constructed a pump station where Steelhead Creek and Dry Creek come together. If the Placer Vineyards development changes drainage characteristics in the watershed, they will need to take measures so as not to affect the flood regime downstream.

Please notify me of any further chances to comment on the Specific Plan as it relates to drainage. If you have any questions, please feel free to contact me at (916) 874-8733.

Sincerely,

Pete Ghelfi
Director of Engineering
Cc: Dave Brent, City of Sacramento
    George Booth, County of Sacramento
    Leslie Gault, Placer County Flood Control Agency
June 18, 2001

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

SUBJECT: NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT REPORT – PLACER VINEYARDS SPECIFIC PLAN

Dear Mr. Yeager:

Thank you for referring this NOP to the Sacramento Metropolitan Air Quality Management District (District) for review and comment. It is our understanding that this NOP is being considered in conjunction with a Supplemental NOP pertaining to long-term and short-term water supply for the project.

Sacramento County and the surrounding region, known as the Sacramento federal ozone non-attainment area (including western Placer County), have been designated by the Federal Environmental Protection Agency (EPA) as a “severe” non-attainment area for ozone. This classification is due to recurrent exceedances of the Federal Clean Air Act’s health based air quality standards.

The 1994 State Implementation Plan (SIP) for the federal non-attainment area requires that the area achieve “attainment” by 2005. In order to reach attainment by the prescribed date, the SIP states that emissions must be reduced from land use and transportation sources by one ton of reactive organic gases (ROG) per day, and one ton of oxides of nitrogen (NOx) per day. These pollutants are precursors to the formation of ozone.

In estimating the amount of emissions reductions to be included in our SIP commitment, the adopted General Plans of local agencies are used to estimate future population and employment. A change in either of these two parameters can then be used to estimate changes in emissions to the atmosphere. Land use changes contemplated by this Specific Plan, even over the projected 30 to 50 year time period, could result in emissions that are significantly greater than what was used to calculate the current emissions included in the SIP commitment.

It is important that the Draft EIR address emissions from all phases of a project (over the life of the project), including grading, construction, and operation. In addition, the Draft EIR should include an assessment of the cumulative impacts of emissions generated by each phase of the project, including the impacts of multiple developments on the public infrastructure such as
roads and highways. In order to accomplish these emission reductions, we recommend that the Specific Plan include a comprehensive list of both on-site and off-site mitigation strategies to be implemented as development occurs. There should also be provisions in the Specific Plan to amend these strategies over time to keep abreast with air quality changes over the "buildout" of this project.

Should you have any questions regarding these comments, please contact me at (916) 874-4885, or pstafford@airquality.org.

Sincerely,

Phil Stafford
Associate Air Pollution Planner

cc: Ron Maertz, Transportation & Land Use Program Coordinator - SMAQMD
    Karen Wilson - SMAQMD
    Jim Jester - SMAQMD
    Dave Vintze - Placer County APCD
    Jude Lamare, Ph.D. – Cleaner Air Partnership
Re: Placer Vineyard NOP for Water Supply (SCH #1999062020)
The following are some things I would like to see analyzed in the EIR for water supply to Placer Vineyards. The mix of alternatives certainly creates a House of Cards. Take out any one component of this Byzantine labyrinth of purveyor agreements, transmission routes and pipelines, existing, expanded, and envisioned treatment facilities, and required government approvals for changes and expansion of water rights amendments and places of use, and it all falls down. When it does, the current residents of the entire region will be left to pick up the pieces.
Please explain in the EIR who including existing ratepayers for the many special districts implicated in this shocking mix of alternatives will mitigate for unforeseen consequences of the following rocky conditions that are already identified, let alone those not yet identified:
Since Auburn Dam is absent, PCWA has an existing dispute with the USBR over whether it has 117,000 or 35,000 acre-feet of CVP water. This is a very big gap in water availability, and this matter should be fully resolved before full environmental analysis can begin. (Your NOP did note this dilemma.) Since PG&E is in bankruptcy, PCWA is not necessarily guaranteed to receive 100,400 acre-feet annually from PG&E after it imports water for power generation into Western Placer County from the Yuba and Bear Rivers. Since the bankruptcy court could change this scenario, this 100,400 AF seems unreliable. The expectation that the Sacramento River Diversion point will become fully operational begs the question of federal funding for the feasibility study and the habitat analysis and other environmental issues associated with the Sacramento River diversion.
How will the costs of electricity for such a massive amount of water pumping and wheeling be borne? Where will the power come from?
Will water planning for PCWA need to be more responsive to fire fighting in Zone 1 the future? Is there a formula to apply to bad fire years, comparable to dry water years? 2001 has been quite frightening so far. Whose groundwater outside the project service area would be use for Alternative 5-groundwater pumping?
Whose water rights would be used for Alternative 6, Off-stream storage?
With so many physical projects for water diversion, transmission, and treatment, please identify the cumulative impacts throughout the Sacramento/Placer county region of these facilities and their environmental impacts?
Thanks for adding these points to your analysis.
Vicki Lee, Mother Lode Chapter Chair, Sierra Club
1360 Perkins Way, Sacramento, CA 95818 916-447-3670 home; 657-3465 work
Vicki Lee, CalServe Analyst
Youth Education Partnerships Office
(916) 657-3465
June 18, 2001

