2. Will the developer be required to fund all road improvements to Clark Tunnel Road South? If not, please describe in detail how funding would be obtained to improve Clark Tunnel Road South should it remain open. I85-5
3. When would the road improvements be completed if Clark Tunnel Road to the South were to remain open? Please provide dates in relationship to Bickford Ranch development. I85-6
4. Does the County own the required easements along Clark Tunnel Road to widen it to 32 feet? If no, how will these easements be obtained? Almost all landowners along Clark Tunnel Road have signed a petition stating they will not sell their property for road widening purposes. I85-7
5. DEIR Volume I, page 16-57 states: As for Sub-Alternative 5-1, Clark Tunnel Road south of the project site would remain at its existing grades and configuration, because improvements to accommodate substantially increased traffic would not be economically feasible.
6. We request that a detailed plan be provided showing how exactly Clark Tunnel road to the South would be made safe. We want diagrams showing where curves will be lengthened, sight distances improved, and road width increased. I85-8
7. If Clark Tunnel were to be closed how would the County prevent the reopening after Bickford Ranch is populated and the residents begin requesting use of the road? I85-9
8. If Clark Tunnel Road is left open to the south, what specific improvements will be done at the English colony/Taylor rd intersection, Taylor Rd/Penryn rd intersection, and I-80 /Penryn rd intersections to prevent LOS at these intersections from deteriorating to unacceptable levels as a result of Bickford Ranch traffic? I85-10

Bickford Ranch Draft EIR Comments (Groundwater):

Due to the rural nature of the surrounding areas, all residents with properties in close proximity to the proposed development are on wells, with the Ridge area above clearly important in recharging ground water supplies to the area as indicated in the DEIR. Many of these wells predate the Placer County Water Well Construction Ordinance of 7/90, and some of the wells predate the State of California Department of Water Resources water well standards bulletin 74-81, which was published in December, 1981. The Bickford Ranch preliminary specific site plan projects the daily use of two million gallons of water to irrigate the golf course and roadway corridors. Additionally, 1950+ homes are proposed for the development. These areas will receive relatively heavy applications of fertilizers and weed control chemicals in spite of the proposed mitigation to "minimize" use of such chemicals. Common sense and knowledge of the movement of nitrates with water suggest the strong possibility contaminants from Bickford Ranch could end up in the local groundwater supplies with possible subsequent well contamination. We consulted with a University of California Geologist with expertise in hydrogeology, and it is his opinion that this issue requires considerable analysis and should be addressed in detail in the EIR. He feels the threat of groundwater contamination could be significant as a I85-11

result of the percolation of water throughout the recharge area due to constant watering of the golf course and residences on the ridge. Additionally, the 7 proposed retention ponds will prevent runoff, but increase the possibility for groundwater contamination in the area. Currently, there is no study of the groundwater aquifers supplying the Penryn area. Although local groundwater studies have been limited in the General Plan area; one such study areas with contaminated groundwater in Placer County: I85-12

From: http://www.placer.ca.gov/placer/permits/hbpcp/05natres.htm

The groundwater found in the Plan area is utilized heavily as a source of domestic water. Fortunately it is still apparently of fairly high quality in most areas. However, in the adjacent Shirland Tract area (Auburn/Bowman Community Plan), unacceptable nitrate levels have now been encountered in the groundwaters to approximately 100 feet in depth below one subdivision. In addition, in one area along Auburn Folsom Road between Rock Springs Road and Robin Lane the groundwater below a subdivision has shown marginal suitability for domestic use due to nitrates and other chemical contaminants. I85-13

The above clearly indicates groundwater contamination is occurring now, and this vital resource cannot be taken for granted and must be given considerable attention when developing properties in rural areas.

In the event well contamination occurs due to this development, I would predict serious consequences for all parties involved, with the disruption of the lives of the many surrounding residents and sacrifice of surrounding property values. It would seem to be a most obvious cause for considerable concern, which demands attention. Development plans dealing with **runoff containment** are glaringly inadequate in this case. There is no mention or consideration given in the EIR report to the fact the area's relatively "impermeable" crust will be altered by deep ripping to allow construction of the golf course, sewer lines, water lines, natural gas/other utilities, and then exposed to what will likely be over 3 million gallons of water applied slowly each and every day. It is clear this issue has been raised before by concerned citizens who have taken the time to address their concerns to the Planning Department in writing, as the letters of these citizens are in the EIR report. What is missing, however, is a through analysis of HOW AND WHY the project is NOT going to contaminate our wells, AND WHAT MITIGATION FACTORS ARE IN PLACE SHOULD THE "IMPOSSIBLE" HAPPEN? Table 2-2, pg. 2-23 of the DEIR indicates potential groundwater contamination to be potentially significant reduced to less than significant by compliance with the recommendations of a limited groundwater investigation. This would appear to the minimally informed to be a ludicrous statement. I85-14

Condition of Project Approval:
Development of Bickford Ranch should be delayed indefinitely until such time as local groundwater studies have been completed and any mitigation issues resolved. Such studies shall be conducted by a qualified company specializing in this area and

who has demonstrated previous expertise in identifying the spread of chemical contaminants through local groundwater sources. The presence of many wells in the surrounding area with willing property owners to allow testing of their wells would facilitate this study.

Groundwater Related Questions/Requests:

1. Will testing of surrounding wells to establish "baseline" data be completed? If not, what actions will be taken to establish baseline data?
2. Will testing of the surrounding property owner's wells include baseline data for nitrates/nitrates in particular, as well as all other chemicals/herbicides which will be used on the golf course under the proposed management program. If not, what will the tests include?
3. Will testing include baseline data for all petroleum products which could be expected as a result of runoff from streets/parking areas, as well as common herbicides/insecticides currently in common use by the general public. If not, what will the tests include? **I85-15**
4. Will surrounding property owner's wells be tested for increased levels above "baseline data" for all chemicals/substances for which baseline data were established? How often will wells be monitored?
5. What period of time will the monitoring be conducted?
6. How will mitigation of groundwater contamination occur? **I85-16**
7. Will adequate financial reserves be placed in an escrow account by the developer to ensure water supplies can be replaced in a timely fashion with no cost to the property owner should contamination of the surrounding wells occur? **I85-17**
8. Will the developer be required to obtain and maintain an insurance policy as a mitigation requirement that would provide adequate funding for all residents should well contamination become widespread in the surrounding community? If so, for what length of time will the developer be required to keep such a policy in effect? What safeguards would be in place to ensure the insurance policy was maintained in force? **I85-18**
9. Please include in the final draft of the EIR the criteria for determining when a particular groundwater resource contamination has occurred for any property surrounding the Bickford Ranch Development.
10. Who will establish the criteria? **I85-19**
11. Please include in the final draft of the EIR the procedural guidelines for mitigation in the event the groundwater becomes contaminated for any property in the surrounding area.
12. Please include in the final draft of the EIR a report and opinion by another specialist (NOT Dames and Moore) in hydrogeology/environmental contamination of groundwater, with particular expertise in the area of fractured bedrock groundwater regarding the possible contamination of surrounding wells and their recommended mitigation. **I85-20**
13. Please include in the final draft of the EIR a geohydrologic characterization of the area to determine how the proposed development will impact the local ground water supply. **I85-21**

14. On page 12-8 of the DEIR is states that detention facilities are proposed to meet the storm water management manual detention requirements of reducing runoff (from the site) to 90 percent of the pre-development runoff rate. Three million gallons per day of additional water will be applied to the ground, but runoff rate will actually be decreased, meaning the water will continue to flow slowly into local stream channels which are identified as one of the most important potential groundwater recharge zones. **Question: What rational did the DEIR utilize to conclude groundwater recharge will not be increased through the use of 108 acre feet of retention storage and slow, but nearly continuos runoff into local stream channels identified as groundwater recharge zones?** I85-22
15. Please provide numbers in terms of inches of rain per year that two million gallons over 313.3 acres would equal. **Question: If you apply two million gallons of water daily over 313.3 acres, how many inches of rainfall per year is this application of water equal to?** I85-23
16. On page 12-8 of the DEIR it states that the ravine detention ponds will be constructed by installing berms across ravines to restrict the flow. The berm will have a low flow outlet and a high flow spillway. These ponds will be normally dry. **Question: How is it that these ponds will be normally dry if two million gallons of additional water will be applied daily to the golf course which page 12-17 states drains into the Auburn Ravine and Clover Valley Creek?** I85-24
17. On page 12-18 the DEIR states that recharge potential is already limited within the project site and that downward migration of water from the surface is inhibited by group D solids over 75 percent of the project site. Due to shallow soil development over nearly impervious material in these areas the creation of impervious surfaces would not significantly alter recharge potential. **Question: If the additional two million gallons of water used on the golf course daily doesn't go into the ground and doesn't go into the Auburn Ravine and Clover Valley Creek then where does it go?** I85-25
18. **What construction method is being used on the detention ponds and lakes to minimize ground water recharge? Please include a complete engineering plan for all detention ponds and lakes, as well as completed engineering design for reducing groundwater runoff to 90% of pre-project levels** I85-26
19. Page 12-4 of the DEIR states that seasonal springs have been observed along the slopes of the main ridge (Boulder Ridge), likely due to infiltration through localized fissures in the cap rock and the underlying Mehrten formation. **Question: If the presence of seasonal springs along the slopes of Boulder ridge is most likely due to infiltration through fissures in the cap rock then could it also be deducted that these and other fissures recharge the ground water which we use for drinking water?** I85-27
20. Many additional fissures and cracks will be created in the cap rock due to installation of water and sewage lines. It has been stated that seasonal springs along Boulder ridge are most likely due to infiltration through localized fissures. **Request: I request that the EIR fully study and document the affect of ripping of the cap rock and its affect on the ability of water to infiltrate.** I85-28

21. Volume I of the Bickford Ranch Specific Plan DEIR Page 12-7 states that SWRCB policy prohibits degradation of groundwater quality, and in cases where impacts occur, the RWQCBs typically require restoration of impacted aquifers such that residual concentration do not exceed the U.S. EPA's maximum concentration limits for drinking water. **If contamination occurs, how will the currently proposed mitigation measures provide restoration of impaired wells?** I85-29
22. My understanding is that no monitoring wells for groundwater are proposed, only monitoring of runoff from the golf course. **Is this correct? If yes, why haven't monitoring wells been proposed?** I85-30
23. Placer County Water Agency has indicated the 42" pipeline being installed through the Penryn area to connect with the city of Lincoln will have a 16" stub just west of the Penryn School along English Colony Rd. This stub is currently being planned in conjunction with the Bickford Ranch developers and essentially "reserved" for that project should it occur. PCWA officials have indicated that this stub will be almost at capacity when connected to Bickford Ranch and would have very minimal ability to provide water to households in the Penryn community. Further, PCWA engineers have stated at Penryn MAC meetings the 42" pipe would not be able to be connected to once installed, except at preplanned "stub" sites with the stub connections built into the 42" pipe. This suggests it would be economically infeasible to get water delivered to the local residents should the Bickford Ranch project contaminate our wells. **As a condition of project approval, will Bickford Ranch be required to upgrade the 16" stub to a larger size (20"minimum) to provide adequate capacity to serve the community should well contamination occur due to the Bickford Ranch Project? If not, will conditional approval of the Bickford Ranch Project be subject to adding a second "stub" near the Penryn School to be available to the Penryn Residents in the future? If not, what will be done to ensure a supply of water to Penryn residents should well water contamination occur.** I85-31

Bickford Ranch Draft EIR Comments (Native Trees):

Volume I of the Bickford Ranch Specific Plan DEIR Page 13-28 states that approximately 11,700 native trees protected by the Placer County Tree Preservation Ordinance (protected trees), which includes native trees measuring over 6 inches in DBH (diameter at breast height), would be removed because of proposed project construction. Most of these affected trees would be oaks, although other species within oak woodlands and riparian forests would also be affected. Many of the oaks to be removed onsite are 50-150+ years old and cannot be replaced in the short term. Volume I, Page 13-23 states that approximately 95% of the trees occurring on the project site are oaks, including blue oak, but also interior live oak and valley oak. Within the water supply pipeline alignment, a total of between 60 and 100 oaks and native trees with a DBH of 6 inches or greater were identified.

The 1994 PCGP page 109 states: The County shall work toward the public acquisition of creek corridors, wetlands, and significant ecological resource areas as public open space. Page 22 of the PCGP states: that sensitive habitat buffer zones are required to separate any type of urban development from such sensitive habitat

areas as stream corridors, wetlands, sensitive species habitats (i.e., riparian vegetation), and old growth forests, where the land-altering aspects of development itself, and/or the secondary effects of development may degrade important habitat areas. Page 110 of the 1994 PCGP states: The County shall identify and protect significant ecological resource areas and other unique wildlife habitats critical to protecting and sustaining wildlife populations. Some of the significant ecological resource areas listed include large areas of non-fragmented natural habitat, including Blue Oak Woodlands, Valley Foothill Riparian, vernal pool habitat. Identifiable wildlife movement zones

1. What is the definition of a heritage status placed on trees and what are the protection requirements for trees with heritage status? **I85-32**
2. Does the 1950+ acre Bickford Ranch site or any portion of the site meet the criteria to be considered a non-fragmented natural habitat? If no, why? **I85-33**
3. Does the 1950+ acre Bickford Ranch site or any portion of the site meet the criteria to be considered an Identifiable wildlife movement zone? If no, why? **I85-34**
4. Does the 1950+ acre Bickford Ranch site or any portion of the site meet the criteria to be considered any other significant ecological resource area as listed in 6.C.1 of the 1994 PCGP, but not listed in the DEIR? If yes, please identify and describe. **I85-35**
5. The DEIR states that within the project site, sparse blue oak woodland occurs on the central ridgeline. What is the expected reason for sparse woodlands in these areas? Does it have anything to do with the soil depth? Will the central ridgeline be used as an oak replanting area? **I85-36**
6. Please provide me with a copy of the Placer County Tree Preservation Ordinance. **I85-37**
7. What is the estimated number of trees not meeting the criteria of 6 inches DBH that will be removed because of proposed project construction? **I85-38**
8. Of the tree types being removed, what types are considered rare and/or endangered? Please describe a rare or endangered classification and what protection trees classified as such have. Are there other classifications for trees identified at the project site? If yes, please describe these classifications and the protection provided to trees under such classifications. **I85-39**
9. Is the water supply pipeline alignment mentioned on page 13-23 the irrigation canal pipeline? If yes, why is this pipeline alignment being allowed as all canal corridors are to be set aside as open space? No homes should be built on canal corridors and therefore no loss of trees should be allowed along canal corridors! **I85-40**

Volume I, page 13-48 Mitigation Measure B-A states the plan will require replacement of approximately 10,653 oak trees at a ratio of 2:1 using native oak trees grown from acorns collected onsite or in the immediate vicinity. A total of approximately 21,200 trees will be planted at an average density of 100 trees per acre. Plantings will be required to meet a minimum survival rate of 80 percent at the end of a five-year establishment period.

1. Where specifically will these trees be planted? Please provide me with a project site map. Which areas planned for tree planting are sparsely populated with oaks at this time? I85-41
2. How can the proposed density of 100 trees per acre be possible? What do experts estimate will be the survival rate when trees are planted this close together? What would be the expected survival rate at 5, 10, and 20 years. I85-42
3. Appendix C of the 1994 PCGP states that the maximum number of 1950 dwellings may not be realized due to site constraints. Obviously the protected Oak trees are another site constraint! I85-43
4. The survival rate of 80 percent of trees at the end of a five-year establishment period is absolutely unacceptable. This is only 3.3 % of a 150-year-old tree's life. Who proposed this type of mitigation for these heritage oak trees? I request that the survival rate of 80 percent be at the end of 30 years at a minimum. Will Placer County require a longer than five year establishment period? If yes what will this time period be? If no, why? I85-44
5. What plans does Placer County have for the correction of this major environmental impact to our protected oak trees? I85-45
6. CEQA of 1970 is one of California's most important environmental laws and it states that the County must disclose to the public reasons for agency approvals of projects with significant environmental effects.
7. Why did Placer County adopt a Bickford Ranch Specific Plan that considers a density of 1950 homes? This density can not be realized because of the site constraints, including protected oak trees and required open space. I85-46

Bickford Ranch Draft EIR Comments (Legal Authority):
Volume II of the Bickford Ranch Specific Plan DEIR appendix A3 outlines the legal authority under which Placer County is authorized to adopt the Bickford Ranch Specific Plan. The provision of article 8, sections 66450 through 65457 of the Title 7 Planning and Land Use Law, California Government Code requires that a specific plan be consistent with the adopted general plan. Page 1 and 2 of the 1994 Placer County General Plan states:

a. A general plan is a legal document, required by state law, that serves as a community's "constitution" for land use and development.
b. The general plan provides the framework for the exercise of these powers by local officials. By virtue of state law and case law, all zoning, subdivision approvals, and public works projects must be consistent with the general plan.

The applicant's plan is clearly not consistent in many areas with the general plan and appendix C of the general plan. Inconsistencies with the 1994 PCGP include, but are not limited to:

1. sensitive habitat buffers
2. protection of large areas of non-fragmented natural habitat, including Blue Oak Woodlands, Valley Foothill Riparian, and vernal pool habitat

3. protection of identifiable wildlife movement zones
4. protection of wetland areas

Specific examples of inconsistencies with the PCGP include but are not limited to:

5. changes in side yard setbacks for Rural Residential lots
6. changes in wetlands setbacks from 50 to 10 feet,
7. allowing secondary dwellings in all residential categories of .3 acres or more
8. building on the slopes of Boulder Ridge which are designated as open space,
9. building houses over existing canal corridors which are designated as open space,
10. removing 11,000+ native trees,
11. proposing to fill in riparian habitat with "spoil" fill dirt/rock
12. proposing three (not two) communities within the development,
13. worse than level of service (LOS) "C" on rural and urban/suburban roadways

I85-47

Questions/Requests:

1. What requirements will Placer County place on the applicant to correct the above inconsistencies? I85-48
2. Will homes presently planned for the canal corridors and slopes of Boulder Ridge be eliminated prior to project approval? I85-49
3. What other inconsistencies have been identified by the county and will they be eliminated? If not, why? I85-50
4. Will the Placer County Planning Department recommend the applicant conform to all Placer County 1994 general plan requirements, including Appendix C of PCGP? If not, please describe each discrepancy allowed and the reason for the exception. I85-51
5. Will Placer County Planning Department recommend the prohibition of Development Standard amendments after project approval? If not, why? I85-52

Bickford Ranch Draft EIR Comments (Visual):

Boulder Ridge south of the transmission tower is viewed by many homes currently located on Butler, Clark Tunnel, Ridge View, and Callison, just to name a few. Homes proposed for this area of Boulder Ridge will definitely be silhouetted against the sky as well as present a visually disturbing appearance compared to the natural surroundings currently viewed.

General Plan Requirements: I85-53

Appendix C of the General Plan states that the planning and design in the specific plan should give particular attention to the Visual and Scenic Resource policies and Development Form and Design policies of this General Plan. The General Plan Development Form and Design section (page 47) states: The County shall require that all new development be designed to be compatible with the scale and character of the area. Structures, especially those outside of village, urban, and commercial

centers, should be designed so that: a) **they do not silhouette against the sky above ridgelines or hilltops**

Visual Related Questions/Requests:

1. Why is the County allowing this developer to violate the 1994 General Plan that specifically states that the **slopes of Boulder Ridge shall be open space**? Any structures built on the slopes of Boulder Ridge are a violation of the law as stated in the General Plan.
2. What measures will be taken prior to project approval to ensure that no houses will be built on the ridges on critical lots (Vol. II of DEIR, Appendix A4, pages 1-5 to1-10) for Ridges 6-8,16, and Heritage Ridge 25 until trees have grown to an adequate size (per height restriction tables) to eliminate the house silhouette against the sky (fig 15-7 of DEIR)? **I85-54**
3. Who would be the point of contact for a citizen should premature construction on these lots begin? **I85-55**
4. What types of trees are being planted specifically on the ridges? **I85-56**
5. If fast growing, short lived (less than 20 years) trees will be planted then we request that trees with longer lives also be planted. Please provide information defining the fast growing/short lived and slow growing/long lived tree types and locations. **I85-57**
6. Our understanding is that the developer is currently negotiating with PCWA for water storage tank(s) locations. What are the sizes and locations of all currently planned storage tanks? How will they be hidden from view? Does the County have the same rules for water storage tanks as they do homes in regards to silhouetting the sky? **What will be done to ensure that the storage tanks do not silhouette against the sky above ridgelines or hilltops?** **I85-58**

Bickford Ranch Draft EIR Comments (Open Space):

The 1994 PCGP page 109 states: The County shall work toward the public acquisition of creek corridors, wetlands, and significant ecological resource areas as public open space. Page 22 of the PCGP states: that sensitive habitat buffer zones are required to separate any type of urban development from such sensitive habitat areas as stream corridors, wetlands, sensitive species habitats (i.e., riparian vegetation), and old growth forests, where the land-altering aspects of development itself, and/or the secondary effects of development may degrade important habitat areas.

The current specific plan proposes that homes be located on slopes of Boulder Ridge and corridors along canals, as well as several lots having significant drainage systems for the Ridge running through the property.

General Plan Requirements:
Appendix C of the General Plan, which provides **specific development standards** for the Bickford Ranch Area, states that any development proposal for the Bickford Ranch area **shall** set aside significant open space areas and include: I85-59

a. **Slopes of Boulder Ridge**
b. **Drainage ways**
c. **Corridors along canals**
d. **Corridors along major roadways**

Additionally, the General Plan Policies section (page 42) states that new development in scenic areas (e.g., ridgelines and steep slopes) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

a. **Avoids locating structures along ridgelines and steep slopes**

I85-60

Condition of Project Approval:
All violations of the 1994 PCGP regarding open space and sensitive habitat buffers must be eliminated prior to project approval. The development plan must be modified to eliminate home sites from the slopes of Boulder Ridge (particularly applicable to lots on the NE slopes of R-9) and canal corridors pursuant to above Specific and General Plan requirements. It would seem inappropriate and not following the intent of appendix C of the PCGP to allow development over the canal corridors as they have existed. Negotiations between the developer and PCWA to relocate sections of the canal, and thereby relocate canal corridors from their present location, is NOT in accordance with the specific development standards set forth in appendix C of the PCGP. Any agreement between the developer and PCWA which involves relocation of canal corridors should be null and void. I85-61

Open Space Related Questions/Requests:

1. Under what circumstances will the County allow the applicant to violate the 1994 General Plan that specifically states that the **slopes of Boulder Ridge shall be open space**? I85-62
2. Under what circumstances will the County allow the applicant to modify the dimensions of sensitive habitat buffers? I85-63
3. Of the open space shown on the developer's plans, what percentage will be accepted as **public open space** by the County? I85-64
4. Is it possible that the County may only accept the trail corridors as open space? If yes, why? I85-65
5. Under what circumstances will the County allow the applicant to violate the 1994 General Plan that specifically states that drainage ways shall be open space? I85-66
6. My understanding is that when a General Plan specifically uses the word **shall** in defining requirements that these requirements **must** be followed. Is my understanding correct? I85-67
7. What measures are in place for mitigation of open space? I85-68

8. The applicant states that they are providing more open space than required by the County. I disagree with this statement because in the case of Bickford Ranch, specific areas were designated in the 1994 PCGP to be set aside as open space. Bickford Ranch is a unique piece of property in that it contains a high percentage of space that must be kept open in order to be consistent with the 1994 PCGP. The applicant was aware of the site constraints of the property when they purchased it in 1996. I85-69
9. If a violation of the General Plan is allowed, how are the developers being required to mitigate this? Please provide a detailed plan defining all open space mitigation measures and their locations? Specifically, we ask how the canal corridor and Boulder Ridge open space requirements will be mitigated. I85-70

Bickford Ranch Draft EIR Comments (Riparian Sensitive Habitat):
Volume I of the Bickford Ranch Specific Plan DEIR Page 3-12 (Project Description) states that the golf driving range may require approximately 750,00 cubic yards of fill material. This fill area will be used for the disposal of all excess excavation (i.e., rocks, trench spoils, etc.) The driving range location as shown on Figure 9-1 of Volume I of the Bickford Ranch Specific Plan DEIR is located in the same location as a riparian sensitive habitat and riparian wetland as shown on Figure 13-2 of Volume I. The driving range proposed for Bickford Ranch disturbs a major drainage system/riparian habitat.

The General Plan Policies section (page 42) states that the County **shall** require that new development incorporate sound soil conservation practices and minimizes land alterations. Land alterations should comply with the following guidelines: I85-71
1. Limit cuts and fills;
2. Limit grading to the smallest practical area of land

The General Plan policies also state (pg 22-26) "no land use allowed within the buffer (in this case, riparian sensitive habitat) that involves grading or the removal of natural vegetation shall be located any closer than 50 feet to the top of a stream bank or to the outermost extent of riparian vegetation, wetland, or other identified habitat, whichever is greater".

Condition of Project Approval:
Relocation/Elimination of the driving range, with no amount of fill allowed in drainage areas, particularly riparian habitat, which significantly alters the topography of the area.

Questions/Requests: I85-72
1. Please provide in the final draft of the EIR a complete analysis and designation of the ravine proposed for fill and use as a driving range.
2. How can an extreme violation of the General Plan policy be allowed in this case?