Lori Lawrence, Planning Technician I
Placer County Planning Department
11414 “B” Avenue
Auburn, CA 95603

Subject: Placer Vineyards Specific Plan

Dear Ms Lawrence:

Please add the Water Forum to your Interested Parties list regarding the subject Specific Plan.

Placer County Water Agency is a signatory agency to the Water Forum Agreement. The Water Forum Agreement is a comprehensive regional water agreement with two coequal objectives. These are: to provide a reliable and safe water supply for the region’s economic health and planned development to the year 2030 and preserve the fishery, wildlife, recreational, and aesthetic values of the Lower American River.

In order for you to have information on the specific agreements contained in the Water Forum Agreement that apply to PCWA, I am enclosing a copy of the Agreement with several pages tabbed and text highlighted that pertain to PCWA’s agreement with the other Water Forum signatories.

If you have any questions concerning the Water Forum or the Water Forum Agreement, please call me.

Sincerely,

Leo Winternitz
Leo Winternitz, Executive Director
Water Forum/City-County Office of Water Planning

cc: Jim Ray, Jr.
    Einar Maisch
<table>
<thead>
<tr>
<th>Organization</th>
<th>Projects and Issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLACER COUNTY WATER AGENCY - Support is subject to resolution of remaining issues. See footnote (b)</td>
<td>Permanent pumping plant at Auburn Canyon Change in point of delivery for USBR water</td>
</tr>
<tr>
<td>SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD)</td>
<td>Approval of transfers to other Agencies</td>
</tr>
<tr>
<td>SAN JUAN FAMILY (includes CITRUS HEIGHTS WD, FAIR OAKS WD, ORANGE VALE WC)</td>
<td>Diversion facility at Folsom Reservoir Approval of PL 101-514 contract Water Treatment Plant expansion Change of Place of Use with PCWA</td>
</tr>
<tr>
<td>SO. COUNTY AGRICULTURE (includes GALT I. D., CLAY WD, OMOCHUMNE-HARTNELL WD, FARM BUREAU)</td>
<td>Approval of SMUD entitlement or other transfer and Folsom South Canal diversions</td>
</tr>
</tbody>
</table>

a. Note: All suppliers having contracts for Central Valley Project water will be renegotiating those contracts when the CVP Improvement Act Programmatic Environmental Impact Statement is complete.

b. Support for Placer County Water Agency major water supply projects is subject to resolution of these remaining issues: 1) environmentalists’ support for PCWA pumps at Auburn, 2) how water conservation Best Management Practice #5 (Large Landscape Water Audits and Incentives for Commercial, Industrial, Institutional and Irrigation Accounts) will be implemented, and 3) environmentalists’ support for conditions related to release of replacement water in drier and driest years.
## 1995 AND PROPOSED YEAR 2030 SURFACE WATER DIVERSSIONS

Note: The diversions described below, combined with the dry year actions, will meet each supplier's customers' needs to the year 2030.

### AMERICAN RIVER DIVERSSIONS--UPSTREAM OF NIMBUS

<table>
<thead>
<tr>
<th>WATER SUPPLIER/ORGANIZATION</th>
<th>1995 BASELINE (1)</th>
<th>2030 DIVERSION (wet/ave years)</th>
<th>2030 DIVERSION (drier years)</th>
<th>2030 DIVERSION (driest years)(2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Folsom</td>
<td>20,000 AF (19)</td>
<td>34,000 AF(3)</td>
<td>Decreasing from 34,000 AF to 22,000 AF(4)</td>
<td>20,000 AF (5)</td>
</tr>
<tr>
<td>Northridge Water District (17)</td>
<td>0 AF</td>
<td>29,000 AF(9)</td>
<td>0 AF (10)</td>
<td>0 AF</td>
</tr>
<tr>
<td>Placer County Water Agency (6) (7) [Subject to resolution of remaining issues (21)]</td>
<td>8,500 AF</td>
<td>35,500 AF(3)</td>
<td>Continue to divert 35,500 AF, with a replacement to the river equivalent to their drier diversions above baseline. The drier the year, the more water would be replaced up to 27,000 AF (4) (20)</td>
<td>Continue to divert 35,500 AF, with a replacement of 27,000 AF to the river. (20)</td>
</tr>
<tr>
<td>City of Roseville (7)</td>
<td>19,800 AF</td>
<td>54,900 AF(3)</td>
<td>Decreasing from 54,900 AF to 39,800 AF with a replacement to the river equivalent to their drier diversions above baseline. The drier the year, the more water would be replaced up to 20,000 AF (4)</td>
<td>Continue to divert 39,800 AF, with a replacement of 20,000 AF to the river.</td>
</tr>
<tr>
<td>San Juan WD &amp; Consortium in Sacramento County (Citrus Heights WD, Fair Oaks WD, Orange Vale Water Co)</td>
<td>44,200 AF(8)</td>
<td>57,200 AF(3)</td>
<td>Decreasing from 57,200 to 44,200 AF(4)</td>
<td>44,200 AF</td>
</tr>
</tbody>
</table>

*Water Forum Agreement - January 2000*
### 1995 AND PROPOSED YEAR 2030 SURFACE WATER DIVERSIONS -  *Continued*

#### AMERICAN RIVER DIVERSIONS--BETWEEN NIMBUS & THE MOUTH

<table>
<thead>
<tr>
<th>WATER SUPPLIER/ORGANIZATION</th>
<th>1995 BASELINE(1)</th>
<th>2030 DIVERSION (wet/ave years)</th>
<th>2030 DIVERSION (drier years)</th>
<th>2030 DIVERSION (driest years) (2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carmichael WD (18)</td>
<td>12,000 AF</td>
<td>12,000 AF</td>
<td>12,000 AF</td>
<td>12,000 AF</td>
</tr>
<tr>
<td>City of Sacramento</td>
<td>50,000 AF</td>
<td>310 CFS (12) (13)</td>
<td>90,000 AF(15)</td>
<td>50,000 AF</td>
</tr>
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</table>

#### SACRAMENTO RIVER DIVERSIONS

<table>
<thead>
<tr>
<th>WATER SUPPLIER/ORGANIZATION</th>
<th>1995 DIVERSIONS</th>
<th>2030 DIVERSION (wet/ave years) (14)</th>
<th>2030 DIVERSION (drier years)(14)</th>
<th>2030 DIVERSION (driest years)(14)</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Sacramento</td>
<td>45,000 AF</td>
<td>290 CFS (13)</td>
<td>290 CFS (13)</td>
<td>290 CFS (13)</td>
</tr>
<tr>
<td>County of Sacramento</td>
<td>0 AF</td>
<td>up to 78,000 AF (16)</td>
<td>up to 78,000 AF(16)</td>
<td>up to 78,000 AF(16)</td>
</tr>
<tr>
<td>Placer County Water Agency (6) [Subject to resolution of remaining issues (21)]</td>
<td>0 AF</td>
<td>35,000 AF</td>
<td>35,000 AF</td>
<td>35,000 AF</td>
</tr>
<tr>
<td>Natomas Central Mutual Water Co. within Sacramento County</td>
<td>53,000 AF</td>
<td>45,600 AF</td>
<td>45,600 AF</td>
<td>45,600 AF</td>
</tr>
</tbody>
</table>
III. SACRAMENTO RIVER SUPPLY FOR NORTH SACRAMENTO COUNTY AND PLACER COUNTY

A. Intent

All signatories recognize there would be benefits from a Sacramento River diversion to serve the north area of Sacramento County and Placer County. This could be an additional source of water for conjunctive use in the North Area groundwater subarea of the basin. It could also provide a surface water supply to help meet a portion of some purveyors' needs in all years. This would contribute to a reliable supply for the area. It would also reduce the need for some purveyors to divert from the American River in drier years.