3. Please describe the riparian habitat mitigation should this ravine be allowed to be filled (this should be separate from the vernal pool mitigation for this particular area). I85-73
4. How will the 14th greens of the proposed golf course be mitigated considering it is essentially located adjacent and around a riparian drainage system, as well as adjacent to archaeologically significant Indian grinding stones? I85-74
5. I feel it is inappropriate for the Developer of Bickford Ranch to set development Standards that are in conflict with the PCGP in regards to wetlands setback of **50-ft. minimum**. The DEIR Vol. II, Appendix 4A(Bickford Ranch Development Standards), pg. 8-12, 8.7.8 states, "No grading alteration, topography, or construction of structures shall occur within **10 feet** of Delineated Wetlands without appropriate State and Federal permits prior to any work within these areas." **This 10-ft setback proposal should not replace the PCGP setback requirements, and I request the final EIR retain the 50 ft minimum setback.** I85-75
6. I request that Volume I of the Bickford Ranch Specific Plan DEIR Page 4-11 section d concerning sensitive habitat be restudied and rewritten because the current statement that the proposed development is consistent with setbacks as described in Part I of the Placer County General Plan Policy Document is false. The proposed location for the driving range is definitely riparian vegetation! I85-76

Bickford Ranch Draft EIR Comments (Housing Density):
Placer County General Plan, Appendix C Residential uses: A maximum of 1,950 dwelling units, **although this number may not be realized due to site constraints, inclusion of buffers, and other factors that may limit available developable land.**

1. How is the applicant's proposed development consistent in respect to the slopes of Boulder Ridge when the applicant proposes homes to be built on the slopes of Boulder Ridge? I85-77
2. How is the applicant's proposed development consistent in respect to the protection of riparian wetlands and riparian vegetation when the applicant proposes the filling of an entire ravine with rock and trench spoils? I85-78
3. How is the applicant's proposed development consistent in respect to the required sensitive habitat buffers when the applicant proposes changing the setback from 50 to 10 feet? I85-79
4. How is the applicant's proposed development consistent in respect to the canal corridors when the applicant proposes homes to be built over the canal corridors? I85-80

Condition Of Project Approval:
We recommend that the County require that the applicant comply with all "site constrains" required under the 1994 PCGP. We therefore recommend the County disapprove the current proposal for 1950 homes and require the applicant to provide an alternative Bickford Ranch Specific Plan that meets all site constraints. Alternatively, the applicant may choose Alternative 4 as described in DEIR Volume I, page 2-6.

Bickford Ranch Draft EIR Comments (Mitigation Measures):
Volume I of the Bickford Ranch Specific Plan DEIR Page 1-2 and 1-3 states that "Proposed" mitigation measures are those proposed by the Applicant as part of the project; "recommended" mitigation measures are recommended by this Draft EIR and are in addition to those proposed by the Applicant.

Condition of Project Approval:
I propose that the County require the applicant to complete recommended as well as the proposed mitigation measures.

Questions:

1. In what mitigation instances will the applicant/developer be required to complete the recommended mitigation measures in additions to the proposed mitigation measures? **I85-81**
2. In what mitigation instances will the applicant not be required to complete at least the recommended mitigation measures?
3. What actions will be taken to ensure that mitigation measures are carried out as specified?
4. What action may be taken against the applicant if mitigation measures are not completed as listed in the final EIR? **I85-82**
5. What action, if any, may be taken against a County agency if the applicant does not complete mitigation measures as listed in the final EIR?
6. Which agency or agencies will review the following plans to ensure that they meet the requirements of the associated mitigation(s):
   - Post Development stormwater management program **I85-83**
   - Golf Course Chemical Application Management Plan
   - Grading and Erosion control plan
   - Applicant's Lake management plan
7. Will all management plans and/or programs be made available to the public? If not, why? **I85-84**
8. Will the public be allowed to comment on management plans and programs? If not, why? **I85-85**
9. Which agency or agencies will specifically oversee the Biology Mitigation Measures B-D, B-F, and B-Q? **I85-86**
10. How will each off site mitigation for all biological resources provide equal or greater ecological benefits than avoiding said areas within the development pursuant to policy 1.I.2, page 40 of the 1994 of the PCGP? Please provide significant details in laymen's terms. **I85-87**

Bickford Ranch Draft EIR Comments (Development Standards)
Volume II of the Bickford Ranch Specific Plan DEIR, Appendix A4 under Purpose of the Development Standards: the regulations contained within amend and where not consistent, supersede otherwise applicable Placer County ordinances and codes.

The DEIR Vol. II, Appendix A4 (Bickford Ranch Development Standards), pg. 8-12, 8.7.8 states, "No grading alteration, topography, or construction of structures shall occur within **10 feet** of Delineated Wetlands without appropriate State and Federal permits prior to any work within these areas." **This 10-ft setback proposal should not replace the PCGP setback requirements, and I request the final EIR retain the 50 ft minimum setback.** I85-88

Volume II of the Bickford Ranch Specific Plan DEIR, Appendix A4, page 3-2, table 3.2 shows that biking would not be permitted in any of the open space.

Condition of Project Approval:
Any place where the Bickford Ranch development standards are not consistent with the PCGP then the Placer County General Plan Standards shall take precedence over the Bickford Ranch Development Standards.

Questions/Comments related to Development Standards:

1. Which development standards as proposed by Bickford Ranch differ from the Placer County General Plan and/or Placer County ordinances and codes? I85-89
2. If the developer is allowed to violate the Placer County General Plan requirements and/or Placer County ordinances and codes how will each of these violations be mitigated? I85-90
3. In what circumstances does the County allow developers to develop their own development standards which where inconsistent with the General Plan will be allowed to supersede (violate) the law of the General Plan? I85-91
4. My understanding is that the developer must provide significant benefit to the public for the County to provide any type of development agreement. Is this correct? Please document the significant benefit provided to the general public by this development? I85-92

Bickford Ranch Draft EIR Comments (Public Trails System):
Volume II of the Bickford Ranch Specific Plan DEIR appendix A3 outlines the legal authority under which Placer County is authorized to adopt the Bickford Ranch Specific Plan. The provision of article 8, sections 66450 through 65457 of the Title 7 Planning and Land Use Law, California Government Code requires that a specific plan be consistent with the adopted general plan. The 1994 PCGP, Page 100, section 5.C.1 states: The County shall support development of a countywide trail system designed to achieve the following objectives:

a. Provide safe, pleasant, and convenient travel by foot, horse, or bicycle;

•

•

d. Provide for multiple uses (i.e., pedestrian, equestrian, bicycle);

There are numerous references to pedestrian/equine trails in open space areas and open space corridors of the proposed Bickford Ranch development. Volume I, pg. 2-2 of the Executive Summary states "Bicycles would not be permitted along the pedestrian trails/paths or on the equestrian paths." The conceptual site plan for Bickford Ranch Park (Vol. II, Appendix A3, and fig 4-2) allows for a future equestrian arena and staging area for equine recreational enthusiast.

Volume I of the Bickford Ranch Specific Plan DEIR page 2-2 and 3-16 states that bicycles would not be permitted along the pedestrian trails/paths or on the equestrian paths. On page 3-15 the DEIR states that Clark Tunnel Road from SR 193 south to the proposed Bickford Ranch Road would be closed at the property boundary. This portion of Clark Tunnel Road, allowed by an easement, is proposed to be used for pedestrian/equestrian trails, emergency/fire access and a private driveway to an existing residence and one large lot in Bickford Ranch.

Condition of Project Approval:

This is one area where the developer could be required to provide significant public benefit. I request that the County require the developer to complete a multi-use (hike, bike, and equine) trail system in the first phase of any development. All trails systems with the exception of those designated for pedestrians only must be made a multi-use (hike, bike, and equine) trail system. I would estimate that at least 90% of the home sites proposed are not large enough to have a horse and therefore the vast majority of the residents would be hiking, biking, or jogging on the trails, not riding horses. **I85-93**

Public Trails System Questions/Requests:

1. The trail system proposed by the applicant violates the 1994 PCGP by excluding bicycles. Will the County require the applicant to modify their plan to meet the requirements of the 1994 PCGP and provide for a multiple use (i.e., pedestrian, equestrian, and bicycle) trail system? If not, please describe reasons why the applicant will not be required to be consistent with the 1994 PCGP? **I85-94**
2. How will the County ensure that this trail system is implemented as planned by the applicant? **I85-95**
3. My understanding is that the Winchester project plan included a multiuse trail system, but that the developer of this project will not build the trail system included in the final EIR. Is this information correct? What legal mechanism did the Winchester developer use to eliminate their proposed trail system? What ordinances and/or laws does the County of Placer have available to ensure that trails are implemented as proposed? Please describe any and all ordinances, PCGP requirements, etc. in the final EIR. **I85-96**
4. I request that the trail system mapped out and proposed by Wesley Dill as a multi-use trails system be accepted as open space and trail corridors by Placer County and that the County require the developers to install this complete trail system. **I85-97**

5. Will the County require the developers to build the multiuse trail system as proposed by Wesley Dill? If the County chooses not to adopt this system then I ask that a complete report detailing the reasons for not accepting the trail system be included in the final draft of the EIR.
6. Please provide in the final draft of the EIR a description and diagram showing the complete trails system required by the County. Please designate the allowed uses of each segment of the trail system. I85-98
7. The developer actually proposes that a portion of a Clark Tunnel Road be used for pedestrian/equestrian trails and therefore closed to bicycles. This County gravel road is currently used by many bicyclists and the developer should not be allowed to change this. I85-99 What is the County's position on use of Clark Tunnel Road north, should it be closed? I85-100
8. Will allowances for off-road bicycle recreational use be included in the final draft of the EIR? I85-101
9. In view of the fact (established by comparative erosion studies in New Zealand) that horses cause far more erosion than off-road bicycle use, and considering the extremely shallow soils described in the geology sections of the DEIR, would it not seem sensible to provide off-road bicycle trails, either shared or separate? I85-102

Bickford Ranch Draft EIR Comments (Fencing):

Volume II of the Bickford Ranch Specific Plan DEIR, Appendix A5, Figure 14 indicates that the boundary security will be open wire fences with metal posts.

1. Please provide a diagram, similar to figures 14.3 – 14.5 showing fence construction.
2. Will animals such as coyotes, skunks, opossums, etc. be able to pass freely through this fence? If not, we request that an animal friendly fence or no fence at all be installed on the boundaries of the property.

Volume II of the Bickford Ranch Specific Plan DEIR. Appendix A5, Figure 14 indicates that the open vies fence, depicted in figure 14.5 of the same section would be installed along the North border of the Heritage Ridge community along Bickford Ranch Road I85-103

1. This fence presents as shown would seem to present a marked difficulty and barrier to many species of wildlife attempting to pass through the area at night.
2. As a condition of project approval will there be opening in the proposed fence at regular intervals allowing wildlife to pass through?
3. As a condition of the project approval will an animal friendly fence be installed in place of the proposed view fence?

Bickford Ranch Draft EIR Comments (Gated Community):

The Bickford Ranch development proposes the placement of a private golf course/gated community on the Boulder Ridge area, as well as the proposed gating of

the majority of the northern "finger" ridge areas (Fig 8.1, Street Circulation Diagram, Vol. II DEIR, Appendix A3).

General Plan Requirements:
Appendix C of the General Plan, pg. 156, sec. g, provides for the possible provision of a **public** golf course site. No mention or consideration is provided for a private golf course. Additionally, PCGP pg. 36, 1.B.9, states "The County **shall** discourage the development of isolated, remote, and/or walled residential projects that do not contribute to the sense of community desired for the area". The proposed **gated** Heritage Ridge community and "finger" Ridges are clearly in conflict with this goal. I85-104

Condition of Project Approval:
The golf course, if allowed, should be a **public** golf course, and the Heritage Ridge village and all Ridge developments should be developed as **open** communities, consistent with the intent of the 1994 PCGP and surrounding areas.

Bickford Ranch Draft EIR Comments (Tower Park):
Tower Park is poorly situated to be part of an improved park system for the Bickford Ranch development and is situated with a large portion of the "park" in a major drainage system and with a proposed retention pond occupying a major portion. Due to the topography, it would be an inappropriate location for a developed neighborhood park to serve the residents of the eastern portions of the proposed development. Although a larger park development is proposed for the western most portion of the Bickford Ranch development, that park is 3 miles as the crow flies from the proposed Tower Park, and would make it out of reasonable reach for children in homes of the eastern portions of the development. I85-105

Condition of Project Approval:
Relocation of the Tower Park to and area just NW of the currently proposed park to a relatively flat area more suitable for a developed park.

Bickford Ranch Draft EIR Comments (Driving Range Night Lighting):
1. Would the proposed driving range, if built, be allowed to use night lighting to extend hours of operation? If so, this would significantly effect the surrounding rural night sky character in a detrimental way. I85-106
2. Will Placer County specifically prohibit night lighting for the proposed driving range?

Bickford Ranch Draft EIR Comments (Construction Traffic):

Although no specific PCGP section prohibits use of county roads during construction of major developments, use of Clark Tunnel Road by construction equipment for the proposed Bickford Ranch would be a considerable safety issue. Additionally, the **DEIR mitigation measure N-C restricts construction traffic on non-major roads.** The PCGP circulation plan diagram (pg. 28 of PCGP) classifies Clark Tunnel Road as a rural collector road.

I85-107

1. Is Clark Tunnel Road considered a non-major road?
2. Will Placer County, as a condition of any development agreement between the developers and Placer County, require the developers to abstain from using Clark Tunnel Road for heavy equipment transport?
3. What would be the consequences if this agreement was broken, and how would it be enforced?

Bickford Ranch Draft EIR Comments (Green Belt Trees):
The DEIR describes the establishment of a green belt along Ranch Road inside the proposed development, utilizing Poplar trees. It is the consensus of several knowledgeable people poplar trees are short lived, and would be unsuitable for establishment of a forested greenbelt for the long term. The root systems of the poplar trees are very shallow and invasive with damage to adjacent roadways, drainage, and sewer systems likely. I assume Ranch Road would become a Placer County roadway, and require county maintenance (taxpayers $) if roadway damage occurred.

I85-108

1. Is it possible to require longer lived trees be alternated with the poplar trees along roadways (i.e. California sycamore, native oaks) in a proportion much higher than the current 80:20 mix of poplar:oak currently proposed by the DEIR?
2. Will the final EIR make this recommendation and how will it be enforced?
3. Will Placer County, as a part of any development agreement, ensure the developer assumes responsibility for any roadway damage resulting from the invasion of the poplar trees during the first 8-12 years?
4. Will the greenbelts be maintained by Placer County? If so, what will be the funding source for long term maintenance for the greenbelt areas of Bickford Ranch that becomes public property?

Bickford Ranch Draft EIR Comments (Traffic):
There are many significant traffic issues along the Sierra College Blvd corridor which will arise due to development of both the Bickford Ranch project, and other developments to the west of Sierra College Blvd. In order to provide for general the safety as well as LOS required by the PCGP (pg. 152) the following questions come to mind.

1. The DEIR has **no** mitigation measures to ensure the safety of westbound traffic on King Rd. attempting a **left-hand** turn onto Sierra College Blvd. From personal

experience, the increased traffic volume at this intersection as a result of the development will make a left hand turn of this nature dangerous during peak traffic times. Will the developer be required to install a traffic signal at the King Rd/Sierra College Blvd intersection? **I85-109**

2. When would the traffic signal, if required, be installed?
3. What improvements will be made at the Sierra College Blvd/HWY 193 intersection with the traffic mitigation fees mentioned in the DEIR, which change the impact at this intersection from significant to less than significant? What is the time frame for completion of these traffic mitigation measures? **I85-110**
4. What is the time frame for the adding of additional lanes to Sierra College Blvd from the proposed development to I-80? **I85-111**
5. What is the time frame for the completion of changes to the I-80/Sierra College Blvd intersection to provide a westbound on ramp to I-80 from Sierra College Blvd. instead of the current intersection configuration? **I85-112**
6. Will completion of all the above traffic mitigation measures be prior to the estimated completion time for the proposed Bickford Ranch Project? **I85-113**
7. Will bicycle lanes, pursuant to PCGP goals, be included in the proposed Sierra College Blvd improvements? **I85-114**
8. Will trail easements or bicycle lanes be provided in conjunction with the routing of the off-site sewer lines along State Hwy 194 west towards Lincoln? **I85-115**
9. I request that the entire traffic study be redone to make it understandable to the general public as required by CEQA. **I85-116**
10. I request that the final draft of the EIR include a traffic study showing the impact of Loomis' planned traffic light at Del Mar and improvements to English Colony. **I85-117**

Bickford Ranch Draft EIR Comments (Fire Station):
The DEIR (pg. 3-20) states a Fire Station site and facility would be constructed, along with partially equipping said facility. Additionally, supplemental tax assessments for this fire station would be required.

1. Please define "partially equip" in relation to this fire station with a $ figure or equipment list. **I85-118**
2. Does "partially equip" include the purchase of fire engines for both house fires and open space fires?
3. Who would pay the supplemental tax assessments for said fire station, and what would be the estimated assessment tax rate?
4. If the "who would pay" includes parcels outside the proposed Bickford Ranch development, please define the area which would be included in the supplemental tax zone, including parcel #s. **I85-119**
5. At what stage of the development of Bickford Ranch would the fire station be fully staffed and functional? **I85-120**

Bickford Ranch Draft EIR Comments (Fire Protection):
The topography of the Bickford Ranch and the proposed build-out of the northern ridges of Boulder Ridge (Fig 3-4, master lotting plan of the DEIR) has a potential to create significant wildfire danger to the homes on these ridges. The Bickford development wisely proposed open space access easements between parcels at intervals (maximum of 1000') along these ridges. The DEIR (pg. 3-20) states "... fire hydrants will be provided at not more than every 500 feet along all roadways fronting residential and commercial development. Additional fire hydrants may be required to provide fire protection to open spaces."

1. Will fire hydrants be placed at the **open space access points** to assist in wildfire management along the ridges?
2. Will these open space access points be demarcated to ensure the adjacent landowners do not inadvertently block said access points? **I85-121**
3. Who will be responsible for ensuring the maintenance the access points over the long term?
4. Given the steep nature of the slopes along the ridges and inaccessibility by vehicles along these slopes, is the 1000' interval between access points adequate to allow fire hoses to reach the midpoint between intervals or from the nearest fire hydrant? **I85-122**
5. Will roadways be developed into the open space areas to assist in wildfire control? **I85-123**
6. Will the homes along the steeper portions of these ridges be allowed by Placer County against the specific development standards of Appendix C of the PCGP which states the steep slopes of Boulder Ridge shall be maintained as open space? **I85-124**

Bickford Ranch Draft EIR Comments (CFD):
Volume II of the Bickford Ranch Specific Plan DEIR, Appendix A3, Page 10-14 states: The 1982 Mello-Roos Community Facilities District Act enables the County to establish community facilities districts and to levy special taxes to fund a wide variety of facilities and services. The proceeds of the Mello-Roos special tax can be used for direct funding or to pay off bonds or both. The proposed CFD will be formed consistent with the guidelines of the Placer County Bond Screening Committee. The Placer County Bond Screening Committee requires a showing of "public benefit" to proceed with CFD formation and ultimate sale of bonds. The major infrastructure proposed to be financed are cost-advanced by the property owner through the CFD is as follows:

- Off-site sewer transmission line
- On-site sewer trunk line sized to accommodate the Town of Newcastle's existing sewer capacity at such time as Newcastle elects to connect to the system.
- Bickford Ranch Park
- A portion of the off-site water system
- The construction of an on-site fire station
- Providing a portion of the equipment for the fire station.

CFD Questions/Requests:

1) What specific benefit does the off site sewer transmission line provide for the residents of placer county. I85-125

2) Why is the sewer pipe sizing (on site) being up-graded to provide for future needs of Newcastle. I85-126

3) Bickford Ranch Park is sized to primarily accomodate the new residents of Bickford Ranch, & considering the relatively small number of lots which would likely be suitable for equine, a seemingly disproportional amout of space is dedicated for equine use. I85-127

4) The portion of the offsite water water system which will serve Bickford Ranch, according to PCWA, will have minimal excess capacity. How then, does it benefit the residents of Placer County? I85-128

5) How does the on site fire station benefit the current residents of Placer County, considering the increased needs for fire, police, county health & welfare I85-129

(OVER)

services? Does the <u>increase</u> in services required of the County seem offset by the new fire station (only partially equipped!)? If so, please detail how this can be in both categories of benefits & financially.

Additional Parks & Recreation Comments

i) The applicant proposes to change development standards for openspace & sensitive habitat ares to exclude bicycles from these areas. ~~Will the applicant~~ How does this change benefit the general public? If not, why will it be allowed. I85-130

This page intentionally left blank.

RESPONSE TO COMMENT LETTER I85

Response I85-1: The project does not propose access to Clark Tunnel Road to the south. Alternative 5 in the DEIR addresses the impacts associated with access via Clark Tunnel Road (see Section 16.1).

Response I85-2: The project has incorporated "rural" features into its design to comply with the *Placer General Plan* (1994) and *Placer County Rural Design Guidelines* (1997). Refer to Response I4-322 which describes these features, and discusses the project as it relates to the General Plan's policy of "maintain[ing] the rural. . . character of the County." As noted on page 3-15 of the DEIR, the Applicant proposes closure of Clark Tunnel Road at the southern boundary of the project site. If approved, vehicles from Bickford Ranch would not have access to Clark Tunnel Road leading into the Penryn community. Alternative 5 analyzed in Chapter 16 of the DEIR discusses the impacts of continued use of Clark Tunnel Road under three scenarios. All three scenarios result in an increase in traffic on this road and require substantial improvements due to safety issues. Per this analysis Clark Tunnel Road would operate at an acceptable level of service under all three scenarios.

Response I85-3: Comment noted. The Applicant proposes to close Clark Tunnel Road at both the north and south entrances to the project site. Some portions internal to the project would be abandoned and other parts would be converted to Bickford Ranch Road or a pedestrian path in Tower Park.

Response I85-4: Because of the current alignment of Clark Tunnel Road to the south, it is infeasible to widen the roadway. Alternative 5 in the DEIR did not consider widening of Clark Tunnel Road south of the project boundary.

Response I85-5: See Responses I85-4 and I4-68. No improvements are proposed, so no funding is necessary.

Response I85-6: See Response I85-4. No improvements are proposed, so there is no construction schedule.

Response I85-7: See Response I85-4. No improvements are proposed, so no additional right-of-way is required.

Response I85-8: See Response I85-4. No improvements are proposed, so no plans are necessary.

Response I85-9: See Response I56-11.

Response I85-10: Section 16.1 of the DEIR includes Alternative 5, which includes sub-alternatives with varying access via Clark Tunnel Road. The analysis does not identify significant impacts at the intersections listed by the commentors. Therefore, no improvements are proposed as part of the Alternative.

Response I85-11: See Master Responses GW-1 and GW-2.

Response I85-12: See Response I4-99.

Response I85-13: See Master Responses GW-1 and GW-2.

Response I85-14: See Master Responses GW-1, GW-2, GW-3, and SWQ-1, and Response I85-16. The Summary Table on page 2-23 of the DEIR refers to Impact HW-4, which deals specifically with potential groundwater contamination at the former Bickford Ranch headquarters area, which is not a part of the proposed project. This is discussed on page 11-8 of the DEIR. The DEIR preparers would agree that if

this mitigation measure were purported to be the sole mitigation for potential groundwater impacts caused by the proposed project, it would indeed be ludicrous. The aforementioned Master Responses summarize the mitigation measures for potential impacts to groundwater quality identified in the DEIR.

Response I85-15: For reasons described in Master Response GW-5, no testing of surrounding wells will be conducted.

Response I85-16: As discussed in Master Response GW-1, the golf course Chemical Application and Management Plan and Water Quality Monitoring Plan (CHAMP) requires semiannual sampling of surface and groundwater and annual reporting to the County and the RWQCB. More frequent monitoring and immediate reporting to those agencies is required in the event that specific action levels are exceeded. The RWQCB is empowered by the California Code of Regulations to require additional assessment by a professional environmental consultant and remediation of groundwater contamination that may be indicated by the monitoring program mandated by the CHAMP.

Furthermore, the detection of any pollutant in groundwater above the water quality criteria set forth by the State of California, either within or surrounding the proposed project is required by law to be reported to the RWQCB. As stated above, it is the responsibility of the RWQCB to determine the source of the contaminant, the responsible party, and to provide the necessary enforcement actions necessary to ensure that groundwater remediation is performed by the responsible party.

Response I85-17: The Applicant will not establish an escrow account for unknown potential future costs associated with speculative future contamination. The DEIR identifies several mitigation measures for preventing contamination of surrounding water wells, as described in Master Responses GW-1, GW-2, and SWQ-1. See also Response I85-16.

Response I85-18: The Applicant will not be required to obtain and maintain an insurance policy as mitigation requirement. See Response I85-17.

Response I85-19: Two sets of criteria, or action levels in response to groundwater monitoring results have been established for the proposed project. These action levels are discussed in Master Response GW-5. These criteria are established based upon criteria set by the Central Valley Regional Water Quality Control Board in the Water Quality Control Plan (Basin Plan) (RWQCB, 1991). Procedural guidelines for the assessment and remediation of groundwater contamination are also set and enforced by the RWQCB as described in Master Response GW-5. See also Response I85-16.

Response I85-20: The County retained Dames & Moore in part because of their expertise in geology, geotechnology and hydrogeology. Technically qualified registered engineers and geologists evaluated the issue of environmental contamination of groundwater, and the data considered in the conclusions presented are explained on pages 12-16 through 12-18 of the DEIR. It was concluded that mitigation measures identified in the DEIR, particularly Mitigation Measure HW-F, would adequately reduce these impacts to a less than significant level.