B. Sacramento River Supply for North Sacramento County and Placer County

Several purveyors in the north Sacramento county area have already taken the lead in constructing a pipeline to take American River water from Folsom Reservoir west across the north part of Sacramento County. This major pipeline could provide surface water for the North Area conjunctive use program.

In addition, the Water Forum Agreement includes support for an upgrade to Natomas Central Mutual Water Company's diversion structure on the Sacramento River. This upgrade would provide state-of-the-art fish screening. This could be a joint facility to also serve water to Placer County.

In the future it would be beneficial to interconnect the north area pipeline with a Sacramento River diversion. The north area pipeline was constructed large enough to deliver water from either the American or Sacramento Rivers.

Such an interconnection would have several benefits. First, it would provide purveyors with an alternative source of water should there be any problem with their American River supply. Second, it would allow purveyors access to water transfers from the Sacramento or Feather Rivers.

The Lower American River could also benefit because a Sacramento River diversion would reduce the need for diversions from the American River in driest years. This could be an option for purveyors needing alternative water supplies to meet customers' needs in drier years while reducing impacts of diversions from the American River.

This option would be available to purveyors with direct access to the Sacramento River. It could also be an option for purveyors further upstream that could participate through an exchange. They could continue to make diversions from the American River in drier and driest years if other purveyors switched from their American River supplies to the Sacramento River supply.
It is also recognized that winter-run salmon have been listed as endangered under the Endangered Species Act, and steelhead have been listed as threatened. Any diversion would have to fully comply with the Endangered Species Act.

C. Specific Agreements on Sacramento River Water Supply for North Sacramento County and Placer County

1. All signatories to the Water Forum Agreement agree that an environmentally upgraded Sacramento River diversion to serve the north Sacramento county area and Placer County as described above would provide important benefits to the region.

2. All signatories to the Water Forum Agreement agree to work in good faith to develop a project consistent with their interests that would:

   a. Consolidate several of Natomas Central Mutual Water Company’s diversions;

   b. Upgrade fish screens at the consolidated diversion;

   c. Accommodate the diversion of 35,000 AF of water by Placer County Water Agency consistent with its Purveyor Specific Agreement;

   d. Accommodate the diversion of 29,000 AF of water for delivery to Northridge Water District consistent with its Purveyor Specific Agreement;

   e. Subject to additional negotiations among Water Forum signatories, potentially accommodate other diversions (e.g. City of Sacramento diversions);

   f. Interconnect that consolidated diversion with the north area pipeline which delivers water from the American River. This interconnection will help meet water needs in northern Sacramento County and Placer County.

   g. Support for this diversion is also subject to all elements of the Water Forum Agreement including the Caveats in Section Four, I, including:

1. Caveat 3.a., Project-specific compliance with the California Environmental Quality Act, and where applicable, the National Environmental Policy Act, federal Endangered Species Act and California Endangered Species Act.

2. Caveat 3.f., Adequate progress in addressing the Sacramento River and Bay-Delta conditions associated with implementation of the Water Forum Agreement.
PLACER COUNTY WATER AGENCY

A. INTRODUCTION

The Placer County Water Agency (PCWA) serves areas within Placer County on the west slope of the Sierra. These areas include the communities of Auburn, Loomis, Newcastle, Penryn, Rocklin and Lincoln. PCWA also wholesales water to Roseville and San Juan Water District.

PCWA currently has about 29,000 connections, all of which are metered.

In the 1960's, PCWA constructed its Middle Fork American River Project (MFP) which includes several reservoirs on the Middle Fork American River and its tributaries. These Reservoirs provide both electrical energy generation and a consumptive water supply. The water afforded through the MFP provides PCWA a water right to 120,000 acre feet (AF) of American River water. PCWA also has a contract with the United States Bureau of Reclamation (USBR) for 117,000 AF of Central Valley Project (CVP) water. There is a difference of opinion between the USBR and PCWA as to whether the USBR has an obligation to deliver more than 35,000 acre-feet of CVP water in the absence of an Auburn Dam. The place of use for the PCWA water entitlements is within Placer County.

PCWA has contracts with San Juan Water District for delivery of 25,000 AF, the City of Roseville for delivery of 30,000 AF, and Northridge Water District for delivery of 29,000 AF.