The DEIR was reviewed by the State Department of Toxic Substances Control, whose sole concern expressed in Comment Letter A13 was that mine tailings be tested to confirm the conclusions regarding toxicity reached in the DEIR (see Master Response HZ-1). The DEIR was also reviewed by and discussed with the Regional Water Quality Control Board and the Placer County Department of Environmental Health (DEH). Several meetings were held with DEH staff to review the information included and conclusions reached in the DEIR. The County has concluded that another opinion by another specialist is not warranted.

Response I85-21: See Master Response GW-4.

Response I85-22: The total detention/retention basin build-out capacity of 108 acre-feet would be utilized for short time periods, if at all, and not on a continuous basis, as the comment implies. The detention basins would operate as flow-through structures during most of the runoff season. Build-up of sediment within the basins would retard infiltration to groundwater.

Response I85-23: The Applicant proposes to irrigate a 308-acre golf course and estimates that to do so would require about 2 million gallons of water per day. This would be equivalent to about ¼ inch of water per day of irrigation. To irrigate every day for 365 days (1 year), the equivalent amount of precipitation over an area of 313 acres would be about 86 inches. However, standard practice is to irrigate only during the dry season, during which turf grass requires, on average, about ¼ inch per day to remain green. If the dry season runs from April 15 to October 15, irrigation would amount to approximately 43 inches per year.

Response I85-24: At an application rate of about ¼ inch per day, there would be no runoff from the golf course because the water would be consumed by evaporation, evapotranspiration, and root zone wetting. Therefore, no water from the golf course would flow in the ravines. Historically, the ravines have wet season flow only. Therefore, the ravine detention ponds will be dry during the dry season. During the wet season, the ravine detention ponds will normally be empty and will fill when the rate of runoff exceeds the rate at which water flows from the detention pond. As the runoff rate diminishes, the pond will draw down until it is empty. Detention ponds that operate in this fashion are commonly called "dry detention" because they do not have a permanent or seasonal pool of water. Sometimes detention ponds are designed to have a permanent or seasonal pool; in this case they are referred to as wet detention ponds.

Response I85-25: Some of the water used to irrigate turf grass would evaporate into the atmosphere, most would be consumed by the turf grass and released into the atmosphere by evapotranspiration, and a small fraction would be resident in moist soil. No runoff would be expected.

Response I85-26: The Preliminary Hydrology Report (Civil Solutions, 1999) included in Volume IV of the DEIR identifies the runoff and detention ponds necessary to meet Placer County Flood Control and Water Conservation District standards. Final engineering design of these facilities will not be completed until after tentative map approval. Prior to the approval of each final map, the County will require approval of the drainage plans for the areas included on the final map to ensure that the post-project runoff volume is less than the pre-project runoff volume. Facilities will be constructed as they are needed based on the phasing of project construction.

Response I85-27: The presence of seasonal springs along some slopes of Boulder Ridge is discussed in Section 12.1.2 of the DEIR. The source of the spring water is most likely due to infiltration through localized fissures in the Mehrten formation. The origin of the infiltration is not necessarily through the cap rock as suggested in the comment. In fissure or fracture flow systems, determination of the water supply to any one fracture depends on a great number of factors, and the source can be miles from any one given point. The presence of the springs only suggests termination of the fissures, or a geologic contact with a different rock material which is less permeable. In either event, the presence of the springs is an indication that recharge of groundwater supplies by infiltration of local precipitation is rejected or retarded by the geologic conditions at higher elevations of the site.

Response I85-28: See Master Response GW-3.

Response I85-29: See Response I85-16.

Response I85-30: As described in Master Response GW-1, Mitigation Measure HW-F will be revised to require a minimum of eight monitoring wells. See also Master Response GW-5.

Response I85-31: See Comment Letter A7, Comment A7-9, from PCWA. The water line will be sized to have the capacity to deliver domestic water to the community. See also Master Comment WS-1, No. 1, No. 2, and No. 6 regarding available water supply.

Response I85-32: Placer County has no designation of "heritage" trees. However, the Placer County Tree Preservation Ordinance protects any "tree" that is defined as "a tall woody plant native to California, with a single main stem or trunk at least 6"dbh [diameter at breast height], or a multiple trunk with an aggregate of at least 10" dbh." "Digger" pines (*Pinus sabiniana*) are exempt from the ordinance. The ordinance also protects all trees in riparian areas regardless of size and trees designated as "landmark trees" by resolution of the Board of Supervisors. Trees protected under this ordinance may be removed, but a tree permit and mitigation for the lost tree are required. See Master Response B-7 for a description of the mitigation requirements for removal of trees protected under the ordinance.

Response I85-33: See Response I4-133 regarding habitat fragmentation on site and around the site. Also note that Appendix C of the General Plan designated the Bickford Ranch area for development. See Master Responses B-17 and GP-3 for a discussion of Appendix C and other General Plan policies.

Response I85-34: The Bickford Ranch site currently provides movement corridors within the site, but wildlife movement through the site and the surrounding region is limited (see Responses I4-133 and I4-385). Development of the site will further reduce wildlife movement on-site (see Response I48-7).

Response I85-35: Portions of the Bickford Ranch site would be considered significant ecological resource areas as listed under General Plan Policy 6.C.1., including vernal pools, intermittent streams, blue oak woodland, and riparian areas. These resources are identified and discussed in the DEIR (see pages 13-2 through 13-23). Significant impacts to these resources are evaluated in the impacts section of the DEIR (see pages 13-28 through 13-41) and mitigation to reduce the significance of the impacts, as possible, is provided in the mitigation section (pages 13-48 through 13-57). Policy 6.C.1 is addressed on page 13-44, which refers to the rest of Chapter 13. Also see Master Response B-17 for a discussion of the interpretation of General Plan policies for this project.

Response I85-36: See Master Response B-10.

Response I85-37: The Placer County Tree Preservation Ordinance is available at the Placer County Planning Department.

Response I85-38: See Response I4-211.

Response I85-39: See Response I85-32.

Response I85-40: The water supply pipeline referred to on page 13-23 is the off-site potable water pipeline connecting to existing PCWA potable water distribution pipelines. It is not an irrigation canal pipeline.

Response I85-41: The proposed oak planting areas are indicated in Figure 7.5 on page 7-13 of Appendix A3 (Draft Bickford Ranch Specific Plan) in Volume II of the DEIR. A more specific planting plan has been added as Figure B7-1 of this FEIR. See also Master Response B-10 for a discussion of the existing and proposed tree densities in the tree planting areas.

Response I85-42: See Master Response B-10 for discussion of the tree planting densities and tree survival goals.

Response I85-43: The commentors are correct in stating that oak trees on the site are a development constraint. The proposed project has been designed to avoid the majority of oaks on the site, and in particular most of the dense, healthy oak woodlands occurring on the slopes of the ridges. Also see Master Response B-6 regarding the significant unavoidable impact on oaks and Master Response GP-3 regarding planned development of the Bickford Ranch site.

Response I85-44: See Response I4-217.

Response I85-45: See Master Response B-6.

Response I85-46: See Master Responses GP-1 and GP-4. Development density and site constraints pertaining to protected oak trees and required open space are discussed in Chapter 4 (Land Use) and Chapter 13 (Biology) of the DEIR.

Response I85-47: Each of the project components have been evaluated for consistency with applicable Placer County General Plan policies and Appendix C Development Standards. All known project inconsistencies are identified in Chapter 4 of the DEIR. Project impacts, and their level of significance, are discussed in the appropriate DEIR chapters for each subject area—specifically, Chapters 7 and 13 contain the policy discussions of roadway levels of service (page 7-35), setbacks (page 13-42), protection of large natural habitat and wetland areas (page 13-43), and tree removal (page 13-46). The following are supplemental responses to issues raised by the commentors.

- Refer to Responses I4-12, I30-1 and I33-45 (buffer zones).

- If the project is approved, as proposed, and the Development Standards are adopted, the County's setback requirements under the current zoning would be superseded by the minimum setback requirements established in the Development Standards.

- No construction is proposed within the 50-foot setback of any wetland. Wetland enhancement work will be performed up to a 10-foot setback, but this is not considered "construction." All wetland enhancement work will be completed in compliance with U.S. Army Corps of Engineers Permit 26. This will be clarified in Section 8.7.8 of the Applicant's Development Standards by deleting the reference to a 10-foot setback.

- The Specific Plan will limit construction of secondary residential units to lots greater than one acre. See Response I2-4.

- Refer to Response I4-311 (development on slopes). The Placer County General Plan has no land use designation of Open Space on the project site. Appendix C Development Standards include an open space requirement. Open space areas are designated as shown on Figure 3-3 of the DEIR and have been included in the various analyses elsewhere in the document.

- There is no restriction on the number of residential communities that may be developed—the Applicant proposes three. The commentors may be referring to the provision in Appendix C which allows for the development of "up to two mixed use, pedestrian-oriented villages." Two "villages" have been proposed—one is located on Bickford Ranch Road at Lower Ranch Road; the second is located within the Heritage Ridge development.

Response I85-48: Placer County Planning Commission and Board of Supervisors will consider staff recommendations and public input, along with the EIR mitigations (proposed and recommended), during

hearing(s) on the Bickford Ranch Specific Plan. If the Specific Plan is adopted (with or without revisions), it will be considered a legislative action. Therefore, future implementation (i.e., physical development) of the Plan must be legally carried out in accordance with its Development Standards. Other requirements placed on the project would be spelled out in the Final EIR Mitigation Monitoring and Reporting Program. Subsequent projects which implement the Specific Plan (e.g., Tentative Maps, use permits, etc.) will require a public hearing and approval by the appropriate hearing body (e.g., Planning Commission, Board of Supervisors, etc.) and would contain specific implementing conditions.

Response I85-49: As mentioned in Response I85-48, Placer County hearing bodies will consider staff recommendations and public input, along with the EIR mitigations (proposed and recommended) for the project, during the public hearing on adoption of the Bickford Ranch Specific Plan—this includes consideration of proposed development along the canal corridors and slopes of Boulder Ridge. The Specific Plan, if adopted, is required to be consistent with the Placer County General Plan, including Appendix C.

Response I85-50: All known project inconsistencies with the Placer County General Plan and Appendix C are discussed in Chapters 4 through 13 of the DEIR. The identified inconsistencies, along with recommended measures to ensure project consistency with the General Plan, will be reviewed and considered at the public hearing.

Response I85-51: See Responses I85-49 and I85-50. See also Master Response GP-3, which discusses the General Plan's balancing the competing interests of preservation and growth.

Response I85-52: Consistent with State law, a project Applicant may apply to the County for an amendment to a specific plan, including the development standards. Any action taken to amend the Bickford Ranch Specific Plan will be subject to public hearings and approval by the Planning Commission and Board of Supervisors.

Response I85-53: See Response I4-267 regarding the County's interpretation of the General Plan with respect to visual and scenic resources policies, and the specific issue of structures silhouetting against the sky (skylining). See Master Responses GP-3 and GP-4 for a discussion of the relationship between General Plan policies and the development standards for the Bickford Ranch Specific Plan area identified in Appendix C of the General Plan.

Response I85-54: See Responses I4-271 and I4-272.

Response I85-55: The Placer County Planning Department and the Placer County Department of Public Works have permit approval authority prior to construction. Either one of these departments could be contacted regarding premature construction on the lots.

Response I85-56: Planting palettes are presented based on landform zones and are illustrated on Figure 1.2b, Plant Zones, in the Bickford Ranch Design Guidelines, Appendix A5 (Volume II of the DEIR). In addition, "lots with visual restrictions will be prevented from planting of non-native vegetation and tree species that would grow to a height greater than 120% of the normal oak tree canopy height" (Bickford Ranch Development Standards, Appendix A4).

Response I85-57: Visual screening and sight line buffering would be completed using both native and non-native species. Native evergreen species may include the native interior live oak and canyon life oak. These species of oak are known to be moderate to slow growing. To accelerate the establishment of screen plantings, exotic species may be interplanted within the oak planting to achieve the desired impacts from tree planting. As the desirable species (live oaks) become established and of size, the nursery crop plants will be selectively removed to provide a transition to the final desired species composition.

Both evergreen and deciduous trees would be used in the planting program at Bickford Ranch. The native blue oak would be a primary species for tree planting for two main reasons. First, the proposed project would be planting more than 22,000 oak trees for mitigation and to establish younger age classes within the existing oak woodland. Approximately 67 percent of the total planting will be blue oak trees. Second, the blue oak is the dominant native tree on the property and in the surrounding area. It would be heavily planted along the access roads and in areas where the native look is desirable. The rounded crown form and overall medium size visually blends with general character of the foothill region and the open space areas that would remain following project completion. Other species of trees and large scale or tree-like shrubs would reflect this character. Tall pointed crown trees such as canary island pine, ponderosa pine and Douglas fir would not be used except for possible accent purposes.

Trees under consideration by the Applicant for landscape and screening purposes include selected acacia, selected eucalyptus, ash, honey locust, stone pine, aleppo pine, English laurel, Chinese elm, hackberry, mulberry, Chinese pistache, Carolina cherry, holly oak, pin oak and cork oak. Some tree-like shrubs may readily reach 20 or more feet in height. In the landscape, shrubs of this scale often function as trees. Large-scale shrub species being considered include bay laurel, Japanese privet, laurel, and photinia.

The final plant palette would include species from the above list plus others that are identified as desirable based on overall landscape characteristics and intended planting location as determined in the final landscape plans.

Response I85-58: See Response A7-12. Compliance with County policies is achieved if the proposed project does not to break the skyline with "structures" that would be visible from roadways and surrounding residential properties. The water tank will be subject to the same restrictions that other structures are subject to from a visual perspective.

Response I85-59: An analysis of consistency with "specific development standards" contained in Appendix C is found on pages 4-10 through 4-15 of the DEIR. Proposed open space areas on slopes, drainage ways and corridors are shown on Figure 3-3 of the DEIR. See also Responses I47-2 and I3-18.

Response I85-60: See Responses I4-311 and I85-59.

Response I85-61: Appendix C Development Standard (c) requires that any development "set aside significant open space areas and include corridors along canals." While canal corridors (as well as slopes along Boulder Ridge, drainage ways, and major roadways) are areas intended for open space, Appendix C does not suggest that they be reserved exclusively for open space (i.e., Appendix C does not prohibit development from occurring along canal corridors). See Master Responses GP-3 and GP-4 for discussions on how the project's consistency with policies will be evaluated within the context of development intended by the General Plan and Appendix C.

Response I85-62: See Responses I4-311 and I85-61.

Response I85-63: See Master Responses B-12 and B-14 and Responses I85-74 and I85-75.

Response I85-64: Ownership of open space is identified on Revised Table 6-6 in Master Response PR-1. This table identifies that 476.8 acres of public natural open space and 52.1 acres of public open space corridors are proposed to be dedicated to the County.

Public open space represents 27 percent of the site. It has not yet been determined whether or not the County will accept the open space. See Response I93-65. Please note that the Applicant's plans identify both natural open space and open space associated with certain outdoor recreational elements of the proposed project, such as the golf course and parks. The DEIR clearly makes this distinction in the

discussion of the Open Space and Recreation Element on pages 3-7 through 3-10 of the Project Description (Chapter 3) and on the Revised Table 6-6.

Response I85-65: See Responses I85-64 and I93-65.

Response I85-66: The commentors' phrase "violate the 1994 General Plan" is understood by the EIR preparer to mean "inconsistent with the General Plan" as intended under CEQA. The project's inconsistency with General Plan is discussed in Chapter 4 of the DEIR. See Master Responses GP-3 and GP-4 for discussions on how the project's consistency with policies will be evaluated within the context of development intended by the General Plan and Appendix C.

Response I85-67: The word "shall" is intended as mandatory rather than permissive. Refer to Master Response GP-3, paragraph 2, which discusses the inherent flexibility in some General Plan policies containing this directive.

Response I85-68: The proposed mitigation measures for open space preservation are described in Chapter 4 (Land Use Mitigation Measure L-A) and Chapter 13 (Biology Mitigation Measure B-Q) of the DEIR.

Response I85-69: The commentors' opinion regarding open space is noted. For clarification purposes, in the absence of a specific plan, the project site is specified in the General Plan for land uses permitted under the Rural Residential and Agricultural Timberland designations. There is no General Plan land use designation of Open Space on the site. It is assumed the open space requirement the commentors are referring to is that required in the implementation of a specific plan for the project site as described in Appendix C, section (c). No specific open space acreage requirement is contained within the Appendix C Development Standards. The proposed open space component of the Bickford Ranch Specific Plan is described on page 4-11 of the DEIR.

Response I85-70: See Responses I85-49, I85-66, and I85-68.

Response I85-71: See Master Responses B-12 and B-17.

Response I85-72: See Master Responses B-12 and B-17.

Response I85-73: See Master Response B-12.

Response I85-74: The commentors are referred to Figure 3-8 in the DEIR, which identifies a direct impact on intermittent drainage 16 at the proposed golf cart path crossing, and identifies a buffer area between the drainage and the fairway for hole #14. The impact on the drainage is included in the total acreage of impact to waters of the United States. This impact acreage is included in the Section 404 permit received from the U.S. Army Corps of Engineers to fill waters of the United States and will be mitigated on site, as described in Mitigation Measure B-E. Protection of adjacent wetland and riparian areas during construction is provided in Mitigation Measures B-F, B-P, G-B, and H-D. As noted in Chapter 2 (Plan Modifications), hole #14 has been reconfigured and now includes a 50-foot setback from the wetland.

See Response I11-2 for information regarding the Indian grinding rock resource.

Response I85-75: The General Plan prohibits construction within 50 feet of any wetland. The proposed project does not propose construction within 50 feet of any wetland (golf course hole #14 has been reconfigured to allow a 50-foot buffer). Section 8.7.8 of the Applicant's Development Standards is meant to address wetland enhancement activity that may occur consistent with requirements under the 404

permit for the property. Such activity would include creation of swales to detain and clean water going to wetlands (biofilters), creation of wetland marsh areas, or creation of lake fringe areas. This will be clarified in the final Specific Plan.

Response I85-76: See Master Responses B-12 and B-17.

Response I85-77: See Responses I3-18, I4-311, I85-49, I85-59, and I85-61.

Response I85-78: See Master Responses B-12 and B-17.

Response I85-79: See Response I85-75.

Response I85-80: See Response I85-61.

Response I85-81: The Placer County Board of Supervisors will consider the recommendations of the Placer County Planning Commission regarding the imposition, or not, of the recommended mitigation measures, during the FEIR certification process. Reasons for rejection of recommended mitigation measures, if any, must be clearly delineated in Board Findings adopted concurrent with FEIR certification. Once adopted, there is no procedural distinction between proposed and recommended mitigation measures; all adopted mitigation measures will be implemented, as identified in the final MMRP.

Response I85-82: Actions to ensure that mitigation measures are carried out as specified are identified in the MMRP included as an attachment to Volume I of the DEIR. As discussed in the MMRP, most mitigation measures are identified with various County permit programs, and must be completed prior to issuance of the relevant permit. For these types of mitigation measures, identified on pages 1 through 4 of the MMRP, the action taken against the Applicant would simply be to withhold the permit until the mitigation measure has been complied with. In the instances of ongoing mitigation and monitoring requirements, identified on pages 5 through 17 of the MMRP, the individual or organization responsible for verifying compliance with the mitigation is identified. Actions that could be taken if mitigation measures are not completed include withdrawal of permits, fines, or legal actions.

Response I85-83: The Placer County Flood Control and Water Conservation District and the Placer County Department of Public Works will review the post-development stormwater management program. The Placer County Department of Environmental Health will review the Golf Course Chemical Application Management Plan and the Applicant's Lake Management Plan. The Placer County Department of Public Works will review the grading and erosion control plan.

Response I85-84: All management plans and/or programs will be public documents.

Response I85-85: There will not be a public review period prior to finalizing management plans and programs, although the performance standards for management plans and programs related to environmental protection are included in this DEIR and have been made available for public review. The responsibility for review and approval of the management plans and programs rests with the appropriate public agencies. Where specific management plans will be used in considering issuance of other permits or approvals for the project (such as a 404 permit from the U.S. Army Corps of Engineers), the plans may be subject to public review if required by such permit programs. The public has provided comments on the information in the DEIR relating to management plans and programs, and ancillary materials related to management plans and programs provided in Volumes II through VI of the DEIR.

Response I85-86: The Homeowner's Association (HOA) will oversee mitigation related to the CC&Rs during the operation phase of the project. The HOA will be responsible for ensuring compliance with

Mitigation Measure B-D. Mitigation Measure B-F will occur during project construction, which will require monitoring by a project biologist. The project biologist will report to Placer County and appropriate resource agencies, such as CDFG and USFWS. The enforcement of components of the open space plan (Mitigation Measure B-Q) will include CDFG, Placer County, and possibly other resource agencies. Specific lines of responsibility will be identified in the final open space plan.

Response I85-87: Biological resources with proposed off-site mitigation include oak trees, vernal pools, vernal pool fairy shrimp, and valley elderberry longhorn beetle. Off-site oak tree mitigation is allowed under the Placer County tree ordinance where it had been determined that adequate area onsite is not available to accomplish all mitigation plantings. Placer County supports off-site mitigation where very minor impacts are proposed as opposed to larger areas of disturbance, where on-site mitigation would be preferred. The USFWS outlines requirements for off-site vernal pool fairy shrimp and valley elderberry longhorn beetle habitat mitigation in programmatic biological opinions for those species (USFWS, 1995; 1996; 1999). Mitigation Measures B-C (Implement off-site tree mitigation) on pages 13-49 of the DEIR, B-H (Compensate for loss of vernal pool fairy shrimp habitat) on pages 13-52 and 13-53, and B-J (Compensate for loss of VELB habitat (elderberry shrubs)) on pages 13-53 and 13-54 follow requirements for off-site mitigation outlined in the tree ordinance and the biological opinions.

One of the primary ecological benefits of off-site mitigation for biological resources is the opportunity to provide the affected species with a larger habitat area and surrounding ecosystem than is available on site. Off-site mitigation for listed species generally involves the use of a mitigation bank, which provides a large enough habitat area to be sustainable over the long term. Preserved habitat areas must be large enough to support a sustainable population of a plant or animal. Small habitat areas that support small populations are vulnerable to extinction because of the limited genetic variation and number of breeding individuals in the population. A large, genetically variable population is more likely to have enough individuals that can survive and repopulate following a catastrophic event, such as above- or below-normal temperatures, drought, and disease. A small population could be decimated by the same event.

Also see Master Response B-10 for a discussion of off-site tree mitigation.

Response I85-88: See Response I85-75.

Response I85-89: By definition, the Bickford Ranch Specific Plan must be found consistent with the Placer County General Plan. The Development Standards, once adopted, may supersede the zoning code. Inconsistencies with the General Plan have been identified in the DEIR. The Applicant is requesting an exception from the Department of Forestry, Chapter 7 – Fire Protection Article 1:1276.01(a), which requires a minimum 30-foot setback for building and accessory buildings from all property lines on lots over one acre and less than two acres in size (see footnote to Table 1.3 – Residential Development Standards, in the Bickford Ranch Development Standards, page 1-3, in Volume II of the DEIR). Placer County does not require a variance where CDF has determined that the project meets the intent of State law. See Response I98-8.

Response I85-90: The Applicant will not be allowed to violate the General Plan, or ordinances or codes. Please refer to Response I85-89.

Response I85-91: A specific plan is used to refine and implement applicable General Plan policies for an area and is required to be consistent with the General Plan. Development standards are developed by the Applicant and were submitted as part of the proposed Bickford Ranch Specific Plan. They have been addressed in the DEIR and will be reviewed and considered, along with the rest of the project, at the publicly-noticed Planning Commission and Board of Supervisors hearings. Recommendations for changes, if any, to these development standards will be presented by the Placer County Planning Department staff at these public hearings.

Response I85-92: The CEQA process is for the purpose of disclosing potential environmental impacts of a particular project or program and suggesting mitigation that will reduce or eliminate those impacts. There is no "public benefit" component to this environmental impact analysis. See Response I27-1.

Response I85-93: See Master Response PR-2.

Response I85-94: The commentors are correct in that all trails proposed by the Project Applicant are not multiple use. Sections 4 and 8 of the Bickford Ranch Specific Plan describe the proposed public pedestrian and bicycle path system. As shown in Figure 8.11, approximately 19 miles of Class II bike lanes are proposed throughout the Plan area, along with pedestrian pathways and equestrian trails. The proposed system will permit pedestrian and bicycle access to and from neighboring communities (via Clark Tunnel Road), and provide potential linkages to future regional trail systems. See Response PR-2.

Response I85-95: See Response I85-48. Specific implementation of Plan features are described in Section 10 of the proposed Specific Plan.

Response I85-96: The EIR preparer has no knowledge of how the Winchester project is being implemented relative to the Final EIR prepared for that project. Implementation of a project trail program is conducted on project-specific basis within Placer County. Specific implementation of Plan features are described in Section 10 of the proposed Specific Plan.

Response I85-97: See Response I86-1 and Master Response PR-2.

Response I85-98: See Revised Figure 3-7 in Chapter 2 of this FEIR and refer to Master Response PR-2 for a discussion of the revised project trail system. Any additional changes to the configuration of the project trail system would be identified through the public hearing process.

Response I85-99: A substantial portion of Clark Tunnel Road within the project site (east of the approximate entrance to the proposed Heritage Ridge Community) would be improved and renamed Bickford Ranch Road, and would no longer retain its current gravel condition. Class II bike lanes would be constructed on Bickford Ranch Road, as described on pages 3-14 and 3-15 of the DEIR, and as depicted on Revised Figure 3-7 in Chapter 2 of this FEIR. See Master Response DEIR-3 regarding approval of the Applicant's proposal to close Clark Tunnel Road to the north. See also Master Response PR-2 showing the revised project trail system. Clark Tunnel Road both north and south of the project site would connect to Bickford Ranch bike lanes.

Response I85-100: The Applicant has provided a multi-purpose trail connection from Bickford Ranch Road to SR 193 via Clark Tunnel Road, as described in Chapter 2 of the FEIR and shown on Revised Figure 3-11, Modified Equestrian, Pedestrian, Wilderness, and Bicycle Trail Systems. This connection will accommodate bicycles. This connection is also provided to Clark Tunnel Road south of the project area. The County has not taken a position on staff's recommendation that Clark Tunnel Road, north of the project, be improved to a County standard.

Response I85-101: See Master Response PR-2.

Response I85-102: The DEIR evaluated the project trail system as proposed by the Applicant. Erosion associated with the equestrian trail system as originally proposed was not identified as an impact. This FEIR identifies erosion of the currently proposed wilderness trail as a potentially significant impact before mitigation, because of the topography associated with the new trail system. Mitigation is proposed to mitigate this impact to a less than significant level as described in Master Response PR-2.

Response I85-103: Fence construction details have not been finalized. Perimeter fencing will be constructed to be visually open as depicted on Figure 14.4 of the Applicant's Design Guidelines. The fencing around the site boundaries would be 3-strand wire with metal post fencing, similar to what currently exists on this property and much of the surrounding properties. Most animals would be able to pass freely under, through, or over this type of fencing. The view fencing depicted in Figure 14.5 of the Applicant's Design Guidelines is intended to provide security for the Heritage Ridge residential area in places where it abuts the golf course. The golf course would not be entirely fenced with view fencing and thus would allow animal passage at night, although not likely into the small lot residential units in Heritage Ridge. See also Chapter 2 of this FEIR regarding the Applicant's current plan for perimeter fencing, and Response I68-10.

Response I85-104: Page 4-12, paragraph I of the *Bickford Ranch Specific Plan* (1999) states that "[t]he golf course and driving range will be. . . available initially to the public; however, the Heritage Ridge Homeowners Association may eventually restrict public access." See Master Response DEIR-3 regarding the approval process, and Response I2-8 regarding the project's inconsistency with General Plan policy on gated communities.

Response I85-105: Tower Park would occupy an area of 3.7 acres in the uppermost portion of the Clover Valley Creek watershed. Water would drain through the park because it is located in a valley. Bickford Ranch Road borders the western side of the park. To construct the road, fill would be placed at the base of the valley and a culvert would be constructed so that water flowing through the park can pass to the downstream side of Bickford Ranch Road. During a 100-year flood, water would accumulate behind the road fill and would reach a maximum depth of about 8 feet, at which time an area of about 20,370 square feet (0.46 acre) would be covered with water. During this infrequent event, about 12 percent of the park's area would be temporarily flooded. Use of natural features as temporary detention basins during flood events is a desirable condition. See the Preliminary Hydrology Report, dated July 15, 1999 (Civil Solutions, 1999, in Appendix H, Volume IV).

The golf course and the Heritage Ridge Recreational Center would serve the residents of the Heritage Ridge community, and are located within and central to this community. The site's topographic features somewhat separate the eastern portion of the Heritage Ridge community from the eastern Ridges communities, although Heritage Ridge residents could use the facilities at Tower Park.

Response I85-106: Night lighting will be prohibited at the driving range. This is proposed by the Applicant and will be incorporated into the project CC&Rs.

Response I85-107: See Response I32-3 and page 7-13 of the DEIR for information concerning construction access. Clark Tunnel Road will not be permitted for use for construction access. This will be specifically included in the project's conditions of approval. The Mitigation Monitoring and Reporting Plan attached to Volume I of the DEIR identifies who is responsible for implementing and who is responsible for monitoring compliance with the mitigation measures. The mitigation measures would be included in the contractor specifications. The usual procedure for violation of specifications is correction of the violation, mitigation of any adverse impacts, and possibly a fine.

Response I85-108: The commentors are correct in stating that poplar roots can be invasive around sewer pipelines. The poplars will be replaced in the planting mix with California sycamore, another fast-growing species that would be appropriate for the planned use. The final Mitigation and Monitoring Plan for the project will include a revised mix of street trees using an 80:20 ratio of California sycamore:native oaks. The oaks are generally slower growing, but would be long-lived trees appropriate to the native landscape of the region. The greenbelts would either be dedicated to the County and maintenance would be funded through a CSA formed for Bickford Ranch, or they would be retained by the Applicant and maintained by the HOA.

Response I85-109: A traffic signal has been assumed at this location by the year 2010. It is included as part of the overall Sierra College Boulevard improvements. The exact date of implementation of the traffic signal is unknown at this time. See also Master Response T-1.

Response I85-110: Improvements at the intersection of Sierra College Boulevard and SR 193 include the installation of a traffic signal, and widening of Sierra College Boulevard. There is currently no definitive schedule of when these improvements would be implemented, although the DEIR identifies that the intersection would be signalized by 2010 (page 7-12 of the DEIR). See also Master Response T-1.

Response I85-111: See Master Response T-1.

Response I85-112: See Master Response T-1.

Response I85-113: See Master Response T-1.

Response I85-114: The only improvements proposed to Sierra College Boulevard by the Applicant are the entrances to Bickford Ranch Park. The east side of Sierra College Boulevard adjacent to the proposed project currently includes Class II bike lanes. Alternative 7 analyzes the impacts of adding a third lane on Sierra College Boulevard. The precise improvements that would be included in this Alternative are not certain at this time. However, it is currently expected that paved shoulders/bicycle lanes would be included. See also Master Response T-1.

Response I85-115: No changes in the current configuration of SR 193 are planned in conjunction with construction of the sewer pipeline, which is proposed to follow the right-of-way of a temporary detour constructed by Caltrans, and which is planned to be revegetated following construction.

Response I85-116: The Transportation and Circulation chapter of the DEIR provides a summary of the analysis that was performed to identify significant traffic impacts associated with the proposed project. At the beginning of Section 7.3 (on page 7-8), the standards for significance are summarized. Many of these standards relate to the resulting level of service that could be expected after construction of the proposed project. The concept of level of service is described at the beginning of Chapter 7 (Transportation and Circulation), and easy reference charts are provided on pages 7-3 and 7-4.

In the impact section of Chapter 7, tables are provided which clearly show the "before" and "after" conditions for traffic at the study area roadways and intersections. The impacts are discussed in more detail for each of the affected roadways and intersections where an impact would result, and feasible mitigation is identified to reduce the level of impact. An even more truncated summary can be found in Table 2-2 in the Executive Summary.

The DEIR provides and understandable discussion of the transportation and circulation impacts of the proposed project in accordance with the requirements of CEQA. It also provides some detail to allow the reader to understand the assumptions and analysis that led to the conclusions regarding significance. More detailed traffic data are included in Appendices VII and VIII.

Response I85-117: The traffic analysis in the DEIR did not assume that a traffic light would be installed at Del Mar because traffic signal warrants were not met. Improvements to English Colony Road are identified in Mitigation Measure T-H on page 7-39 of the DEIR. Additional information regarding conditions on English Colony Road can be found in Master Responses T-5 and T-6.

Response I85-118: See Response I16-11.

Response I85-119: Properties within the boundaries of the service area of the new Fire Station would pay supplemental tax assessments. The supplemental tax rate would depend on which fire district(s) serve the area.

Response I85-120: The fire station would be fully staffed and functional by the completion of Phase 1.

Response I85-121: Fire hydrants would be placed along roadways in accordance with Placer County, PCWA and Fire Department requirements. Access points are for allowing major fire fighting equipment such as bulldozers and fire trucks access to fires.

Vehicle access lanes would be recorded on the final maps for the project. In addition, the CC&Rs would indicate where these easements exist and would include restrictions on blocking access. Each homeowner would be given a copy of the CC&Rs. These lanes would be posted with "No Parking" signs. The emergency vehicle access easements that are located in the open space areas would be owned by the County and maintained through a CSA, or owned by the HOA and maintained by them. The maintenance costs for the CSA would be paid for by the Bickford Ranch property owners.

Response I85-122: The project would be served by not only an on-ground fire service but also by CDF for wildland fires. Therefore, for fires that occur in open space/slope areas, fire hoses would not be used. Rather, CDF's general practice would be to fly tankers over the site, dropping water and fire retardant. The intervals between fire access points are be established by CDF based on its expertise in accessing structures in wildland-type terrain. See Response C3-1 and Figure C3-2 for more information regarding open space fire access.

Response I85-123: Fire vehicle access lanes would be located within the open space to assist in both structural and wildland fires. The locations of these access lanes are determined in consultation with CDF. See Response C3-1 and Figure C3-2 for more information regarding open space fire access.

Response I85-124: Approval or denial of the Bickford Ranch Specific Plan will be determined by the Board of Supervisors at the conclusion of public hearing(s). See Response I4-311 regarding development on ridgelines and steep slopes. Also see Responses I3-18, I85-49, I85-59, and I85-61.

Response I85-125: The off-site sewer transmission line can provide for the collection and transmission of sewage from the surrounding areas of Auburn, South Placer Municipal Utility District, and the Newcastle Sanitary District to a regional treatment facility, if it becomes available.

Response I85-126: The on-site sewer pipe may be sized to provide the capability to transmit sewage from Newcastle to the Regional Treatment Facility, if it becomes available in the future.

Response I85-127: An equestrian arena is no longer proposed. The equestrian trail and staging area would be a public facility that could be used by equestrians within the Bickford Ranch Specific Plan area or by others. There is no presumption that it is sized to primarily accommodate the new residents of Bickford Ranch. As stated on page 6-25 of the DEIR, "the equestrian [features] appear to be in high demand by residents in nearby areas, based on the number of stables and equestrian facilities described in the South Placer County Park and Recreation study." See also Master Response PR-1, including Revised Tables 6-6 and 6-7. Bickford Ranch Park has been increased in size to 56.8 acres and contains additional recreational facilities.

Response I85-128: The portion of the off-site water system that would serve Bickford Ranch will provide for increased fire support in the area as well as for the increased availability of potable water.

Response I85-129: Bickford Ranch residents would be assessed a supplemental property tax to offset the costs associated with the fire station. The fee would be established by the Fire District that ultimately serves the site. The reason the Applicant would only "partially equip" the fire station is because CDF has some existing equipment on hand for partial outfitting already. The Applicant would provide the remaining portion of equipment to fully outfit the station.

The on-site fire station would benefit the current residents of Placer County through mutual aid agreements. The station could provide additional fire suppression services beyond those provided by a local station, if necessary.

Response I85-130: Development standards for this project are outlined in Appendix C of the General Plan. See Response I53-2 regarding bicyclists in open space areas as described in Appendix C. The development standards of Appendix C specifically address sensitive habitats as part of required buffer areas. These buffer areas are further delineated in Part I, pages 22 and 24 of the General Plan. These standards allow, but do not require, bicycle paths among other uses within these buffers. The Applicant does not propose to change the General Plan buffer standards or the development standards regarding bicyclists in sensitive habitat areas.

This page intentionally left blank.

Bickford DEIR Comment: Bickford Ranch Multi-use Trail Proposal

Proposal by Wesley Dill
7095 Allen Lane, Penryn CA 95663

The following trail proposal was designed to meet the recreational goals of both Placer County and the Placer Legacy Committee's defined recreational objectives for Placer County, which are: I86-1

1. Create and provide access to interconnected system of trails throughout the county.
2. Create diverse recreation opportunities in the county to fulfill unmet needs. Create something different than the active recreation currently provided by the cities.
3. Create parks in the County that provide opportunities for camping, outdoor education and other passive recreation for all residents.
4. Create a diversity of parks that showcase natural features across the landscape of Placer County.
5. Create more passive recreation opportunities for people from the cities. (Residents should be able to jump on a bus with their bike and have quick access to open space recreation.)
6. Encourage the creation of more open space for public recreation purposes.
7. Alter existing development guidelines for unincorporated lands to better incorporate active and passive recreation into residential/community design.
8. Develop an inclusive and collaborative process for regional recreation planning.
9. Where possible retain the existing and historic use of recreation trails.
10. Create a broad-based funding strategy to achieve the objectives outlined above.

Additionally, the multi-use trail proposal is in compliance with and follows the guidelines of the Placer County 1994 general Plan, including the specific development standards for Bickford Ranch in Appendix C of the general plan. **The goals of this specific multi-use trail proposal are as follows:**

1. Develop a multi-use perimeter trail system within the Bickford Ranch Development consistent with the long term objectives of Placer County and the Placer Legacy Committee.
2. Utilize the proposed open space areas for trail routing.
3. Open up the proposed open spaces so citizens can actually access these areas.
4. Route the trail system according to the natural topography and soil geology within the open space areas in order to minimize erosion potential as well as increase the enjoyment of the unique natural setting of the proposed development.
5. Consider safety a priority and avoid mixing equine and bicycle recreational uses where the topography dictates.
6. Provide recreational opportunities for all non-motorized user groups of Placer County.
7. Develop a "loop" trail system for all recreational users.
8. Develop multiple alternative routes allowing future connection of the Bickford Ranch Trail System in any direction with other possible recreational trails/parks of the future as development of Placer County continues.

9. Show consideration for future homeowners of Bickford Ranch in the routing of the trail systems as well as increasing property values through multi-use recreational trails.
10. Utilize the trail system to "showcase" the outstanding views of Boulder Ridge including the Sutter Buttes, Sierra Nevada Mountains, Sacramento Valley, and Coastal Mountains as well as provide access to view and enjoy the local views of the immediate area.

This Bickford Ranch trail proposal routing was developed during fieldwork and is presented in map form with this proposal. Included is a smaller version, as well as a 1'=400' scaled map (presented to John Ramirez only). Location and routing of trails in this proposal would require further fieldwork to record the trail base location with Global Positioning Satellite technology to more accurately delineate trail easements. All trail bases would be established through dedicated trail easements within open space corridors and open space areas, with sufficient easements to allow repair of trail bases as required. A minimum of 30 feet width is recommended for all dedicated trail easements. Alternatively, Placer County may choose to accept all natural open space areas delineated in Appendix C of the 1994 General Plan with trails routed through these public lands.

In addition to the actual trails, attention has been given to ensuring adequate parking for trail access is provided, both in the Bickford Ranch Park area as well as along Bickford Ranch Road, sitting areas along the trail with potable water, waste collection sites/ restroom facilities at the east end of the development, and multiple access points to Bickford Ranch Road which could facilitate help in cases of emergency.

The issue of safety to all user groups is of particular concern, and has been given considerable attention in this proposal. Aside from the inherent risk associated with outdoor activities, the separation of equine and off road mountain bike recreationist has been addressed. The utilization of split equine/mountain bike trails in some areas is primarily due to the steep topography and shallow underlying soils in many of the ridge areas which would preclude the establishment of trail bases permitting shared use in a safe manner. Line of site between user groups is also of importance in deciding on split trail requirements and may require slight modification of the exact routing shown in the accompanying maps.

Construction of this proposed trail system would be provided by the developer and **shall be completed in Phase I** of the development. Maintenance funding of this trail system would be provided by a County Service Area within the Bickford Ranch Development, as well as future Placer County General Funds, when available. Much of the maintenance work could be provided by user group clubs under the supervision of Placer County Parks Department

Any Development Agreement between Placer County and Southwest Bickford Holdings, Inc./U.S. Homes should include this trail system proposal in order to provide some of the

required public benefits pursuant to the inclusion of a development agreement and public assistance in financing the infrastructure in the overall Development Plan for Bickford Ranch.

All Class II bicycle lanes as well as private equine trails shall remain as proposed in the DEIR of August 17, 1999 for Bickford Ranch. All other trail systems would be expanded as diagrammed under this proposal, and Clark Tunnel Road to the north of the proposed Bickford Ranch Development would remain open to bicycles as it currently exist. All trails would be open to pedestrians. Most of the trail bases in the Ridge Communities where a split trail system is desired would require excavation of a 3' base, with clearing of lower branches in some areas, particularly on the equine trails. Construction of the trail bases would include many trail and grade "brakes" to minimize erosion. Construction should be performed by experienced contractors, with an established track record in the terrain typical for the site. Construction on many intermittent drainage crossings would be required, as well as construction of bridges in some areas to minimize the impact where wetland streams would be crossed in the southern part of the trail system along the Union Pacific Railroad. Utilization of the inverted siphon construction between Ridges 11 and 12 may facilitate the trail crossing in this wetland area. "View" areas with spectacular vistas would have a sitting area with potable water, with a view area in the eastern most portion having portable restrooms.

This proposal addresses the issue of balancing the needs of **all** the public when new trail construction is considered, and ensuring all non-motorized user groups needs are considered, as well as addressing construction and maintenance issues. I hope due consideration of this trail proposal will be given.

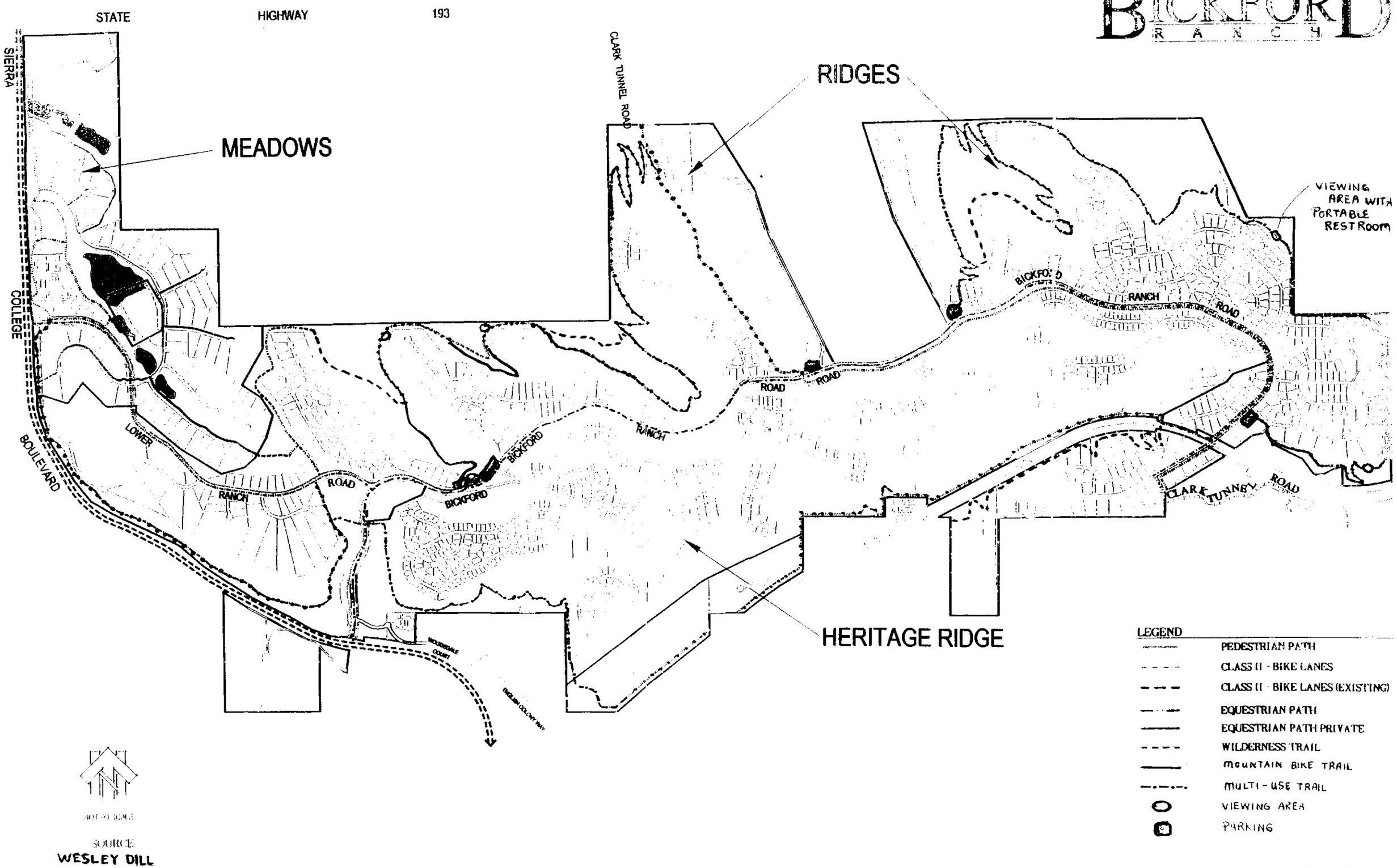
Sincerely,

Wesley A. Dill

Wesley A. Dill

This page intentionally left blank.

BICKFORD RANCH



NOT TO SCALE

SOURCE
WESLEY DILL

TRAIL PLAN

COMMENT LETTER I86

Response I86-1: The trail system proposed by the commentor was evaluated in detail by the County and the County's EIR consultant, and by the Applicant.

Some wilderness trails identified on the north side of Boulder Ridge in the commentor's plan would be located on soils identified by the USDA as having a high erosion hazard. Construction and use of these trails would contribute to Impact G-5 (Potential for increased erosion during and after construction). This impact could be mitigated by considering soil type and trail grade with reference to cross drain frequency, and grades could be minimized on highly erosive soil types. Since cross drains are maintenance-intensive, particularly under equestrian use, trails would have to be designed to eliminate them where possible by rolling the grades, i.e., providing dips on graded sections to eliminate long-sloped trail sections.

High-quality wildlife habitat and wildlife movement corridors in riparian habitat would be fragmented and degraded by use of some of the commentor's proposed wilderness trails in the northeast portion of the project site. These effects on the Natural Open Space (NOS) area of the project site would be a significant impact, if the commentor's proposal were implemented as described.

Two trail segments were identified as being of concern: (1) the proposed wilderness trail segment immediately east of residential area R-11A that bisect the NOS, and (2) the proposed wilderness trail segment north of residential area R-13A that traverses the middle of the NOS. Both of these proposed trail segments would extend into previously protected and undisturbed habitat in the NOS. The first segment would additionally cut off access for smaller wildlife between open-space oak woodland and stream habitats. The streams and associated vegetation are high-value wildlife habitat. The second segment would intrude more deeply into the NOS than the other portions of the proposed trails, creating a barrier between several acres of oak woodland/stream habitat and the remainder of the NOS.

The increased human and domestic pet intrusion into the NOS areas around these segments would also significantly degrade the existing habitat by disrupting wildlife activities, such as breeding, feeding, and movement, and by increasing wildlife mortality from capture by unleashed pets. These areas would have experienced minimal intrusion without the presence of trails due to the steep slopes and dense vegetation present in those areas. Construction of these proposed trail segments would eliminate much of the habitat value that was to be preserved in the NOS on the project site.

If the County's recommendation for multiple-use wilderness trails in the northeast portion of the site is implemented, the severity of this impact would be increased. If the trail corridor must be widened to accommodate multiple-use trails, the severity will increase more.

On April 5, 2000, County and consultant staff were accompanied by John Ramirez of the Placer County Parks Department and the Applicant's engineer on a site visit to visually inspect the proposed segments of concern, and to attempt to identify alternative locations for these trail segments. This team included a wildlife biologist, a geologist, a planner, and an environmental health expert. No reasonable alternatives were identified, although minor modifications to other segments were identified, including locating the trail system along the natural contours where possible, and following the canal system where this was feasible and sufficient setback could be provided.

The modified trail system shown on Revised Figure 3-7 in Chapter 2 of this FEIR is now proposed by the Applicant. It is based on the commentor's suggestions, input from County staff, and input from the environmental team, which recommended deletion of the segments discussed above.

This page intentionally left blank.

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

From Placer Group Sierra Club
Conservation Members:
Gail Mackenroth and Katie Green

COMMENTS ON
BICKFORD RANCH
DRAFT ENVIRONMENTAL IMPACT REPORT

The description of the Bickford Ranch specific plan is reminiscent of a utopian project one might have imagined and designed in a high school civics class back in the 50's. We could envision the most desirable result and idealistic setting without the responsibility of providing necessary amenities and infrastructure, or having to deal with any possible negative future aspects or impacts. We would be living in a perfect world.

At that time, resources were endless, all answers were possible. Only our vision limited the outcome. We have learned differently in the recent past and let's hope we don't wait until we have no more alternatives because our natural resources have either disappeared or have been so compromised as to make them less than viable or desirable.

Then we will travel about in bubble cars, Jetson-style, live in a completely sterile high-tech environment, eating dehydrated food in pill form, where cloning is the reproductive method of choice, and oak woodlands, wetlands and open grasslands will be in zoos, habitat for wildlife which exist only in captivity.

Sounds a bit farfetched perhaps, but lines must be drawn somewhere in order to maintain a balance and the quality of life we so far enjoy here in Placer County.

GENERAL COMMENTS

The Placer Group Sierra Club has become increasingly skeptical of the ability of the professional consulting groups chosen to prepare the DEIRs we review, to thoroughly and objectively evaluate development projects that come before the Board of Supervisors with permit requests. For example: Jones & Stokes DEIR, Teichert Project in Lincoln was deplorably inadequate.

All efforts to comment on the existing DEIR keep leading back to the original changes in the General Plan in 1994 when the designation of special status was granted to the Bickford Ranch area with insufficient public review. All of the these current efforts would have been avoided had the Board of Supervisors at that time not made "back door" agreements out of the range of public scrutiny. We know these kinds of actions occur today as exemplified by the ill- I87-1

conceived rider to Assembly Bill 1480 which would have exempted Teichert from one step in their environmental review process under the Williamson Act.