PCWA also contracts and receives 100,400 acre-feet annually from PG&E for water imported into Western Placer County from the Yuba and Bear Rivers. PG&E uses this water for power generation and then sells it to PCWA for consumptive use.

PCWA is negotiating with the USBR for the right to take its 35,000 AF of CVP entitlement from the Sacramento River and/or Feather River.

A. SEVEN ELEMENTS OF THE WATER FORUM AGREEMENT: INTEGRATED PACKAGE

In order to achieve the Water Forum's two coequal objectives, providing a safe reliable water supply and preserving the values of the Lower American River, all signatories to the Water Forum Agreement need to endorse and, where appropriate, participate in each of seven complementary actions.

- Increased Surface Water Diversions
- Actions to Meet Customers' Needs While Reducing Diversion Impacts in Drier Years
- Support for an Improved Pattern of Fishery Flow Releases from Folsom Reservoir
- Lower American River Habitat Management Element
- Water Conservation Element
• Groundwater Management Element
• Water Forum Successor Effort

For each interest to get its needs met, it has to endorse all seven elements. Based on this linkage, signatories agree to endorse and, where appropriate, participate in all seven of these elements.

C. BASELINE DIVERSIONS FROM AMERICAN RIVER

Baseline diversions represent the historic maximum amount of water diverted annually from the American River through the year 1995.

The baseline for PCWA's American River diversion is 8,500 AF, which represents PCWA's own usage. Water that PCWA sells to purveyors is discussed in their Purveyor Specific Agreements (see San Juan Consortium, City of Roseville, and Northridge WD Specific Agreements).

D. AGREEMENT FOR MEETING PLACER COUNTY WATER AGENCY'S WATER SUPPLY NEEDS TO THE YEAR 2030

1. MOST YEARS: As it applies to the PCWA portion of the agreement, Most Years is defined as follows: Years when the projected March through November Unimpaired Inflow to Folsom Reservoir is greater than 950,000 acre feet.

In most years, PCWA will divert and use 35,500 AF from the American River.

PCWA will also divert and use 35,000 AF from the Sacramento and/or Feather Rivers if exchanges of equal amounts can be made with others under terms acceptable to PCWA.

If circumstances prevent PCWA from developing the diversion from the Sacramento and/or Feather Rivers referred to above, PCWA and the other members of the Water Forum Successor Effort will enter into negotiations with the objective of finding a mutually agreeable alternative.

2. DRIER YEARS: As it applies to the PCWA portion of the agreement, Drier Years is defined as follows: Years when the projected March through November Unimpaired Inflow to Folsom Reservoir is less than 950,000 acre feet and greater than or equal to 400,000 acre-feet.

During drier years PCWA will divert and use 35,500 AF from the American River and will replace water to the River from reoperation of its MFP reservoirs in the following amounts, with
the amount of water released to the River for unimpaired inflow quantities between 950,000 AF and 400,000 AF linearly proportional to the amounts shown below:

<table>
<thead>
<tr>
<th>Unimpaired inflow to Folsom Reservoir</th>
<th>Amount of Reoperation Water</th>
</tr>
</thead>
<tbody>
<tr>
<td>950,000 AF</td>
<td>0 AF</td>
</tr>
<tr>
<td>400,000 AF</td>
<td>27,000 AF</td>
</tr>
</tbody>
</table>

PCWA would make the releases contingent upon the following conditions:

a. its ability to sell the released water for use below the Lower American River on terms acceptable to PCWA,

b. PG&E's agreement to such reoperation until the present power purchase contract with PG&E expires (presently anticipated by year 2013), and

c. PCWA's determination that it has sufficient water in its reservoirs to make the additional releases to mitigate conditions in dry years without jeopardizing the supply for PCWA's customers. (Note: operational modeling for PCWA based on historical hydrology and projected 2030 requirements as set forth in the Water Forum Agreement has shown that reoperation water should be available for such release and sale without drawing MFP reservoirs below 50,000 acre-feet.).

The source of this replacement water in drier years would be water not normally released in those years from the PCWA Middle Fork Project.

PCWA will also divert and use 35,000 AF from the Sacramento and/or Feather River if the exchanges referred to in 1 above are perfected.

3. DRIEST YEARS (i.e. CONFERENCE YEARS): Defined for purposes of the Water Forum Agreement as follows: Years when the projected March through November Unimpaired Inflow to Folsom Reservoir is less than 400,000 acre feet.

In the driest years, PCWA will continue to divert and use 35,500 AF from the American River. Subject to the conditions set forth in 2 above, during the driest years PCWA will replace 27,000 AF of water to the River from reoperation of their MFP reservoirs.

However it is recognized that in years when the projected unimpaired inflow to Folsom Reservoir is less than 400,000 acre feet there may not be sufficient water available to provide the purveyors with the driest years quantities specified in their agreements and provide the expected driest years flows to the mouth of the American River. In those years PCWA will participate in a conference with other stakeholders on how the available water should be managed. The conferees will be guided by the Conference Year Principles described in Section Four, 1. of the Water Forum Agreement.
June 22, 2001

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

Via: Fax and Regular Mail

Fax No. 889-7499

Regarding: Comments on the Supplemental Notice of Preparation (NOP) of a Draft EIR for the Placer Vineyards Specific Plan, Focusing on Interim and Long Term Water Supply

Dear Mr. Yeager:

The City of Roseville Community Development Department appreciates the opportunity to comment on the Supplemental NOP for the Placer Vineyard Specific Plan (PVSP) project Interim and Long Term Water Supply. In particular, thank you for consideration of our comments at this time.

NOP Comments

Consultation with Water Agencies

Section 15083.5 of the CEQA Guidelines requires the lead agency to submit a request to the appropriate public water system(s) that would serve the proposed project, for an assessment indicating whether the projected water demand associated with the proposed project can be accommodated by the water system. The assessment(s) provided by the water systems should be included in the EIR in accordance with the Guidelines.

Distribution

1. PCWA has allocated water in their March 13, 2001 water planning document but distribution remains a major issue. The interim solutions address this issue, but would require significant efforts, and would be subject to regulatory review and approval.

2. The City of Roseville does not have capacity at the Water Treatment Plant, or within the distribution system, for an interim solution without a timeline for a transition to a long-term supply solution.
Long-Term Solutions

The EIR should include measures to ensure that the long-term water supply will be secured prior to project approval. The long-term supply options (diversion off the Sacramento River) have many regulatory and cost hurdles to overcome. Because the long-term solution is fraught with issues, the EIR should address the potential impacts if the long-term solution does not come about in a time frame anticipated by the EIR or extends beyond the short-term supply agreements. What options for providing water service would remain?

There is no reference as to when the long-term solution will be secured and what the limitation is on the interim water supply. The EIR should include a more comprehensive discussion of the proposed time-lines.

Interim Solutions

Once a supply from an interim source is in place, there would be little incentive to move other projects forward. This could be especially true of a developed groundwater system which looks different than a surface water system. The EIR should include measures requiring eventual implementation of the long-term solutions should be identified in the EIR.

Thank you for the opportunity to provide comments on this project. Please forward any future project related CEQA documentation to Mr. Mark Morse, Environmental Coordinator, City of Roseville Community Development Department, 316 Vernon Street, Roseville, California 95678.

If you have questions, please feel free to call me at 774-5334.

Sincerely,

Mark Morse  
Environmental Coordinator
Lori Lawrence  
Placer County Planning Department  
11414 B Avenue  
Auburn, CA 95603

Dear Ms. Lawrence:

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Placer Vineyards Specific Plan  
State Clearinghouse No. 1999062020

Sacramento Regional County Sanitation District (SRCSD) has reviewed the subject documents and has the following comments.

The SRCSD is a publicly owned wastewater agency serving over one million people by providing wastewater conveyance and treatment for the major Sacramento Metropolitan Area. The SRCSD owns the Sacramento Regional Wastewater Treatment Plant (SRWTP) and is responsible for its operation. Treated wastewater that is discharged into the Sacramento River at a point below the town of Freeport must comply with strict water quality limits that are specified in a discharge permit.

The SRCSD is interested in the subject project as it may impact the SRWTP operation and/or discharge. The SRCSD appreciates the opportunity to review and comment on the subject EIR and requests to be put on your mailing list.

If you have any questions regarding these comments, please call Stephen Norris at 876-6053 or myself at 876-6006.

Very truly yours,

Neal B. Allen  
Senior Civil Engineer

NBA/SN:sd

cc: Stephen Norris