It has also been brought to our attention in a report by Reuters, that suit was brought against Dames and Moore on October 8, citing "negligent misrepresentations and inaccuracies within some or all of the reports" dealing with another project in Idaho. Are we expected to rely on this source of information?

ALTERNATIVES

All of the references to alternatives state Dames and Moore's preference for any of the alternatives over the proposed project. To Placer Group Sierra Club even the least dense, Alternative 4, the Rural Residential Alternative, isn't acceptable in light of what we know about preservation of habitat today. It would require, for one, better design so far as structure placement in order to maximize the open space and habitat preservation. The 5-acre parcel designation should be configured so as to preserve the most sensitive areas as common space. Without that, there would be little hope of sparing the plant and animal communities living on those 2000 acres today. The only acceptable alternative is No Project. The ten items listed under 2.4, Areas of Controversy, are sufficient reasons for a No Project Alternative. I87-2

WILDLIFE

A local developer made a comment that it is not economically feasible to develop a site unless there is sufficient acreage. By the same token, in order for open space and wildlife habitat to be viable, there must sufficient land to provide adequate forage and mobility for the wild inhabitants. The best way to make a nuisance of wild animals is to deprive them of the requirements of survival, sustenance and protection. Invading two thousand acres of wetlands and woodland habitat will displace an incredible number of individuals, including many listed as endangered and of special concern.

The project purports to leave 40% open space to include the golf course. Protecting space is not simply for aesthetics and elbow room, although these are very significant values to preserve. Many species won't breed and will abandon nests when disturbed by machines or even humans walking by quietly. The presence of 5,000-6,000 people plus dogs, cats, and proportionate numbers of motors, lights, etc. on the remaining 60% of the property will severely impact the life forms on the remaining 40% (minus those on the golf course which have already been removed or find the area inhospitable). I87-3

Where does the wildlife go which is currently occupying the 2000 acres under consideration when they are displaced and their mobility via traditional corridors is prohibited? Dave Filene, county trapper with the Animal Control Division, at a recent Lincoln MAC meeting reported that more than 3000 complaints were responded to last year, many of which were regarding wild animals appearing in inhabited areas. Filene stated that this was a huge increase, and he related it to the fact that the animals are being displaced from their habitat by ever increasing human encroachment.

The proposed project, if approved, designates "view fences. . . designed to preserve views while providing security " along the entire perimeter. Figure 14.5 shows it as open wire screen, certainly not wide enough for wildlife passage, and does not designate its height, but obviously providing another barrier to wildlife passage, creating another enormous nuisance factor.

In Volume II, Figure 7.1, the designated "wildlife travel corridors" was so difficult to locate and minute as to be virtually non-existent and worthless.

ENDANGERED SPECIES

Foothill Yellow-Legged Frog:

It is stated that there are no records of foothill yellow-legged frogs in the study area but that "Clover Valley Creek is considered potential aquatic habitat." Then it states that "no extensive surveys were conducted for this species."

Impact B-18 Degradation of aquatic habitats for California red-legged frog, foothill yellow-legged frog, and northwestern pond turtle is significant. The document goes on to state several impacts to the habitat and its inhabitants which could be residual and ongoing, such as chemical runoff into the creek from the golf course, depredation and disturbance by residents and pets. I87-4

On page 13-43 under 6.A.4 regarding creek protection, it's a concern that even with significant mitigation on the project proponents' part that "Long term maintenance will be the responsibility of the Homeowner's Association or the individual homeowner." With the amount of density being considered, this would be an impact impossible to monitor and control. Some homeowners will act responsibly and others will not, leading to a further gradual deterioration of natural resources. It is ridiculous to suggest that self-monitoring is a workable solution to insuring creek and wetland health.

Cooper's Hawk, SSC:

The document identifies the project site as suitable foraging habitat for this bird. No nest site was allegedly found during the field surveys. A local ornithologist states that they are definitely on-site. The ridge line is also a migratory corridor for many species, including the Cooper's Hawk..

Mitigation Measure B-L: "Before construction of any phase of the project between March and August [my underline], preconstruction surveys for nesting raptors will be conducted." By that time, the raptors will no longer be nesting, but young will be active about the nest area. Disturbance of foraging areas would be disastrous as this is the most precarious time for the young birds. The surveys must be completed prior to submission for approval! I87-5

Yellow-breasted Chat, SSC:

This species requires rather dense, undisturbed riparian habitat. The aforementioned ornithologist who has birded on the site, indicated that he has both seen and heard the Chat. An

ordinary biologist may not have the expertise to sight or identify birds. Chats are quite secretive and call mainly at night and are migratory, so must be looked for in summer.

The Chat has declined, as stated in the DEIR, "from riparian habitat loss and fragmentation." There is really no mitigation for that, only preservation and maintenance of existing habitat, with minimal human incursion. I87-6

The California Yellow Warbler is known to exist in the area as well as the Willow Flycatcher, a special status species not even mentioned in the document. Surveys must be taken in the migration period as well as in the breeding seasons in order to get an accurate documentation. I87-7

Oak Trees:

Under13.3 Impacts, page 13-30, the document states "The loss of large acreage of oak woodland habitat and the loss of wildlife habitat value would be a significant impact of the proposed project. This impact would remain significant following implementation of the proposed mitigation measures and would remain significant and unavoidable following implementation of the recommended mitigation measures." [my underline]

This is inconsistent with the County General Plan, Goal 6.D.8 which requires "that new development preserve natural woodlands to the maximum extent possible." I87-8

Where reference is made to the health, or lack thereof, of a number of trees, particularly those on the ridge cap, it was pointed out by a biologist that the sparsity of soil does stress the trees but does not mean they won't survive and serve a valuable purpose. Even dead trees are necessary habitat for many species. The aesthetic perception of how trees must appear in a managed suburban setting has minimal biological significance in a natural setting, where individuals survive under a wide range of conditions.

In the Draft "Potential Placer Legacy Recommendations and Conclusions" under the Section VIII. Biological Resources (biodiversity and species of concern) , subheading Possible Role for Placer Legacy, Item 3. states: The streams in western Placer County--riparian, aquatic, wetland and associated upland areas--represent some the greatest remaining biodiversity in the western County yet are not consistently protected by existing regulation. These should be the first priority for action. A comment following the noting of this was that "If Placer Legacy has to choose a priority, this would be it." Loren Clark, Senior Planner I87-9

(It is my understanding that this was removed in the final draft. How unfortunate!)

Vernal Pool Fairy Shrimp:

Ref. Mitigation Measure B-H. We believe the jury is still out as to how successful off-site mitigation and construction is in the long run for vernal pools, which are uniquely adapted to specific micro-climates within very confined geographical sites. It is extremely doubtful that they can be successfully replicated in other places. I87-10

The statement in Volume I, page 13-4, para 2nd from bottom of page, refers to the vernal pools in the grassland habitat atop the mudflows and says they "probably do not support typical vernal pool wildlife species." What kind of a word is "probably" in a scientific documentation? Certainly not something one would want to rely on for determining appropriate action and/or mitigation. I87-11

Departure from General Plan: Goal 6.D: Vegetation
6.D.6 states: The County shall ensure the conservation of sufficiently large, continuous expanses of native vegetation to provide suitable habitat for maintaining abundant and diverse wildlife.
6.D.7: The County shall support the management of wetland and riparian plant communities for passive recreation, groundwater recharge, nutrient catchment, and wildlife habitats. Such communities shall be restored or expanded, where possible. I87-12
6.D.8: The County shall require that new development preserve natural woodlands to the maximum extent possible.
6.D.9: The County shall require that development preserve natural woodlands to the maximum extent possible.

Grasslands disappearance is referred to as "of no significance." That is absolutely ridiculous. Grasslands provide a significant food source for a diverse number of species. I87-13

How many opportunities still exist to preserve a site of this magnitude and diversity? I87-14

AIR QUALITY

8.1 states "The Bickford Ranch Specific Plan area is subject to a combination of topographical and climatic factors which result in high potential for regional and local pollutant accumulation.

8.1.2 Ozone: "Ozone concentrations in Western Placer County typically exceed state and federal standards many times during the year and Table 8-1 shows that the state ozone standard was exceeded on 146 days between 1992 and 1996."

Add three years to that and just observe how the traffic on I-80 has increased during that time as certainly the ozone levels have risen.

8.1.3 "Mobile sources are a major source of ozone precursor (Nox and ROG) emissions in Placer County.

8.2.1 Under Federal Law....parts of Placer (including the study area) have received a severe non-attainment designation for the federal ozone standard.

"The goal for attainment of federal standards is 2005; if Placer County does not achieve federal ambient air quality standards by the mandated deadline, the County may be subject to federal sanctions affecting transportation funding ..."

If the Placer study area exceeded the standards for ozone levels in 1994, and the goal is attainment by 2005, adding this project would render that goal impossible! Need we say more? It doesn't make sense to add to already existing non-attainment conditions with the argument that these standards are unattainable. I87-15

Alternative transportation measures need to be in place prior to the addition of any new development. A recent statewide public health study, reported on National Public Radio's California Capitol Report, cited a 75% increase in children's asthma in the Sacramento and Sierra Foothills area largely due to air quality degradation.

The proposed project, by its own admission, conflicts with the General Plan (Page 16-109, paragraph 2). ". . . development in Placer County has continued to exceed expectations. Several developments described in the most recent General Plan in Placer County, including the proposed project, have not been accounted for in growth projections used to estimate future ozone precursors and particulate emissions. The effect of this is that cumulative development in Placer County will likely exacerbate existing air quality problems, and hinder the County's ability to attain state and federal ozone particulate standards. . . The proposed project. . . would therefore represent a significant, unavoidable adverse impact." I87-16

TRAFFIC

We question the analysis and simply don't believe the numbers of vehicle trips stated as being generated by the proposed project. E.g.: 600 trips/day were tallied on English Colony Way. Estimated numbers at build-out are only 900. That just isn't feasible, especially with second residential units permitted for most categories. A traffic analyst in Sonoma County stated that a single household makes an average of four (4) trips per day. Let's multiply that by the over 4000 new residents in the proposed development and the numbers on Sierra College Boulevard, the road through Twelve Bridges over to Rt. 65 and S.R. 193. The impact to 193 between Sierra College Blvd. and Newcastle hasn't even been addressed. Residents heading to Auburn will most certainly travel 193. I87-17

Alternative transportation measures need to be in place prior to the addition of any new development. The County has to demand that a system of public transportation be in place <u>before</u> approving any projects of significant size in the region. Both the 65 and 80 corridors are prime prospects for light rail! I87-18

Mitigation Measure A-L: Provide dedicated parking spaces at the park-and-ride lot with electrical outlets for electric vehicles. I87-19

This is currently a requirement for all new subdivisions in Placer County.

WASTE WATER TREATMENT

This is more or less a moot point. Lincoln is currently designing its own system, period. At this point there is merely a presumption on the part of the developers that there is in fact going to be a Regional Waste Water Treatment Plant. I87-20

WATER

With regard to the supply of water to the proposed development, the developers want a permit before it's clear that PCWA can supply Bickford prior to the building of a permanent pumping station. Treated water obviously costs more than raw water, and the treated water users subsidize the users of raw water, even for non-crucial uses such as golf courses. It requires 1 million gallons a year to irrigate a nine-hole golf course. I87-21

Even though the perception is that Placer County has an ample water supply, delivery systems, ground water levels and extensive seasons of drought put extreme pressure on this finite resource. It's a "pie in the sky" attitude that will say, no matter what we do, or how many more people settle in Placer County, "we will never run out of water."

CULTURAL RESOURCES

Prehistorical:

Of 50 identified cultural sites on the project, 9 were deemed significant. Further on, in 14.1.4, the document states that 17 other archaeological sites were deemed "potentially important." Of those deemed significant or potentially important, only 4 are located in areas designated "open space." The others, the document says "could", and certainly could not help but be affected by proposed project implementation.

This is not consistent with the statement in 14.3.2 General Plan Consistency, that "Identified resources will be included within open space areas or within protective easements." Does this mean "capped" and then the golf course built over it? In our opinion this connotes desecration and disrespect. I87-22

Even though many of the sites are not significant in that many have been vandalized or excavated illegally or ignorantly in the past, the cumulative significance of such a large area is of great importance. No major cultural sites have been preserved in this area, according to one local native American resident with whom we consulted. I87-23

The mitigation measures presented are a joke. No mention is made of grave sites and yet with the large numbers of Maidu people living throughout the area, the presence of burial areas is a given, but not mentioned. It could be of great legal importance and warrant stopping of the project. I87-24

Monetary mitigation for destroyed or covered over sites should be awarded in order to save an entire site in the future. Maybe Bickford could be the beginning of a mitigation bank for cultural resources. I87-25

Any construction activity must have the potential for around the clock monitoring, so that the element of surprise can be exercised at any time, and not just when the archaeologist is present. Particularly following a rain or watering down of the project, discoveries are more easily spotted. Construction workers with bulldozers cannot necessarily be trusted to recognize, value or save cultural artifacts. Even though "important" is defined according to CEQA, the evaluation is somewhat subjective, depending on the expertise of the party viewing it. I87-26

Historical:

Our current rural heritage culture is at stake with this project as well. The proposed development will destroy a large, valuable tract of ecologically diverse rural open space. I87-27

MISCELLANEOUS REMARKS

We resent a couple of steps noted as being taken on site which presume approval of the project. Poles are set, designating hole numbers for the proposed golf course, and some disturbance of vernal pool sites has been done by heavy equipment. I87-28

The objectives of the project setting could be feasible in isolation, granted no other housing developments exist in the vicinity. Even at that, the uniqueness of the ecosystem, noted by a biologist and teacher at Sierra College as "one of the three remaining significant oak-savannah habitats below Auburn" deserves preservation in its present configuration. I87-29

We thereby recommend that this 2000 acre Blue and Valley Oak Woodland Savannah be dedicated in perpetuity to the County as an open space preserve. Further, that management practices exert minimal pressures and instead enhance the viability and preservation of this very rich and valuable ecosystem, for the enjoyment and health of the citizens of Placer County.

I87-30

The Board of Supervisors reviews annually, and every four years extensively reviews the General Plan for any recommended or desirable changes. In light of Placer Legacy and the extraordinary growth pressures on the County, the present designation should be reversed and the above recommendation implemented. That would best serve us all.

RESPONSE TO COMMENT LETTER I87

Response I87-1: For information regarding the General Plan process that designated the Bickford Ranch area as a future growth area, see Master Response GP-1. Regarding the suit against Dames & Moore, see Response 159-9.

Response I87-2: See Master Responses DEIR-2 and DEIR-3.

Response I87-3: See Responses I4-132, I4-346, and I85-103. The modified land use plan shown on Revised Figure 3-3 in Chapter 2 of this FEIR shows lots pulled back and therefore enlarged wildlife corridors in some locations, particularly between M-4 and R-6B, and between M-5 and R-6C.

Response I87-4: See Response I4-150 for a discussion of mitigation measures that protect water quality. For Homeowners Association (HOA) monitoring issues, see Master Response HOA-1 and Response I85-86. See Master Response B-19 and Response I4-149 for results of amphibian surveys.

Response I87-5: As discussed in Mitigation Measure B-L on pages 13-54 and 13-55, the raptor survey is to be completed before project construction begins. If there is evidence of raptor breeding (i.e., territorial behavior, courtship activities) or an active nest is found, the Applicant should contact CDFG and implement Mitigation Measure B-M (see page 13-55 in the DEIR).

Response I87-6: See Response I4-145 for yellow-breasted chat occurrence information at Bickford Ranch. See Master Response B-12 for potential impacts and mitigation measures on non-jurisdictional wetland riparian habitat. The loss or disturbance of this riparian habitat could displace or destroy yellow-breasted chats if they are present in the affected areas. Avoidance mitigation is described in the DEIR in Mitigation Measure B-F on pages 13-51 and 13-52 for potential impacts due to project construction, trail construction, pipeline construction, and fire prevention activities in or near the valley-foothill riparian vegetation. This mitigation also minimizes the loss of riparian wildlife in the project area. These impacts on riparian habitats and associated wildlife will be regulated by CDFG by means of a Section 1603 Streambed Alteration Agreement. Master Response B-14 adds further clarification to Mitigation Measure B-F.

Mitigation Measure B-R on page 13-57 of the DEIR also protects non-jurisdictional wetlands in the Blackberry Eradication Zone by requiring the Applicant to avoid removal of blackberry riparian vegetation. Implementation of this mitigation measure would also avoid impacts on riparian wildlife.

Construction of the golf course could also remove riparian vegetation, which could displace or disturb riparian wildlife, including yellow-breasted chats. These impacts on riparian habitats and associated wildlife will be regulated by CDFG by means of a Section 1603 Streambed Alteration Agreement.

Response I87-7: See Responses I41-2 and I41-3 regarding willow flycatcher and yellow warbler use of the project site.

Response I87-8: See Master Response B-17 for a discussion of how County general plan policies are intended to provide decision-makers with flexibility for evaluating the project in the context of the Bickford Ranch site and Master Response GP-3 for a discussion of Appendix C and general plan policies.

The commentor is correct in that oaks can survive under a wide range of conditions, with varying results in the perceived vigor of the tree. As the commentor implies, wildlife use trees in poor health with exfoliating bark, dead trees and snags and broken-top trees for foraging, nesting, and cover. The oaks growing on Mehrten formation soils along the ridge persist under adverse conditions and likely provide

these habitat features for wildlife. See Master Response B-5 regarding the evaluation of tree health by an arborist as compared to the wildlife habitat function of a tree.

Response I87-9: See Response I4-166 for a discussion of the DEIR evaluation of significant impacts on streams and riparian habitat and mitigation for impacts.

Response I87-10: See Master Response B-15.

Response I87-11: See Response I4-130.

Response I87-12: General Plan Natural Resource policies identified by the County for inclusion in the DEIR are discussed beginning on page 13-41 of the document. Specifically, policy 6.D.9 is evaluated on page 13-46. Policies 6.D.6 and 6.D.7 were not included in the consistency analysis as they were not identified as relevant to a particular development (in this case Bickford Ranch); rather they are intended to guide Countywide planning policies and decisions regarding natural vegetation. Implementation of these policies is intended through Countywide programs, such as the Placer Legacy Open Space and Agricultural Conservation Program.

Policy 6.D.8 requires "that new development preserve natural woodlands to the maximum extent possible." As described in the consistency responses to policy 6.D.3 and 6.D.4, the proposed project would have significant impacts on native vegetation; however, the General Plan contemplated development on this site and compensatory measures are proposed to reduce impacts to natural features. Specifically, an oak woodland conservation and revegetation plan has been prepared by the project Applicant. Tree protection measures are also proposed during project development.

See also Master Response GP-3.

Response I87-13: The DEIR concludes that the loss of annual grassland would be a less than significant impact, not "of no significance." See Response I4-169 for a discussion of the impact conclusion for the loss of annual grassland.

Response I87-14: See Master Response B-3.

Response I87-15: See Master Responses A-1 and A-3.

Response I87-16: See Master Response A-3.

Response I87-17: The daily traffic volume on English Colony Way east of Sierra College Boulevard at buildout of the project is 5,930 vehicles, not 900 vehicles as noted by the commentor. Please refer to Table 7-13 on page 7-25 for this information. See Response I2-4 regarding restrictions on secondary dwelling units, and the likely number of such units.

As noted in Table 7-6 on page 7-10, a single-family dwelling unit (not age-restricted) is projected to generate 9.57 vehicle trips per day, not 4 trips as noted by the commentor.

Contrary to the commentor's assertions, SR 193 east of Sierra College Road is included in the roadway segment level of service analysis. For example, please see Table 7-13 on page 7-25.

Response I87-18: The commentor addresses public transportation systems, including light rail in the SR 65 and I-80 corridors. There are currently no plans to implement light rail in either of these corridors near the project. Transit impacts are addressed in Section 7.3.10 on page 7-32 of the DEIR.

Response I87-19: There is no requirement for electrical outlets for electric vehicles at park-and-ride lots in the Placer County Zoning Code or in State law. The Applicant does not propose electrical outlets or additional park-and-ride spaces.

Response I87-20: See Master Response SS-1, No. 6.

Response I87-21: See Comment Letter A7, comment A7-6, from PCWA, and Master Response WS-1, No. 1, No. 2, and No. 6. Additionally, this EIR does not grant a permit. A permit for construction can only be obtained after water supply is secured.

Response I87-22: In some instances, sites would be placed in open space, in others capped and placed in protective easements. Preserving by placing in open space or by capping were the preferred treatments among the Native American "most likely descendents" (MLDs) identified by the Native American Heritage Commission. Capping was not considered either desecrating or disrespectful by these individuals.

Response I87-23: The DEIR concludes that, because all impacts to important cultural resources would be mitigated to a less-than-significant level, and additional mitigation measures have been identified to deal with unexpected encountering of currently unknown cultural resources during construction, the proposed project's contribution to cumulative impacts on cultural resources is considered less than significant. Cumulative impacts to cultural resources in south Placer County have been acknowledged to be potentially significant (page 16-111).

Response I87-24: Impact C-3 and Mitigation Measure C-E discuss the potential for discovery of human remains. See also Response I1-136 which modifies Mitigation Measure C-E.

Response I87-25: See Response I69-2.

Response I87-26: No burial sites were identified within the project area. The discovery of human remains is discussed in Impact C-3 on page 14-7 of the DEIR, and are specifically called out in Mitigation Measure C-E. Mitigation Measure C-E does require that ground-disturbing activities be immediately stopped in the vicinity if buried cultural deposits are discovered during construction. If the discovery includes human remains, as indicated in Mitigation Measure C-E, the Placer County coroner and, if necessary, the Native American Heritage Commission, will also be contacted.

Response I87-27: See Response I84-64.

Response I87-28: No actions that the DEIR preparers are aware of have been taken by the Applicant which presume project approval. Some staking and soil sampling have been performed as part of the planning process. Poles were placed to identify the initial golf course layout. No heavy equipment has been used and no vernal pools have been disturbed.

Response I87-29: See Master Response B-3.

Response I87-30: The commentor's preference is noted. See Master Response DEIR-3 for a discussion of the approval process.

This page intentionally left blank.

PLACER COUNTY
DATE
RECEIVED
NOV 01 1999
PLANNING DEPARTMENT

COMMENT LETTER I88

6 October 1999

Gina Langford
Planning Department
11414 B Avenue
Auburn, California 95603

Re: Bickford Ranch

Dear Ms. Langford;

I am a longtime resident of Penryn and a lifetime resident of Placer County. I can not express enough my discontent over the proposed project on Bickford Ranch. I believe it was poorly thought out and designed without any conscious thought of current residents of the area. In this letter I would like to address some issues I am concerned about. For ease and clarity of the issues I have put them in bullet format.

- Antelope Creek runs through our property. Therefore, we have riparian rights and have petitioned a use and diversion statement with the State Water Resources Control Board. We are allowed a certain amount of flows and believe that these flows will decrease due to water use at the Bickford Site. Further, we believe that use of pesticides and fertilizers on the ridge will flow down into our creek and reduce its quality. I88-1 I88-2

- Where is all the water going to come from? We are not comfortable with the proposed plan to run pipes up Gold Rush. The construction could effect the integrity of existing wells. I88-3

- Huge developments use a lot of chemicals. If these chemicals (organochlorine, carbamates, organophospates) get into water supplies it is difficult and costly to remediate. We are concerned with our drinking water supply being contaminated with the misuse of insecticide, herbicide and fungicides, not to mention the highly toxic termiticides. I88-4

- Our property is at the valley of the ridge; use of pesticides and fertilizers has the potential to contaminate our property. Further, the Bickford site will be fully paved causing unwelcome runoff to residents below site. I88-5

- It is appalling on how many oak trees the project plans to remove. The claim that the trees will be replaced will not compensate for the loss of these great oak trees. This plan implies that the suitable replacement for the oak trees is nothing more than a paved housing tract with non-native trees that grow well in over watered areas such as lawns, parks and golf courses. I88-6

- The plan is very weak in how it will accommodate the huge flows of new traffic. The roads that are now in place are already over loaded by the population increase in Loomis. Further, the interstate 80 traffic backs up near Rocklin and Roseville where uncontrolled growth has taken place. Residents of the proposed area would most likely come down Sierra College and will either keep going to I-80, turn on King Rd. to access I-80 via Horshoe Bar Rd, or come down English Colony to access I-80 via Penryn Rd. This is going to have huge impacts on the traffic Penryn and Loomis will have, not to mention more than one thousand more cars trying to get on the freeway. These roads were not designed to endure this type of traffic. **I88-7**

- Our rural community is in jeopardy from the Bickford Ranch Project. The EIR implies that this projects will result with a large gated community that has great potential of being self contained. To me this sounds like the makings of a new town. If this happens it is probable that further development will infect our rural lifestyle. This has occurred in numerous other rural areas and resulted in communities becoming poorer due lack of sufficient tax revenues that were brought upon by uncontrolled growth. Right now Penryn is a small rural community that is peaceful and respectful of others land owner rights and privacy. The construction of this asphalt and turf grass amusement park that they call estate lots will not benefit anyone who is already a resident of the area. **I88-8**

I firmly support the no project alternative. Living in the valley below the site my personal views are set that all the activities that occur on the ridge (i.e. pesticides, fertilizers, misc. runoff) will eventually end up, uninvited in my backyard. I do not believe anyone or any group has the right to dump on others land. As a community member I fear for the social integrity, water, soil, air and over all environmental quality of our area. There is not enough water up there to support the project and I am very doubtful on what has been implied about how and where they are going to get their water.

I repeat I am totally against the Bickford Ranch Project as it is proposed and will support any effort to get a no project decision. However, if on some unfortunate event one of the alternatives has to be settled on; project four seems the most reasonable.

Thank you for addressing my concerns.

Sincerely,

Cathy Johnson
6699 Butler Rd.
Penryn, CA 95663

RESPONSE TO COMMENT LETTER I88

Response I88-1: Water use granted by riparian rights would not be affected by this project.

Response I88-2: See Master Response SWQ-1.

Response I88-3: As described on page 316 of the DEIR, potable water for the project would be obtained from PCWA. It would be piped to the project via a 16-inch water pipeline connecting to the project from an existing PCWA pipeline approximately 1,000 feet north of the intersection of Colwell Road and Swetzer Road. The DEIR identifies Mitigation Measure G-C (Comply with the conclusions of a site-specific geotechnical investigation) for concerns related to foundation instability. Such an investigation would identify any special subsurface conditions in the vicinity of the proposed pipeline construction, so that they could be considered during final design.

Response I88-4: The overall design of the proposed project, together with the mitigation measures that would be implemented to preserve water quality, are discussed in Master Responses GW-1 and GW-2 and would reduce the water quality impacts of the proposed project to a less-than-significant level.

It is unclear where the commentor received the information that "huge developments use a lot of chemicals." Studies have shown that the primary impact to groundwater from residential developments is from individual septic systems rather than the misuse of insecticides, herbicides, fungicides, fertilizers and termaticides by residential users in "huge" developments (Sykes, 1989).

Response I88-5: The site would not be fully paved. See Master Responses GW-1 and GW-2 for a discussion of water quality impacts and SWQ-1 for a discussion of stormwater quality impacts resulting from the use of pesticides and fertilizers, and a discussion of water quality impacts resulting from paved areas. See Master Response SW-1 for a discussion of storm water runoff rate and volume.

Response I88-6: See Master Response B-6.

Response I88-7: As noted in the DEIR, without improvements to the roadway system, significant impacts will occur. In most locations, these impacts would occur with or without the proposed project. This is identified in Section 16.5, page 16-108, for traffic conditions with or without the proposed project.

Response I88-8: The growth-inducing impacts associated with development of the Bickford Ranch Specific Plan are described in Chapter 16 of the DEIR beginning on page 16-100. See also Response I49-1.

This page intentionally left blank.

November 4, 1999 COMMENT LETTER I89

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

PLACER COUNTY
DATE
RECEIVED

NOV 01 1999

PLANNING DEPARTMENT

Virginia W. Stuerke
4282 Poppy Hill Road
Lincoln, CA 95648
(916)645-1912

RE: Bickford Ranch Draft E.I.R.

Dear Ms. Langford,

As a 28 year resident of rural Placer County I have long enjoyed the natural beauty, open space, and rural charm of this area. The people are friendly, the children are happy, our senior citizens feel safe, there is room for our pets and livestock to coexsist with the wildlife. The overall quality of life here is quite peaceful. The Placer County General Plan was instrumental in preserving this way of life until its "update" in 1994.

Having thoroughly reviewed Volumes I & II of the Bickford Ranch Draft E.I.R., the Placer County General Plan with particular attention to Appendix C, Zoning Ordinance, Tree Preservation Ordinance, and talking with many of my friends and neighbors, two things seem apparent to me:

1) Appendix C of the General Plan has provided for a vast and varying degree of interpretation by both the Public and the Applicant (Southwest Bickford Holdings, Inc.).

2) Allowing the developement of Boulder Ridge as proposed by Volume II of the Bickford Ranch D.E.I.R. represents a tremendous Breach of Public Trust.

The General Plan states "The goals and policies contained in the *community plans* supplement and elaborate upon, but do not supersede, the goals and policies of the *Countywide General Plan*." (Introduction,pg. 2,para. 4)

DEIR VOL I,Ch 4,Sect 4.2.1,pg 4-5,para 1
The Applicants proposal intentionally disregards at least 23 goals and policies of the General Plan.
GEN PLAN ,Part II,Sect 1,Goal 1.C
Zoning Ordinance defines Rural Area Residential "residential use with a minimum lot area of five acres or more"(pg 409).
Only 33 units with 3.0 to 10 ac. lot sizes can hope to be compatible with surrounding land uses (DEIR Vol II,App A1,Fig 2, pg 4 of 25/DEIR Vol I,Ch 4,Sect 4.3,Impacts L-1/L-2/L-3/L-6,pgs 4-6 thru 4-19/GEN PLAN Goal 1.K,pg 41 & Goal 1.O,pg 47) I89-1

~~with a minimum lot area of five acres or more"(pg 409). Only 33 units with 3.0 to 10 ac. lot sizes can hope to be compatible with surrounding land uses (DEIR Vol II,App A1,Fig 2, pg 4 of 25/DEIR Vol I,Ch 4,Sect 4.3,Impacts L-1/L-2/L-3/L-6,pgs 4-6 thru 4-19/GEN PLAN Goal 1.K,pg 41 & Goal 1.O,pg 47)~~

The proposed developement is entirely inappropriate for this area.(GEN PLAN,policies 1.B.1./1.B.2./1.B.3.,pg 35) This project seeks to dominate and redefine this area. DEIR,Vol II,App A3,Ch 2,Sect 2.3,pg 2-3 describes existing land uses surrounding the Plan Area. By what standards are this developement considered to be compatible with GEN PLAN policies 1.B.5.,pg 36/policies 1.H.1./1.H.2./1.H.3.,pg 39/1.O.4.,pg 47? I89-2

*DEIR Vol II,App A3,Ch 5,Sect 5.8,pg 5-7,para 1 states "Overall, the Plan Area is not an ideal location for affordable housing in that it is not located in an area served by transit and is not proximate to services." Ample provisions for this type of housing have been made in more ideal locations. Gen Plan policies 1.A.3/ 1.B.1/1.B.2 are designed to keep this type of growth in centralized locations. Why have these policies been blatantly disregarded? I89-3

*DEIR Vol I,Ch 2,Sect 2.1,pg 2-1,para 1 states "The Applicant proposes to develope the site with the maximum 1,950 dwelling units" GEN PLAN Appendix C,pg 155,Dev Stnd a. states "A maximum of 1,950 dwelling units." I89-4

"Bickford Ranch is requesting the 10 percent density bonus of 195 units"(DEIR,Vol II,App A1,Sect *Residential*,pg 10 of 25,para 4) "Specific uses permitted within residential land uses include: Single family detached and, secondary residential units in all residential categories."(DEIR Vol II,App A4,Ch 1,Sect 1.1,pg 1-1, para 1) "These (developement standard) regulations amend and where not consistent, supersede otherwise applicable Placer County ordinances and codes"(DEIR Vol II, App A4,Purpose of the Developement Standards,para 2) The Developement Standards, General Plan, and Specific Plan freely violate one anothers' guidelines, in addition to each document claiming the authority to supersede the others' provisions. What exactly are we to believe? In the absence of any definitive number of dwelling units, how can the County expect to determine the reasonableness or accuracy of the findings disclosed by the DEIR Vol I,Ch 4, Sects 4.3 & 4.4/Ch 5,Sects 5.3 & 5.4/Ch 6,Sects 6.3 & 6.4/Ch 7, Sects 7.3 & 7.4/Ch 8,Sects 8.3 & 8.4/Ch 9,Sects 9.3 & 9.4/Ch 10 Sects 10.3 & 10.4/Ch 11,Sects 11.3 & 11.4/Ch 12,Sects 12.3 & 12.4/Ch 13,Sects 13.3 & 13.4/Ch 14,Sects 14.3 & 14.4/Ch 15,Sects 15.3 & 15.4? DEIR Vol II,App A3,Ch 10,Sect 10.6,pg 10-2 thru 10-4/Sect 10.6.1,pg 10.4/Sect 10.6.2,pg 10-4/Sect 10.7.1,pg 10-5,Sect 10.7.2,pg 10-5/Sect 10.7.3,pg 10-6 provides for amendments, revisions, and variances to the Specific Plan,Developement Agreement,and Development Standards."The Specific Plan may be amended as many times as necessary"(DEIR Vol II,App A3,Ch 10,Sect 10.6,pg 10-2,para 1) We trusted the I89-5 I89-6

Planning Commission, Planning Department, and Board of Supervisors with "updating" the General Plan and the County gave us Appendix C, a thoughtless, irresponsible, and vaguely defined document at best. Why should we trust this process to make any further decisions regarding the developement of the Boulder Ridge Area? Again, why wasn't this subject to public referendum?

*DEIR Vol I,Ch 2,Tbl 2-2,pg 2-8 thru 2-34
This Impact Summary Table identifies 123 points of impact to the Site Area and surrounding communities. 13 direct impacts would remain significantly or potentially significant after proposed plus recommended mitigation. An additional 6 cumulative impacts are also in this category. 19 significant and unavoidable environmental effects. How exactly is this acceptable? I89-7

DEIR Vol I, Ch 16,Tbl 16-51,pg 16-98. Alternative 1 is preferred over Proposed Project in 17 of 18 issue areas. Alternative 4 is preferred over Proposed Project in 11 of 18 issue areas. The County and the Applicant could easily develope another 9 Alternatives. I89-8

DEIR Vol I,Ch 1,Sect 1.0,pg 1-1,para 1. This paragraph identifies six CEQA objectives that have not been adequately met. Explain how our state and local agencies intend to meet these objectives. I89-9

*DEIR Vol I,Ch 12,Sect 12.3.3,Pol 6.A.10,pg 12-21. How, specifically, does the County intend to carry out this policy? The County Lab does not have the ability to test wells for nitrates. Groundwater contamination has not been adequately addressed. I89-10

DEIR Vol I,Ch 12,Sect 12.4,Meas H-I,pg 12-25,para 1 states "open segments (of canal) could receive potentially contaminated runoff unless specific measures are implemented." What are these measures? How will they be implemented? How will "monitoring following buildout","monitor for two years after implementation of final erosion control","monitoring runoff quality by visual and/or analytical means"(DEIR Vol I,Ch 12,Sect 12.4/Mitigation Meas H-A thru H-K/pg 12-22 thru 12-26) These are quotes from random paragraphs. These mitigation measures are exceedingly weak, not to mention being too little, too late. I89-11

*DEIR Vol II,App A4,Ch 14,Sect 14.1,pg 14-1,para 1."Walls and fences are prominent design elements in any residential area" Sect 14.3,Fig 14,pg 14-3 This map (Fences and Walls Location) "Boundary Security Fence","Privacy Fence/Walls" Sect 14.7,pg 14-6 "Community walls shall be consistent throughout each community", "Should not exceed 6'6" in height",Sect 14.3,pg 14-2,para 1 states "Solid fences should be used for screening of residential yards",Sect 14.2,pg 14-1,Guideline a.,"side yard or rear lot line fences, walls, or hedges shall not exceed 6'-6" in height"(DEIR Vol II, App A5,Fig 2.1e) Map depicts 14 Vehicular Access Gates. DEIR Vol II,App A4,Ch 16,Sect 16.1,pg 16-1 states "Extensive attention should be paid to public safety and welfare"Sect 16.4, Concept e.,pg 16-4,"Pathway lighting sufficient to provide safety" This is an extremely rural area. We have a good dog and a flashlight for security & safety. This developement proposes isolation within itself and from the surrounding communities. Why is this level of security necessary? What type of element I89-12

does this project seek to acheive?

The density & design of the proposed developement as outlined in DEIR Vol II,App A3 and DEIR Vol II,App A4 are hugely inconsistent with the surrounding communities and the General Plan. The 123 environmental impacts identified by the E.I.R. seem to be sufficient to warrant a much greater inclusion of CEQA laws and procedures. This project should be approved through an initiative and public referendum process. The consequences and effects of allowing this type of developement in this area are simply too great not to. I expect our decision makers to make an informed decision on whether or not to approve this project. This decision should include public participation to the greatest extent possible. To adopt this Plan as is would be environmentally irresposible. Has the Boulder Ridge Area been included in the open space survey scheduled to be completed in 6 to 8 months? If not, why not? The General Plan, Specific Plan, and Volumes I & II of the DEIR raise an astounding number of questions that deserve to be answered. Application of the Developement Standard regulations are intended to encourage the most appropriate use of the land, create a harmonious relationship among land uses, and protect the health, safety, and general welfare of the community. This document attains no such compliance with these provisions. Please explore other alternatives which would seek to provide a more thoughtful and dignified approach to the developement of this area. 189-13

Sincerely,

Virginia W. Stuerke

Virginia W. Stuerke

I ALSO SUPPORT THE DOCUMENT SUBMITTED BY THE RICKFORD RANCH HERITAGE COALITION.

V.W.S.

RESPONSE TO COMMENT LETTER I89

Response I89-1: The commentor has made three statements and cited various sections of the DEIR, the Initial Study and the General Plan. With regard to the first statement, the commentor did not indicate which "23 goals and policies of the General Plan" were disregarded. Paragraph 2 on page 4-15 of the DEIR states that "an assessment [was done] of the General Plan policies which are relevant to the project." The second statement references General Plan Goal 1.C which "designate[s] the Boulder Ridge area for future Rural Residential development." Policy 1.C.1. goes on to state that "this [Boulder Ridge] area, to be known as the Bickford Ranch Specific Plan Area, shall be subject to the development standards outlined in Appendix C." This being the case, the Boulder Ridge Area may be developed at a higher density than allowed under the Rural Residential designation, subject to preparation of a specific plan. It is not clear as to how the subsequent references are intended to relate to the third statement, "[O]nly 33 units. . . can hope to be compatible with surrounding land uses."

Response I89-2: The first two statements in this comment are noted as the commentor's opinion. With regard to the project's consistency with the General Plan policies cited:

1.B.5. The project was evaluated for consistency with this policy on pages 4-15 and 4-16 of the DEIR.

1.H.1. The County has redesignated the Bickford Ranch Specific Plan Area as an area for increased density development (Policy 1.C.1).

1.H.2. The growth-inducing potential of this project is discussed beginning on page 16-100 of the DEIR. While the Placer County General Plan designates the project site for planned residential development, as is proposed with this project, surrounding properties are intended to remain rural and agricultural. The change in land uses resulting from development of Bickford Ranch at the higher density is not expected encourage expansion of urban uses into the surrounding agricultural areas.

1.H.3. Although the proposed project is consistent with (a) and (b) of this policy, the policy does not actually apply to this project since the County has already redesignated the site for increased density development under a specific plan (Policy 1.C.1).

1.O.4. The project was evaluated for consistency with this policy on page 4-18 of the DEIR.

Response I89-3: An affordable housing component has not been included in the proposed project. As described in Chapter 2, the Applicant has revised the project description to include 40 units of market-rate multi-family housing near the intersection of Bickford Ranch Road and Lower Ranch Road. General Plan policy 1.A.3 requires the County to distinguish between urban, suburban and rural areas in order that areas for development are identified and infrastructure and services are provided. The General Plan has identified the project site as an area for suburban development (policy 1.C.1), subject to the preparation of a specific plan. The Board of Supervisors identified the project site as a new growth area. See Master Responses GP-1 and GP-4.

Policy 1.B.1 promotes the concentration of new residential in higher density areas adjacent to major transportation corridors and transit routes. The project site is located adjacent to Sierra College Boulevard and State Route 193. Transit services are intended to be available for future residents and recommended mitigation measures include requirements for the Applicant to provide funding if not available through other sources. Policy 1.B.2 encourages the concentration of multi-family housing near downtowns, village centers and commercial areas. The proposed multi-family housing is located near the village commercial area. This central area has been identified as a village core area as described in Appendix C of the General Plan.

Response I89-4: The commentor is correct. The Applicant proposes 1,950 units. The project complies with General Plan Appendix C regarding the maximum number of allowable units.

Response I89-5: The commentor is quoting from the Initial Study prepared for the Notice of Preparation of the EIR. The Applicant is no longer requesting a 10 percent density bonus with this project. The project description in Chapter 3 of the DEIR does not include a 10 percent density bonus. The Specific Plan will limit construction of secondary residential units. See Responses I2-4 and I85-47.

Since the Applicant proposes to construct 1,950 units, as allowed under Appendix C of the General Plan, the DEIR recommends that the Applicant either 1) construct 195 units (10 percent) onsite affordable to low-income households earning 50 to 80 percent of the County median income; or 2) pay an in-lieu affordable housing fee. See also Response I1-57.

Response I89-6: Any subsequent amendments to the Specific Plan will require a public hearing and approval by the Board of Supervisors. See also Master Response GP-1.

Response I89-7: See Master Response DEIR-3.

Response I89-8: Comment noted. See Master Responses DEIR-2 and DEIR-3.

Response I89-9: The DEIR is only one step in the overall CEQA process. The six objectives of CEQA listed on page 1-1 of the DEIR are met at different steps in the CEQA process, as described below:

- The DEIR has disclosed to decision-makers and the public the significant environmental effects of proposed activities in Chapters 4 through 15, and as summarized on Table 2-2 on pages 2-8 through 2-34.

- The DEIR has identified 117 mitigation measures to avoid or reduce environmental damage, as listed on pages xvii through xx of the Table of Contents, as summarized on Table 2-2, and as discussed in the last section of each of Chapters 4 through 15.

- The DEIR prevents environmental damage where feasible by identification of mitigation measures as described above, and by considering and evaluating a range of potential alternatives to reduce environmental damage (see Section 16.1). The Placer County Board of Supervisors may, upon the recommendation of the Placer County Planning Commission or at their own discretion upon review of the facts, reject or add mitigation measures and/or require that one or more feasible alternatives or components of alternatives be implemented. This process does not occur prior to public comment on the DEIR and preparation of this FEIR for consideration by the Board of Supervisors.

- Agency approvals will not occur until the Board of Supervisors considers this FEIR, as described above.

- A total of 23 public agencies received copies of the Notice of Preparation and copies of the DEIR, in addition to 13 Placer County agencies or departments. Thirteen agencies provided comments on the DEIR. All agencies will also receive copies of this FEIR. The County, the DEIR preparers, and members of the Applicant's development team have corresponded with or met with many of these agencies, sometimes several times, regarding the proposed project. Many agency comments or concerns have been incorporated into the proposed project design. For instance, the original location of the fire station site was changed based upon input from CDF, a site has been reserved for a

school should this be needed in the future, and the water tank was relocated upon direction from PCWA.

- If the number of comment letters received regarding the DEIR is any indication, the goal of enhancing public participation is being fully met. There will be additional opportunities for public participation, including Planning Commission meetings and the certification meeting at the Board of Supervisors. See also Master Response DEIR-1.

Response I89-10: The County would implement Policy 6.A.10 through implementation of County ordinances dealing with well and septic system installation, approval of the Final CHAMP, and approval of the Lake Management Plan. The CHAMP in particular contains provisions that the Applicant, through the HOA, monitor nitrates. A detailed program is spelled out in the CHAMP, including monitoring locations, timing of sampling, and specific descriptions of actions to be taken in the event elevated nitrate levels are encountered. See also Master Response GW-5.

Response I89-11: Mitigation Measures H-A through H-K requires development, design and implementation of specific runoff rate, volume and water quality controls, monitoring of the controls, implementation of a lake management plan, buffer zones to protect canal water quality, implementation of County policies and ordinances relating to the permitting, design and construction of septic systems, and notification of public officials and affected parties in the event of a break in the off-site sanitary sewer system. County Staff will be involved in the review and approval of many of these measures as part of the approval process for the project. The measures will be implemented concurrent with construction and many require specific actions in perpetuity. See also Master Response SWQ-1.

Response I89-12: The proposed project does not attempt to isolate itself from the surrounding community. Perimeter fencing, where installed, would be open, 3-wire with metal post fencing similar to the existing perimeter fencing and to commonly erected fencing within the surrounding rural area. While solid fencing is called for to screen residential yards, this is not uncommon among surrounding residences. The commentor correctly states that the Development Standards limit the height of such walls as well as hedges to 6 feet, 6 inches, so as not to provide a forbidding façade. The DEIR preparers agree with the commentor's concern regarding access gates, and have identified Mitigation Measure L-C, which would require the Applicant to limit the number of access gates. See Response I1-48.

Pathway lighting and other safety measures are responsible components of a well-planned community where residents have a right to reasonable security measures. Not all individuals have dogs, want dogs, or would appropriately use dogs for security. The proposed project would be open to all individuals willing and able to purchase lots or homes in the proposed project.

Response I89-13: Several opportunities for public participation and input on the project will be available as part of the project approval process. Public hearings will be scheduled before the Planning Commission and the Board of Supervisors, giving these hearing bodies the benefit of public input prior to making their decision.

It is assumed the commentor is referring to the Placer Legacy program regarding consideration of this property for inclusion in an open space survey. See Master Response B-3.

This page intentionally left blank.

COMMENT LETTER I90

TRACEY SCOLEDES

PLACER COUNTY
LATE
RECEIVED 11/01/99
NOV 01 1999
PLANNING DEPARTMENT

I am opposed to the massive development of Bickford Ranch and disturbed that a development with such environmental impact is in the Planning Stages. I90-1

I support each concern noted in the Bickford Ranch Heritage Coalition's submitted document.

As a resident of Granite Bay, my area of Sierra College will also be greatly impacted w/ over 2x the traffic we currently must live with. I90-2

Regards -
Tracey Scoledes
4570 Rolling Oaks Dr.
Granite Bay, CA 95746

©1995, DAY-TIMERS, Inc ALLENTOWN, PA

PRODUCT NO. 91857 PRINTED IN USA

This page intentionally left blank.

RESPONSE TO COMMENT LETTER I90

Response I90-1: Comment noted. The Bickford Ranch Heritage Coalition letter is identified in this FEIR as Comment Letter I4, and is responded to above. See also Master Response DEIR-3.

Response I90-2: Contrary to the assertions of the commentor, Sierra College Boulevard in the Granite Bay area would not double in traffic volume as a result of the Bickford Ranch project. Current Sierra College Boulevard daily traffic volumes near Douglas Boulevard are 16,800 vehicles per day. Less than ten percent (less than about 1,250 daily trips) of the Bickford Ranch project traffic is expected to travel on this segment of Sierra College Boulevard.

This page intentionally left blank.

Author: "Patti Gould" <patti@wizwire.com> at internet
Date: 10/31/1999 9:34 PM
Priority: Normal
TO: Planning at PLACER02
Subject: Bickford Ranch

COMMENT LETTER I91

---------- Message Contents ----------

I am writing concerning the Bickford Ranch development. I, along with a number of people are concerned about this project and the potential problems that would be generated by having such a large development in this rural setting. This area is predominatly zoned for 10 acre parcels and the proposed residental development will include only 33 parcels with 3 to 10 acre lots and they propose to put 1,950 homes in this development. This areage is one of the few parcels left in this whole area that hasn't been divided. I feel this is a very sad commentary on overall parcel planning to okay a development of this size and density in such a beautiful, rural setting. Someday Placer County may be just another crowded suburb like so many in the Bay Area, but it really is a shame that it has to happen in such a beautiful, rural place. Please reconsider this development and the long-term problems with putting an major, high density development in this area. Thank you. **I91-1**

This page intentionally left blank.

RESPONSE TO COMMENT LETTER I91

Response I91-1: See Master Comments DEIR-3 and GP-4.

This page intentionally left blank.

October 29, 1999

PLACER COUNTY
DATE
RECEIVED
NOV 01 1999
PLANNING DEPARTMENT

Gina Langford
Senior Planner
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Dear Ms. Langford,

I am a concerned citizen writing to you about the proposed Bickford Ranch development project and the DEIR issued by Placer County. Based on my understanding of this project and the DEIR I am very much opposed to this development and believe that its approval and subsequent completion would have a tremendously negative impact on the environment and on the community as a whole.

The construction of 1,950 homes, most on less than 1/4 acre each, would be in direct violation of Placer County ordinances that require that suburban development be restricted to already existing suburban areas, that rural areas remain rural, and that rural homes be built on a minimum 2.3 acres. I92-1

Vehicle trips exiting onto Sierra College Blvd. and connecting roadways will increase from between 5,000 and 6,000 per day to 12,503 per day. (See DEIR, Volume 1, Chapter 7, pages 7-10 and 7-11) I92-2

Roadways and intersections in the area, most notably Sierra College Blvd., would be degraded from LOS standard A to LOS E or F. (See DEIR, Volume 1, Chapter 2, pages 2-13 through 2-16) I92-3

Already poor air quality would worsen with the addition of significant amounts of sulfur oxide, nitrogen oxides and reactive organic gases. These emissions exceed Placer County's own air quality criteria. (See DEIR, Volume 1, pages 8-10) I92-4

Construction excavation on the surrounding ridges will cause fractures in the lava cap. (See DEIR, Volume 1, Chapter 10, figure 10-1) In combination with the very thin layer of soil on the lava caps, these

fractures will increase the likelihood that chemicals (fertilizers, insecticides, herbicides, fungicides, gasoline and oil residue from motor vehicles) from the proposed homes and golf course will seep and/or run into surrounding watersheds and groundwater aquifers and possibly pollute the wells (drinking water) of already existing homes. Ground water impacts often occur or are detected years after the event or activity that causes them. (See DEIR, Volume 1, Chapter 12, pages 12-16) When will current homeowners find out that their wells are polluted or that their families, pets and/or livestock have been poisoned? I92-5

Approximately 960 acres of oak woodland and 11,700 native trees protected by the Placer County Tree Preservation Ordinance would be eliminated. The removal of these trees and the associated oak woodland would result in a permanent loss of important plant and wildlife habitat. (See DEIR, Volume 1, Chapter 13, pages 13-28 and 13-29) I92-6

The high-density housing and negative environmental impacts associated with this project make it a major mistake for our community. As a representative of Placer County I strongly urge you to oppose the Bickford Ranch development! If this is not possible I would request that you at least require the developers to limit the homes to the existing one home per 2.3 acres required by Placer County ordinance and that you require that all negative environmental impacts be minimized.

Sincerely,

Richard J. Simon
2850 Sage Lane
Lincoln, Ca 95648

RESPONSE TO COMMENT LETTER I92

Response I92-1: The commentor does not cite the specific ordinance(s) to which he is referring. He may be referring to General Plan Policy 1.H.1 which "maintain[s] agriculturally designated areas for agricultural uses and direct[s] urban uses to designated urban growth areas and/or cities." Since the County has redesignated the Bickford Ranch Specific Plan Area as an area for increased density development (Policy 1.C.1) under a specific plan, the proposed project is not inconsistent with this policy.

Response I92-2: Comment noted.

Response I92-3: Comment noted.

Response I92-4: Comment noted. The commentor is correct in stating that the emissions exceed Placer County's own air quality criteria, as identified in Section 8.3.2. The DEIR identifies a number of mitigation measures to reduce the impacts of the proposed project on air quality. These are discussed in Section 8.4 on pages 8-18 through 8-22 of the DEIR, and were developed in cooperation with the Placer County Air Pollution Control District. While the mitigation measures identified would reduce the increase in regional criteria air pollutant emissions to a less-than-significant level, as discussed on pages 8-13 through 8-16, the proposed project would still be inconsistent with the goals of the Placer County Air Pollution Control District. This would be a significant and unavoidable impact of the proposed project, as described in Impact A-4 on page 8-16.

Response I92-5: See Master Responses GW-3 and GW-5.

Response I92-6: See Master Response B-6.

This page intentionally left blank.

PLACER COUNTY
DATE
RECEIVED

NOV 01 1999

PLANNING DEPARTMENT

October 29, 1999

Gina Langford, Senior Planner
Placer County Planning Department
DeWitt Center
11414 "B" Avenue
Auburn, CA 95603

To Whom It May Concern:

Thank you for providing us the opportunity to respond to the Bickford Ranch Draft Environmental Impact Report and extending the deadline to November 1, 1999. Unfortunately, there are so many significant issues associated with this project that an endless amount of time could be spent identifying and discussing our many concerns. In this letter, we attempt to address the most important points.

Here is an outline of the topic covered in the following 11 pages:

I. Environmental Issues
II. Traffic/Congestion
III. Pollution
IV. Utilities
V. Water
VI. School Districts
VII. Public Areas
VIII. Political Contributions/Miscellaneous
IX. Signature Page

We appreciate your willingness to consider this information and address it prior to making your decision concerning the proposed Bickford Ranch Development.

CC:

Members of the Placer County Planning Commission:
Noe Fieros
Larry Sevison
Judith Creek
Ken Denio
James Forman
Gerald Brentnall
Ronald Coleman

and

Members of the Placer County Board of Supervisors:
Robert Weygandt
Harriet White
James Williams
Bill Santucci
Rex Bloomfield,

I. Environmental Issues

- There will be a significant increase in lighting associated with the development of this project including impacts associated with direct light sources and indirect light impacts associated with an increase in ambient light levels. How will Placer County address this issue? **I93-1**
- What are the ridgeline development impacts with the proposed project? The ridge top soils in the proposed development zone are very hard. Water runs off them quickly to lower elevations. Paving will increase this tendency for water to run off to lower elevations. **I93-2**
- Will grading affect the stability of the UPRR Clark Tunnel? **I93-3**
- What about the geologic conditions for the site. The EIR should show how grading operations on the site will affect the ability for groundwater to be recharged. **I93-4**
- What about air quality deterioration due to the construction, additional fireplaces, increase in cars, exhaust, traffic congestion and truckers? **I93-5**
- The trees on the proposed development site are hundreds of years old. How can they be replaced? What is the guarantee they will grow? **I93-6**
- The Draft EIR addresses the 78,700 trees 6 inches and greater. Of those, 15% will be INTENTIALLY destroyed. How many of those will be unintentionally DESTROYED due to root damage, environmental changes, changes in water patterns, etc.? **I93-7**
- How many trees are there under 6 inches. Each of these trees represents 1-20 years of growth, which will also be eliminated. How will the replacement of these be addressed? **I93-8**
- What do studies show of the survival rate of transplanted oak trees versus naturally seeded oak trees? It is a known fact that the transplanted oaks have a VERY LOV survival rate. How will the 21,200 newly planted trees be planted and watered, fertilized and cared for on a regular basis. Who will pay for the ongoing costs to ensure these trees grow? Is the watering of these trees a temporary system? **I93-9**
- How can the loss of these beautiful and historic oak trees ever be measured or replaced. They have taken decades and even centuries to become what they are today. The environmental changes due to this project would be irreversible. How can the County allow the removal of these trees and not be in violation of the Placer County Tree Preservation Ordinance? **I93-10**
- The wildlife is already moving in closer due to all the developments by DelWeb on Highway 65. There are proposed wildlife areas in the new development. How will the wildlife know which areas they are to remain in and which areas they are not to set foot in? Frankly speaking, the wildlife WILL be destroyed and much of the natural habitat as well. **I93-11**
- Traffic levels on Sierra College Boulevard, State Highway 193 and Highway 65 are already high. They have increased significantly over the past several years without any high density developments. The cumulative impacts of these projects are significant and will turn our front yards into a freeway. That is not why we move into the country. **I93-12**
- The huge increases in vehicular traffic will create corresponding increases in traffic noise levels. This will further alter the quality of life in the development impact zone. **I93-13**
- The ridge tops and meadows are presently grasslands interspersed with oak and pine. These are home to wild turkey, deer and other native inhabitants. A substantial portion of the proposed development would be paved or intensively landscaped, rendering it unusable to native flora and fauna. Trees will be removed. This represents another negative impact on the character of life in the development zone. **I93-14**
- At what point will the natural trees in the area no longer have enough water to survive? **I93-15**
- What impact will developing and related changes in water runoff patterns have on wildlife use patterns both on the property and in all of the drainage's and surrounding lands that the current ditches service? Have population studies been done to assess what types and numbers of resident and migratory species inhabit the development and surrounding drainage's/habitat? Are there trees and other vegetation that will suffer from changes in water flows and public use patterns? **I93-16**
- This area is rich with Native American artifacts. In some areas, these artifacts are close to the surface; in others they are several feet below ground. Have any local elders been consulted on the Cultural Resource survey that has been completed and do they accept it? What provisions are made to handle discovery of artifacts that are discovered during development? **I93-17**

II. Traffic/Congestion

- English Colony Road will receive an increase in traffic from Sierra College Blvd. through the Penryn Community. The proposed project needs to examine the impact on this road and any necessary improvements to mitigate the impact. **I93-18**
- Is Clark Tunnel Road suitable for emergency vehicle access to the East End of the project in event Sierra College Blvd. is closed? **I93-19**
- What changes will be made to Sierra College Blvd. prior to the project starting and how will the changes/improvements be paid. How will those changes benefit the projected traffic congestion problems? What changes are guaranteed by the project and what are just suggestions to be done at some unknown future date? How will the projects be funded? **I93-20**
- Currently, Sierra College Blvd. is used by joggers, pedestrians and bikers. There is wide shoulder on both sides which is utilized by these groups of people. How will the traffic affect these recreational activities? If turn lanes are incorporated, will the pavement from the shoulders be utilized or will the roads actually be widened to accommodate the increased traffic flow? **I93-21**
- If Sierra College Blvd. is closed due to an accident/fire or construction, what will be the alternate route for through traffic? **I93-22**
- Traffic at the intersection of 193 and Sierra College Blvd. is already congested even without a high density development project such as this one. How will traffic lights improve traffic conditions? Truckers and commuters are frequent uses of both roads and stopping traffic at this intersection will increase congestion, increase pollution, length of commute time for all individuals, decreased efficiency in traffic patterns and contribute to an already over-polluted Placer County Basin. **I93-23**
- There are significant traffic issues already at the intersections of Sierra College Blvd. and the following cross streets: Taylor Road, Granite Drive and Highway 80 On Ramp and Off Ramp. The additional increase in traffic occurring as a result of this project will cause serious traffic jams, increased wait times and delays at each of these intersections and it will triple or quadruple the commute time for all travelers. If a train is present at Taylor Road, traffic becomes a gridlock. This situation increases the pollution and exhaust emissions from the vehicles and contributes once again to the already existing pollution problems in the Placer County Basin. **I93-24**
- Any proposed stop signs or lights along Sierra College Blvd are ludicrous and suicidal. The roads are curvy and hilly!!! There are many blind corners!!! There are lots of truckers that need lengthy distances to stop. Any turn lanes created will affect the shoulders where there are bikers, pedestrians and joggers. ACCIDENTS WILL OCCUR! Is someone's life worth this project? What are the developers plans to widen Sierra College Blvd. to four lanes and what is their commitment to covering the costs for such an enormous project? **I93-25**
- Once the Proposed Bickford Ranch Project is completed, who will pay for the necessary resurfacing of Sierra College Blvd. which will literally be ruined with the increased traffic, trucking, construction vehicles, earth movers, tanks and tractors associated with the proposed project? **I93-26**
- In addition to the increase in traffic from cars, there will be increased traffic from newspaper delivery, postal delivery, UPS, FedEx, garbage collectors, utility companies, service repair, pool maintenance, landscapers, tree trimmers, solicitors, bottled water delivery persons, etc. Has this traffic been taken into consideration as well? **I93-27**
- Traffic congestion issues need to be resolved PRIOR to the development of the project. Once traffic has become a major issue is NOT the time to make it worse by closing the roads to one lane as improvements are made. Has the county addressed this? **I93-28**
- The traffic from Lincoln, Twelve Bridges and the DelWeb project are already significantly impacting Sierra College Blvd. and Highway 193 to extreme and unsafe levels. Any traffic issues should be solved PRIOR to the ADDITION of a new project. **I93-29**
- This project would compound traffic into and out of Loomis, Rocklin, Penryn, Newcastle communities and surrounding residences possibly impacting the natural residential growth and population. There would be increased congestion and delays at Penryn and Loomis interstate interchanges resulting in increased congestion on freeway and surrounding surface streets (i.e. Penryn Road, Horseshoe Bar Road, Highway 65, Newcastle Exit, Rocklin Road and Sierra College Blvd.). **I93-30**

- This project would also increase congestion to the already existing freeway congestion and traffic delays into the Sacramento metropolitan and surrounding areas, as well as delays into the rural Sierra foothill communities. I93-31
- The highway maintenance and road repair is already insufficient to support current utilization. I93-32
- Clark Tunnel Road, Butler Road, English Colony Road and gold Rush Way are not wide enough o accommodate projected commercial area residential volume. I93-33
- There is little to no shoulder area on Clark Tunnel Road, English Colony Road, Butler Road and Gold Rush Way for pedestrian traffic, cycle thoroughfares and/or horses on surface streets to provide safety. I93-34
- The projected traffic volume will impact circulation to surrounding community services from surface streets into Loomis, Penryn, Newcastle, Rocklin, Roseville and Lincoln. I93-35
- There will be increased ambulance and emergency vehicle traffic due to projected elderly population at the age restricted Heritage Ridge facility. I93-36
- One accident or fire on Sierra College Blvd. can close the road for hours. If this occurs, what happens then? Clark Tunnel Road is closed to all traffic and Highway 65 is a parking lot. What is the County's plans to avoid total gridlock or is that an acceptable solution at this time? I93-37
- There is currently a park and ride at the end of Sierra College Blvd. at the end of Sage Lane in Lincoln. On average, there are between 0-2 cars per day using the park and ride facility. How will the proposed park and ride at Bickford Ranch assist in the reduction of traffic? I93-38

III. Pollution

- The EIR should examine and address the surface and groundwater contamination associated with the maintenance and operation of the golf course. I93-39
- Air quality in the area from Lincoln Easterly toward Newcastle and Auburn has been deteriorating for many years but seldom has it approached that amount of pollutants as in the Loomis Basin. With this proposed project, we will become another basin for the pollutants with the increase in population and the subsequent increase in automotive traffic. The huge increases in vehicular traffic will produce corresponding increases in the pollution associated with auto emissions: nitrogen oxide, carbon monoxide, etc. What are the Counties plans to address this SERIOUS problem? I93-40
- What is the potential for adjacent water well contamination as a result of increased use of fertilizers, herbicides and insecticides by the projected golf course and residential users? How will downstream properties be protected? Will the added levels of impervious surfaces affect the run-off levels that might potentially impact Placer County? I93-41
- The proposed golf course developments will require frequent and intensive applications of fertilizer, pesticides, herbicides and other chemicals used in this type of landscape maintenance. A similar maintenance regime will apply to lawns and landscaping around residential units, parks and trail areas. The soil cannot absorb all these chemicals. They will run off into adjacent streams and groundwater. What will be the affect on water drawn from residential wells in the vicinity? I93-42
- What is the impact of the air pollution on Placer County and the Sacramento Valley as well as Lincoln, Loomis, Penryn and Newcastle as a result of this development? I93-43
- The increase and traffic congestion, particularly vehicular traffic, should have an effect on air quality and pollution. What types of precautions are being taken to reduce these problems? I93-44
- Air quality is a major concern. The development would add over 5,000 vehicles, as well as leaf blowers, weed eaters, lawn mowers, and other power equipment which have been shown to be significant polluters. This added contamination will be to an area which now has some of the most polluted air in the state. Already, there are days when here in the foothills we are advised to stay indoors, and children may not play. High school athletes have practices and meets and games canceled. What will the future be with this development? I93-45
- Air quality in this basin is a problem today. We have no way to flush out our air. There are problems to children and older people when they fill their lungs with polluted air. This development will only compound the problem. I93-46
- The pollution that will arise from this project is INCONSISTENT with the goals of the Placer County Air Quality Attainment Plan. How does the county propose to address the pollution issues?
- If the timeline of the proposed project is over eight years, this will mean eight years of noise, dust, diesel exhaust pollution, construction traffic and other disruptions to our placid rural area. Then we will be left for life with the effects of the project itself, increased traffic, pollution, reduced wildlife and natural open areas, etc.

IV. Utilities

- For those surrounding dwellings with well water, what is the guarantee that their wells will not run dry or be contaminated as a result of the project? If either of the above situations occurs as a direct result of the project, what solution is the developer prepared to offer the surrounding families? What other alternatives will these homes have for water if their water is dried up or contaminated? We want guarantees on water levels and water quality for our wells. **I93-47**
- Who will incur the costs of providing water, sewer, electricity, gas, waste and other utilities to the proposed project? Will the costs be fully covered by the developers and/or new residents? Can the county guarantee that current local residence utility fees will NOT be increased as a direct result of the proposed project? **I93-48**
- The existing sewage treatment facilities are inadequate throughout the region and cannot handle this project without significant improvements. The sheriff, fire and other emergency services are already understaffed, short on funds and cannot effectively deal with the amount of homes being proposed with this development. How will the County address these issues? **I93-49** **I93-50**
- The increased radio wave congestion will affect the surrounding areas. **I93-51**
- How can the local communities be guaranteed that they won't be assessed for the infrastructure because the developers are not covering the costs of all related utilities? **I93-52**

V. Water

- What does the 100 year flood plan look like? How high does it go? How fast will it flow? Is the flood control plan adequate for this development and its surrounding community with the elimination of a great percentage of the land's sponge aspect? **I93-53**
- There will be a significant impact on natural underground springs, creeks and ponds. **I93-54**
- With the increased utilization, there will be an impact on existing Placer County Water Agency's irrigation canal.
- There is increased canal maintenance resulting in less annual water available to residences.
- There is an increased cost to maintain canal with increased demand.
- Many of the farms and residents in the community receive water from the Caperton Canal. Some of these farming operations have a very critical need for an uninterrupted supply of water. The developers need to guarantee a lack of interruption as well as access by road to the point of distribution from the Caperton Canal to the individual ditches or pipelines of the farmers as well as access for maintenance along these ditches, pipelines and filtration devices. **I93-55**
- Caperton Canal has been at capacity for years. Will the demand for irrigation water from Caperton force water to be redirected from agricultural use to supply the proposed development?
- Will any existing water rights be compromised by the proposed project? Will Penryn residences loose all access to the canal.
- While we understand that water will be brought in using current delivery systems, it is unclear whether storage reservoirs which feed these systems have the capacity to meet the water/sewer needs of so many new residents. Do they? What is the average water/sewer calculated usage for planned homes on small lots? For those on larger lots with acreage? If large expanses are paved, what affect will this have on ground water storage, recharge, and local flooding? How does the developer intend to handle water detention and prevent downstream flooding impacts or other water related problems? **I93-56**
- More and more ground water is being consumed! Water tables are dropping because they are being tapped into by the big developers and causing shortages for the surrounding communities. What is the plan for Placer County to address this problem with respect to the project and it's surrounding community? **I93-57**

VI. School Districts

- The surrounding school districts cannot accommodate the increased number of students which would exist as a result of the project. The EIR and project planners should examine the potential for providing an elementary school on-site or how the funds will be provided to the existing school districts (currently operating at 107%, 106% and 143% of capacity) to accommodate the increase in school age children. **I93-58**
- How will the project impact the school districts. If the school's are currently at capacity, how will the additional 300-400 children be accommodated? Who will pay for the additional teachers, classrooms, etc. Penryn school district is estimated to need over $6,000,000 in improvements. How will this money be raised? **I93-59**
- The safety of Penryn Elementary School Children is at great risk. There is an increased visibility of children to unwanted adults. Additional children will be walking and biking. There will be an increased number of vehicles using English Colony as short cut to Taylor Road and Highway 80. There will be an increased number of vehicles dropping off students into Penryn Elementary School and an increase of potential traffic violators such as speeding and not adhering to posted signs and children playing in the area. There is an increased potential for vandalism due to population growth and exposure of Penryn residences and surrounding communities. **I93-60**
- If the project doesn't collect enough funds to provide for the educational needs of the proposed new students, will the taxpayers have to pay additional school taxes if the developers don't cover the costs? **I93-61**

VII. Public Areas

- The EIR should communicate the developer's contribution to the construction of the equestrian center, public parks and trails. | I93-62
- The developer should also identify how long the public areas will remain available to the public for use, as well as communicate any plans to make the parks and public places private once the development is complete. | I93-63
- It is clear that the developers are attempting to incorporate many positive elements into their planning, such as a high percentage of open space and recreating areas available for the community at large. When will these improvements be phased in? | I93-64
- What is the GUARANTEE that these public areas will always remain public and available to the community? What are the plans to close the project off as a gated community once it is completed??? | I93-65
- Golf courses are in abundance in this area and provide very marginal wildlife values and recreation for a very small percentage of the community. Additionally, golf courses tend to rely upon and draw in even more outside traffic. Will this be another private club, or public? How will all the toxic chemicals required to fertilize the golf courses be handled and how will the aquifer and "downstream" residents be protected? | I93-66 | I93-67
- How will horses, bikers and pedestrians share the same trails? | I93-68
- What is the FUTURE GUARANTEE of the open places? Currently 44% of the site is preserved. What will be preserved in 5 years? in 10 years? What is the guarantee that these areas won't be developed at a future date? | I93-69

VIII. Political Contributions/Miscellaneous

- The people of the towns of Lincoln, Newcastle, Loomis and Penryn have the right to expect their public officers to keep them informed of any political campaign contributions with respect to the proposed Bickford Ranch Project. Campaign contributions are a VERY SIGNIFICANT aspect of this project and a factor that the public has a right to know about. Decisions of this magnitude should be made carefully weighing all the facts. Let us please be responsible in our decision with respect to this project. The proposed development is an urban project out of place.
- This giant project including so many school, fire, police and other public jurisdictions will create tremendous new demands for public services. Will services to existing property owners be reduced because of the demands from this development? What assurances do the present taxpayers of Placer County have that this development will not result in a net increase in property taxes? **I93-70**
- What will be the impact on the property values in the Lincoln, Penryn, Newcastle and Loomis areas and surrounding communities? **I93-71**
- Growth should be steered to the cities in Placer County. This project is not within the city limits. How many residents outside of the City of Lincoln are in favor of the project versus opposing it? **I93-72**
- What are the emergency plans for the new development in case of an earthquake? **I93-73**

Members of the Placer County Planning Commission:
Noe Fieros
Larry Sevison
Judith Creek
Ken Denio
James Forman
Gerald Brentnall, and
Ronald Colemanand

and

Members of the Placer County Board of Supervisors:
Robert Weygandt
Harriet White
James Williams
Bill Santucci and
Rex Bloomfield,

We beseech you to represent the residents of the community you serve in. Think of the cumulative effects of projects such as Twelve Bridges, Stoneridge as well as Bickford Ranch. Once areas are divided into small lots, we cannot reverse the building that takes place, so it is critical to plan carefully for growth.

New developments must be consistent with adjacent land use and the impacts of each project must be considered cumulatively. In future years, areas can be split when services are adequate, but overbuilding now could lead to drastically affecting our future in this basin.

Thank you for hearing our issues and concerns. Please remember the families and children your decision will affect. The decision to move forward with this project will **forever** alter what we currently enjoy, a tranquil, rural agricultural community.

This proposed project will in NO WAY improve the quality of life for property owners and voters of Placer County.

	Name	Address	
	Doris & Ernie Dobkins	2920 Sage Lane, Lincoln	dorisd@jps.net
	Kathy + Paul Copley	3540 Rattlesnake Rd Newcastle	PKTJCOPLEY@C.S.com
21-580-036	Colleen M Carter	2410 Sunnyoaks Dr. Lincoln, CA	
	Chris Guertin	7490 Orange Ave Lincoln, CA	Guertfrm@yahoo.com
026-250-049	Paula Mulbury	6295 Mt Vernon Rd Auburn CA	pmulbury@hiscs.org
	Laurie Meyer	7440 Valley Rd. Lincoln CA 95648	Meyerpet@hiscs.org
	Rudi Munoz	P.O. Box 656 Lincoln Ca 95648	pmmm

This page intentionally left blank.

RESPONSE TO COMMENT LETTER I93

Response I93-1: See Master Response V-3 for additional mitigation recommended in this FEIR.

Response I93-2: See Master Responses GW-2, SW-1 and SWQ-1.

Response I93-3: Lots near Clark Tunnel are located within the R-17 and R-18 residential areas. As described in Section 3.5.5 of the DEIR under the subheading Soil Protection and Grading, these areas would be built on non-graded lots. Limited grading for the golf course is proposed in the area by the tunnel, and only minimal grading to improve the proposed roadway over the tunnel would be necessary. Therefore, grading would not affect the stability of Clark Tunnel.

Response I93-4: See Master Response GW-3.

Response I93-5: These issues were evaluated in the DEIR. Air quality impacts associated with project construction are discussed in Impact A-1 (pages 8-9 through 8-11) of the DEIR. Air quality impacts associated with additional fireplaces and mobile sources (vehicular and truck traffic) are discussed in Impacts A-2 and A-3 (pages 8-11 through 8-16) of the DEIR.

Response I93-6: The commentor is referred to Mitigation Measure B-A on pages 13-48 and 13-49 of the DEIR, which describes the Applicant's oak revegetation plan. See also Master Response B-6, which reiterates that the DEIR has found the oak impact to be significant and unavoidable.

Response I93-7: See Response I57-7.

Response I93-8: See Response I4-211.

Response I93-9: The survival rate of transplanted oaks as compared to naturally seeded oaks may be lower. However, studies comparing the growth of planted acorns to planted seedlings have been conducted under controlled conditions, not in natural conditions such as found in the proposed mitigation area. Acorns exhibit better initial tap root growth than seedlings, but seedlings may have advantages over acorns. Acorns must be planted correctly at the appropriate time of year for maximum survival, and they are also more susceptible to herbivory where acorn-eating rodents are present. It should also be noted that the oak mitigation seedlings will be grown from acorns collected from the transplant site. The oak mitigation seedlings, therefore, will be genetically related to on-site oaks, which are presumably adapted to the site conditions.

The most important factor in seedling growth, however, is in how the plants are maintained. Seedlings need to be given sufficient water to develop deep root growth that will reach a water supply to sustain the tree without irrigation. They also require weed removal to prevent overshading.

The Applicant is responsible for implementing the revegetation plan as part of the overall Bickford Ranch Specific Plan. As stated in Mitigation Measure B-A (as revised in this FEIR), the irrigation of the planted trees will be for a three-year period, or longer if necessary to achieve the 80 percent success ratio.

See also Response I4-217.

Response I93-10: See Master Responses B-6 and B-7.

Response I93-11: See Response I4-132.

Response I93-12: Comment noted.

Response I93-13: Noise impacts associated with project-generated traffic are discussed in Impact N-3 (pages 9-9 through 9-10) of the DEIR. The DEIR concludes in this section that noise level increases associated with proposed project traffic would be less than significant. The proposed project would contribute, however, to a cumulative noise impact. This impact is discussed in Section 16.5 (pages 16-109 and 16-110) of the DEIR. See also Response I74-8.

Response I93-14: The DEIR identifies several significant impacts on wildlife habitat due to project construction (see Impacts B-3 through B-13 on pages 13-29 through 13-37 of the DEIR). Please note, however, the update and clarification to Impact B-9 on pages 13-33 and 13-34 (loss of California red-legged frog habitat) in Master Response B-19. Impact B-2 on pages 13-28 and 13-29 identifies the significant and unavoidable impact due to loss of oaks and other native trees. Although loss of grassland would also affect wildlife, Impact B-1 on pages 13-27 and 13-28 concludes that the loss is less than significant due to the regional abundance of this habitat type. Also see Response I4-169 for a discussion of the wildlife habitat value and loss of annual grassland.

Response I93-15: The proposed project is not expected to have a significant effect on the amount of water currently available to existing trees. No significant impacts on availability of groundwater were identified in the Hydrology and Water Quality chapter of the DEIR (Chapter 12).

Response I93-16: The DEIR identifies significant and potentially significant impacts to wildlife habitat and wetlands that could result from changes in runoff patterns due to the project (see Impacts B-17 through B-19 on pages 13-38 through 13-41 of the DEIR). To reduce these impacts to a less-than-significant level, as well as avoiding potential impacts to riparian vegetation, including trees, the DEIR includes Mitigation Measure B-R on page 13-57 (Avoid removal of blackberry riparian vegetation); Mitigation Measure HW-F on page 11-12 (Finalize and implement the Applicant's Golf Course Chemical Application Management Plan); Mitigation Measure H-A on page 12-22 (Prepare and implement a post-development Storm Water Management Program); Mitigation Measure H-F on page 12-24 (Monitor site erosion and sediment control measures for two years after implementation final erosion control measures); Mitigation Measure H-G on page 12-24 (Design runoff retention basins to promote solids settling and provide capacity for accumulated sediment); and Mitigation Measure H-H on page 12-24 (Finalize and implement the Applicant's Lake Management Plan for constructed lakes and wetlands). Master Response B-14 further clarifies Mitigation Measure B-R and the level of protection for riparian areas during construction and fire prevention.

Studies completed in the project area have assessed the types of species present (see Master Responses B-1 and B-2 regarding special-status species surveys). Surveys for the valley elderberry longhorn beetle have also estimated the number of habitat locations (elderberry shrubs) present on site because these data are necessary to determine the level of mitigation required (see Response I5-11). However, additional surveys to evaluate the numbers of each species present are generally beyond the scope of a CEQA analysis. The surveys conducted in the project area or proposed to be conducted are adequate to identify the significant impacts and develop appropriate mitigation. Most of the wildlife mitigation is based on the acreage of habitat affected, not the numbers of individuals affected.

Response I93-17: See Response I4-248, and Mitigation Measure C-E on page 14-19 of the DEIR.

Response I93-18: This was addressed in the DEIR. For example, see Impact T-10. Tables 7-8, 7-11, and 7-13 present the traffic volumes on English Colony Way with and without the project, as well as the resultant roadway levels of service. See also Master Responses T-4, T-5, and T-6.

Response I93-19: Clark Tunnel Road is suitable for emergency vehicle access at both the northern and southern boundaries and to the east of the tunnel.

Response I93-20: See Master Response T-1.

Response I93-21: See Response I85-114.

Response I93-22: There is no "official" alternate route in the case of closure of Sierra College Boulevard, with or without the proposed project. Traffic will divert to a variety of other nearby roadways. The particular alternate route to be chosen depends upon the specific location of the roadway closure. The project provides multiple access points to Sierra College Boulevard, as well as additional emergency access points.

Response I93-23: Based upon existing traffic counts, level of service calculations, and field observations, the intersection of Sierra College Boulevard and SR 193 is not currently congested. Please refer to Table 7-4 on page 7-5 of the DEIR. Traffic signals improve intersection operating conditions by efficiently allocating right-of-way between conflicting traffic movements. See Response I85-110.

Response I93-24: See Response I88-7 and Master Response T-1.

Response I93-25: The commentor expresses the opinion that "any stop signs or lights along Sierra College Boulevard are ludicrous and suicidal." There are currently intersections with stop sign and traffic signal control along Sierra College Boulevard that have not exhibited unusual or unexpected safety problems. Any new traffic control devices will be designed to meet all applicable federal, state, and county design standards. Regarding the widening of Sierra College Boulevard, see Master Response T-1.

Response I93-26: See Response I34-2.

Response I93-27: The trips described by the commentor have been taken into account in the DEIR's traffic analysis.

Response I93-28: See Master Response T-1. The DEIR addresses the traffic congestion issues during construction in Impact T-1 on pages 7-12 and 7-13 of the DEIR. Two mitigation measures are recommended. Mitigation Measure T-A requires the Applicant to prepare and implement construction management plans for on-site construction activities for Bickford Ranch Road and Sierra College Boulevard, and to coordinate with appropriate agencies in the preparation and implementation of construction traffic management plans for required off-site improvements. These plans will consider restricting the hours of one-way traffic control as well as construction scheduling to facilitate traffic flow through construction areas. Mitigation Measure T-B requires the Applicant to implement a community relations program during on-site construction, and to coordinate with appropriate agencies in the implementation of a community relations program during construction of required on-site and off-site improvements. By notifying the community in advance, drivers can take steps to avoid construction areas during periods of intense activity. These mitigation measures are described in more detail on page 7-38 of the DEIR.

Response I93-29: Existing traffic operating conditions at study area roadways and intersections are documented in Tables 7-4 and 7-5 of the DEIR. Regarding timing of traffic improvements, see Master Response T-1.

Response I93-30: See Master Response T-4.

Response I93-31: The DEIR addresses project-related congestion on roadways that would be substantially affected by the project. This includes roadways in the foothill communities and in the Sacramento Metropolitan area. See Tables 7-4 and 7-5 for a list of existing roadways that are included in the DEIR analysis. Impact T-11 specifically addresses the nearby freeway system.

Response I93-32: Comment noted. See Response I34-2.

Response I93-33: The commentor refers to "commercial area residential volume." It is unclear what this refers to. However, commercial vehicle trips were included in the Bickford Ranch trip generation, shown on Table 7-6 on page 7-10 of the DEIR.

Response I93-34: The project does not include access via Clark Tunnel Road. Therefore, traffic volume increases on Clark Tunnel Road, Butler Road, and Gold Rush Way are expected to be minimal. The DEIR alternatives that include access to Clark Tunnel Road to the south (Sub-Alternatives 5-1 and 5-2) concluded that substantial improvements along Clark Tunnel Road would be required due to safety issues. If either of these alternatives were approved, specific improvement plans would have to be developed and implemented, as identified in the DEIR. See also Response I2-15.

Regarding English Colony Way, see Master Response T-6.

Response I93-35: See Response I93-31 and Master Response T-4.

Response I93-36: With the implementation of the transportation mitigation measures outlined in the DEIR, acceptable roadway operating conditions will exist on the area roadways and intersections. With these conditions, no undue delays to emergency vehicles should result.

Response I93-37: See Response I93-22. Clark Tunnel Road would remain closed at the proposed project boundaries and open inside of the proposed project boundaries. Emergency access at both the northern and southern project boundaries would be by a gate with a locking mechanism.

Response I93-38: The DEIR transportation analysis did not expect or include any substantial traffic volume reduction from the provision of the park-and-ride lot.

Response I93-39: See Master Responses GW-1 and GW-2.

Response I93-40: The proposed project would result in increases in regional and local pollutant emissions. The proposed project was found to result in a significant regional air quality impact individually and in conjunction with cumulative development in the region. Mitigation measures were identified to reduce the project-specific impact to a less-than-significant level; however, the project's contribution to cumulative air quality issues was determined to be a significant, unavoidable, adverse impact.

See Master Responses A-1 and A-2.

Response I93-41: See Master Responses GW-1 and GW-2.

Response I93-42: See Master Responses GW-1 and GW-2.

Response I93-43: See Response I93-40 and Master Responses A-1 and A-2.

Response I93-44: Mitigation Measures A-E through A-J have been incorporated into the proposed project to reduce project-generated air quality impacts. In addition, Mitigation Measures A-K and A-L are recommended for implementation to further reduce project-generated regional air quality impacts.

These mitigation measures are described in detail on pages 8-20 through 8-22 of the DEIR, and are also discussed in Master Response A-2. See especially the discussion of the Applicant's proposal to modify Mitigation Measure A-K by committing to increased mitigation to mitigate long-term pollutant emissions.

Response I93-45: See Master Response A-1.

Response I93-46: The commentor is correct in noting that the proposed project is inconsistent with the goals of the Air Quality Attainment Plan. This impact is considered to be significant and unavoidable despite implementation of all feasible mitigation measures, and is discussed in Impact A-4 (page 8-16) of the DEIR. See also Master Response A-3.

Response I93-47: The issue of existing wells running dry is discussed in Impacts PS-3 and H-8 in the DEIR. Based upon the available data, it appears that use of domestic wells for a limited number of parcels would be feasible and that the projected demand from a limited number of wells would represent a less-than-significant impact. The issue of contamination of well water as a result of the project is discussed in Master Responses GW-1, GW-2, GW-3, GW-5, and SWQ-1. Since most of the potable water for the project would not rely on wells, there should be no impact on water availability for local wells as a result of the project. The potential for the proposed project to affect groundwater is discussed on pages 12-16 through 12-19 of the DEIR, and it is concluded that, with mitigation, impacts to groundwater quality or recharge opportunities would not be significant. See Response I85-16 regarding responsibility for groundwater contamination.

Response I93-48: The costs to extend the "wet" utilities to the site would be paid by the Applicant. For "dry" utilities (i.e., PG&E) the Applicant and/or the utility provider would pay for the extension costs. The costs of extending sewer and water to the site would be financed through the Mello-Roos District. The bonds would be paid back by the property owners of Bickford Ranch through a special assessment. Hook-up fees for all utilities and water and sewer service would be paid by the Applicant. Each homeowner in the proposed project would be obligated to pay the then current utility and/or water fees. It is unknown at this time whether any of the public or private utility companies would raise their utility fees, and such an analysis would be speculative. However, any change in rates must comply with applicable state law requirements to provide notice to homeowners and to release information about rate changes so that affected persons can review and comment on rate changes.

Response I93-49: See Master Response SS-1.

Response I93-50: The County has reviewed the fiscal analysis prepared for the proposed project (EPS, 1999), and concurred with the conclusions that the tax revenue generated by the proposed project would be sufficient to fund the requisite additional County services (see page 6-27), except as noted in Comment Letter C8. The fiscal analysis has been revised to address the County's concerns, as the responses to Comment Letter C8 indicate. The fiscal analysis concludes that the proposed project would not have an adverse impact on County services.

The DEIR noted that the County did not concur with the conclusions regarding criminal justice costs related to age-qualified housing units. In Comment Letter C8**,** the County reiterated this position, and also commented on other aspects of the Fiscal Study. The fiscal analysis has been revised to address the County's concern, as described in Responses to Comment Letter C8.

Response I93-51: The commentor offers no evidence to support the statement that increased radio waves will affect the surrounding areas. Areas with much more congestion than that proposed experience no effects from increased radio waves.

Response I93-52: See Response I93-48. The County would condition the project to require the developers to cover the entire cost of extension of all infrastructure and wet utilities needed to serve the project. The cost of extending dry utilities to the site is generally paid for by the utility provider. At the time final maps are recorded, the County requires the developer to post security bonds to guarantee that

sufficient financing is available and secured to complete the infrastructure improvements needed to serve the subdivision development.

Response I93-53: See Master Response SW-1.

Response I93-54: See Master Responses GW-1, GW-2, GW-3, GW-4, and SWQ-1.

Response I93-55: The canal will be supplied and maintained by PCWA as necessary to satisfy the existing service agreements. See also Master Response WS-1, No. 3. PCWA will not approve any agreement for service that would impact the status of existing agreements.

Response I93-56: Potable water to serve the development would be conveyed through the off-site water delivery system described in Section 3.5.7 of the DEIR, which includes a new storage tank on site. PCWA is planning a new raw water reservoir on the Bickford Ranch site as part of a separate project; this reservoir would be sized to meet the capacity of the proposed project and other water users as part of PCWA's raw water delivery system. This is also described in Section 3.5.7 of the DEIR. These storage reservoirs have the capacity to meet the water/sewer needs of the proposed project. See Master Response I3-26 regarding domestic wells.

The estimated treated water demand by phase is shown in Table 6-1 on page 6-13 of the DEIR, the estimated raw water demand is shown in Table 6-2 on page 6-14, and the estimated wastewater treatment demand is shown in Table 6-3 on page 6-19. The average water demand used by PCWA is 1,150 gallons of potable water per household per day. The average wastewater calculated usage is 252 gallons per day for a conventional unit and 189 gallons per day for an age-restricted unit.

The project is located within the Sacramento Valley Groundwater Basin. Recharge of the basin occurs through infiltration of stream flow that originates in the mountain areas contiguous to the basin and by deep percolation of precipitation where soil and geologic conditions are favorable. Approximately 271 acres of the project site would be developed to accommodate residential, commercial and service uses and interior roadways, which would result in the creation of impervious surfaces and reduce the potential area available for infiltration. However, the recharge potential of the site is already limited. This is discussed in the DEIR in Section 12.1.2 on pages 12-4 and 12-5 and in Section 12.3.2, Impact H-8 on page 12-18. Because of geologic conditions and the predominance of low-permeability soils on approximately 75 percent of the site, downward migration of water from the surface is inhibited in those areas of the ridge where higher-density development is proposed. In lower elevation areas, where lower-density development is proposed, the soils are somewhat more permeable but infiltration would still be slow. Because of the relationship between the location of proposed impervious surfaces, existing site geologic conditions and soil cover, the proposed project would not significantly alter the recharge potential of the project site and therefore, by extension, would not affect the groundwater storage and recharge potential of the Sacramento Groundwater Basin.

The proposed project's effects on downstream flooding are discussed in Impacts H-1 (Increase in runoff rate downstream of the site) on pages 12-9 and 12-10 of the DEIR and H-2 (Increase in runoff volume leaving the site) on pages 12-10 and 12-11 of the DEIR. As described in these discussions, the potential for downstream flooding will be reduced to a less-than-significant level by the development and implementation of a Storm Water Management Plan to provide for post-development storm water management (for which the specific performance standards are identified in Mitigation Measurer H-A), construction of detention structures to reduce peak flows, and through on-site and off-site retention storage. For additional discussion of the impacts of the project relative to increased runoff rate and volume, see Master Response SW-1. For a discussion of storm water and groundwater quality impacts, see Master Response SWQ-1.

Response I93-57: The proposed project relies on surface water for all but eleven large lots in rural locations. As discussed on page 16-106 of the DEIR, Placer County General Plan policy encourages the use of surface water supply for new developments. Additional future demand on local groundwater resources will be limited to rural development with low population densities where safe and reliably adequate supply can be demonstrated. The DEIR concludes that if the General Plan policies are carried through to future development, cumulative impacts to groundwater supply would be less than significant. See also Response I3-26.

Response I93-58: See Master Responses S-1 and S-3. The capacity percentages are noted and are consistent with the DEIR.

Response I93-59: See Master Response S-1. As described in the discussion of Impact PS-23 on pages 6-27 and 6-28 of the DEIR, payment of statutory fees would eventually mitigate impacts associated with demand for new schools attributable to the project in the long run, but the DEIR acknowledges that this may not provide enough funding to practically address this impact in the short term. The $6.4 million in facility funding referred to by the commentor is identified in the Penryn School District Facility Master Plan. This amount is the total need for the Penryn School District. It is not solely attributable to the proposed project, although the Bickford Ranch development was considered in the projections.

Response I93-60: See Master Response T-3 regarding the traffic impacts around schools, and Mitigation Measure T-H regarding improvements to English Colony Way. The potential for vandalism exists as population increases; the Bickford Ranch site was identified as a growth area in the Placer County General Plan. See Master Response GP-1.

Response I93-61: See Master Response S-1. The Applicant will pay the statutory fees to the extent required by law to mitigate school impacts resulting from the proposed project. School levies and bonds to raise funds for facilities are at the discretion of the districts and the electorate. The statutory fees and the additional property tax revenue from the proposed project would contribute to providing funds for educational needs of the proposed new students.

Response I93-62: An equestrian center is no longer proposed as part of the Bickford Ranch Park, although an equestrian staging area would be provided. Funding for the parks and trails is to be provided by the Applicant. The Applicant now proposes to construct the park facilities identified in the new park plans, shown on Revised Figures 3-9 and 3-10 in Chapter 2 of this FEIR. The facilities would be constructed in phases based on the phased construction of homes in the project. The first portion of Bickford Ranch Park that is proposed for construction is those facilities located just north of the fire station and south of the lakes. The Applicant proposes construction of these facilities upon the issuance of the 500th building permit for a residential dwelling unit. The area of Bickford Ranch Park that is located to the west of the proposed school site will be constructed when the school site is constructed. If the school site is not acquired by a school district and the site reverts to the underlying lots, the Applicant proposes to construct this portion of the park upon the issuance of the 1,000th building permit for a residential unit. Tower Park facilities would be constructed upon the issuance of the 1,500th building permit for a residential unit. The Applicant would clear and sign the wilderness equestrian and pedestrian trails. Equestrian, pedestrian and separated bike trails along major streets would be constructed by the Applicant. Class II bicycle lanes would be striped on streets by the Applicant as the streets are constructed. The trails would also be constructed by the Applicant and phased with the three phases of the development. The Applicant proposes to donate the land for the parks to the County, and to apply the park improvement fees to construction of the facilities. See Master Response PR-2.

Response I93-63: The public roadways are Bickford Ranch Road and Lower Ranch Road. These roadways would be dedicated to the County and would be owned by the County. See Master Response PR-1 regarding revised parks and recreational facilities. Those facilities shown as public are intended to

remain so, with the potential exception of the golf course which may become private in the future. See also Response I93-65.

Response I93-64: See Response I74-6.

Response I93-65: Natural open space, trails and community parks are proposed to be dedicated to the County and these areas and facilities would remain in public ownership. The County staff has indicated that the County would accept community park sites but that the trails in the open space areas would be dedicated as public easements. In this scenario, both the parks and the easements would be maintained by the County (Ramirez, 2000). Proposed gates for the project are shown on Revised Figure 3-11. No additional gates are planned. See Response I93-63. Public roadways will not be gated; however, vehicular access will be limited where gates are shown at the entrance to individual neighborhoods. Mitigation Measure L-C requires that construction of gates be limited.

Response I93-66: As identified in the DEIR on page 3-9 and Table 6-6 (Note 1), the golf course will initially be a public facility; however it may revert to a private facility at some unknown time in the future. As described in Response I93-63, this decision would be made by the Homeowners Association. Additional public traffic as a result of the golf course was assumed to be minimal at peak traffic periods and was not specifically included in the traffic analysis in the DEIR.

Response I93-67: See Master Response GW-1.

Response I93-68: The Applicant does not propose that horses, bikers, and pedestrians would share the same trails. See Master Response PR-2 and Revised Figure 3-9 showing the revised trail system. County staff has indicated, however, that they will recommend that the public trails be multiple use.

Response I93-69: See Response I74-6. The public open spaces are proposed to be dedicated to the County. The County will ensure that the areas remain as open space through the designation of these areas as open space on the Specific Plan Land Use Diagram. Once the land is dedicated to the County, the County cannot subsequently sell it unless it makes the required statutory findings that the land is surplus. Also note that uses of designated "open space" are restricted and limited to those identified in the General Plan as compatible with open space. These are limited to passive recreational uses. Any subsequent change in use that the County may propose as the owner of the open space would be subject to subsequent environmental review.

Please note that 47.5 percent of the project site is defined as open space/recreation, and includes areas that would include developed recreational facilities such as parks, a clubhouse/recreation center, a driving range, and a golf course. Natural open space and open space corridors make up 27 percent of the project site. The acreage for each element making up the 47.5 percent referred to by the comment is identified on Revised Table 3-1 in Chapter 2 of this FEIR.

Response I93-70: Placer County staff have reviewed the revised fiscal analysis of the project included as Appendix D of this FEIR, and have concluded that the tax revenue generated by the proposed project would be sufficient to fund the required services. See Response I93-50.

Response I93-71: Area property value impacts were not analyzed in the DEIR. In areas such as Lincoln, Loomis, Rocklin and Roseville, housing costs have decreased since 1990. It is possible that the area could experience a slight increase in surrounding property values due to the recreational amenities included in the proposed project.

Response I93-72: See Master Response GP-1 regarding the selection of the Bickford Ranch area as a potential growth area for south Placer County. It is not known how many residents outside of the City of

Lincoln are in favor the project versus opposing it. See Master Response DEIR-3 regarding the project approval process.

Response I93-73: Earthquake and emergency preparedness plans for residents and properties in the proposed project would conform to the plans and procedures of the Placer County Office of Emergency Services. No specific earthquake plan would be written for the proposed project, but Placer County standards, rules, plans and emergency procedures would apply.

The Placer County Office of Emergency Services coordinates the operation of all governmental and non-governmental forces before, during and after emergencies. The Office plans for government's response to emergencies and regularly tests the systems through emergency simulations. In addition, the Office helps residents and community agencies develop emergency preparedness skills and capabilities and trains emergency responders. The Office maintains two emergency operations centers, public information plans, and damage assessment and recovery procedures. An earthquake emergency is one type of hazard that is covered by the emergency procedures and plans in Placer County.

In addition, it should be noted that the probability of an earthquake in the area where the proposed project would be built is low compared to other areas in northern/central California, according to the Placer County Office of Emergency Services and as described in Section 10.1.4 of the DEIR.

This page intentionally left blank.

PLACER COUNTY
DATE
RECEIVED

NOV 01 1999

PLANNING DEPARTMENT

October 20, 1999

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

Dear Ms. Langford:

At the Penryn MAC meeting on September 28, 1999, the issue of whether or not Clark Tunnel Road would be closed was discussed several times. The representative for the Applicant stated that it was proposed to close it. Wes Zicker of Public Works made it clear that that was just a proposal. The Board of Supervisors would have to vote on it. So, there is no guarantee that if the Bickford Ranch development goes through, Clark Tunnel Road will be closed.

We live off of Clark Tunnel Road on Gold Rush Way, which is a semi-private road, along with the two courts off if it, Frontier and Prairie. It is a popular "short cut" for parents who live on Clark Tunnel and drive their children to Penryn School. If even 10 additional cars traffic Gold Rush on a consistent basis, our road will not hold up to the usage. Even though it was supposed to have been put in to County standards originally, it is nothing more than a chip/seal on top of a thin road base.

Roughly a year ago, a traffic study was done and provided to Wes Zicker for perusal. While nothing was done with it officially, it did show that between 30-50 percent of the road traffic on Gold Rush was non-resident. The numbers varied, depending on whether rural/urban daily trip guidelines was used. If that figure increases, Gold Rush will just disintegrate. Will the County and/or the Applicant for the development of Bickford Ranch be responsible for repairs and/or maintenance of Gold Rush Way if Clark Tunnel Road remains open? We the residents cannot be held responsible for a road that is no longer semi-private. I94-1

We would appreciate you attention to this matter.

Sincerely,

Signed: Christopher Dobb — Printed: CHRISTOPHER DOBB

Address: 1290 Gold Rush Way, Penryn, CA 95663

Signed: _____ Printed: _____

Address: 1300 Gold Rush Way, Penryn, CA 95663

Signed: James L Foster Jr — Printed: JAMES L FOSTER JR

Address: 1310 Gold Rush Way, Penryn, CA 95663

Signed: Terry L Chambers — Printed: Terry L. Chambers

Address: 1420 Gold Rush Way, Penryn, CA 95663

Signed: Bonnie R. Reed — Printed: Bonnie Reed

Address: P.O. Box 428 Penryn, CA 95663

Signed: Garth Gaylord — Printed: GARTH GAYLORD

Address: 1560 Gold Rush Way, Penryn, CA 95663

Signed: Elizabeth J. Chapman
Printed: Elizabeth Chapman
Address: P.O. Box 233 Penryn, CA 95663

Signed: Carroll J. Bravo
Printed: CARROLL J. BRAVO
Address: P.O. Box ~~206~~ 253 Penryn, CA 95663

Signed: Edward D McMullin
Printed: EDWARD D MCMULLIN
Address: 16~~73~~ 10 Gold Rush Way Penryn, CA 95663

Signed: Judith L Gauthreaux
Printed: Judith L. Gauthreaux
Address: ~~1733~~ 1673 Gold Rush Way Penryn, CA 95663

Signed: William Terry
Printed: WILLIAM TERRY
Address: P.O. Box 91 Penryn, CA 95663

Signed: D. Benjamin Fairall
Printed: D. BENJAMIN FAIRALL
Address: 1633 Gold Rush Way, Penryn, CA 95663

Signed: _____
Printed: _____
Address: 6870 Prairie Court, Penryn, CA 95663
(mailing: 5923 Our Way, Citrus Heights, CA 95610)

Signed: [illegible]
Printed: Leroy E. Christensen
Address: 6875 Prairie Ct. Penryn, CA 95663

Signed: Dorothy Schultz
Printed: DOROTHY P. SCHULTZ
Address: P.O. Box 147 Penryn, CA 95663

Signed: _____
Printed _____
Address: 1295 Gold Rush Way Penryn, CA 95663

Signed: Vernon R. Stubbs
Printed: VERNON R. STUBBS
Address: 1418 Frontier Ct. Penryn, CA 95663

Signed: [illegible]
Printed: HELMUT F. HEINRICHS
Address: 6925 Prairie Ct. Penryn, CA 95663

Signed: Judy Teng
Printed: Judy Teng
Address: 6980 Prairie Ct. Penryn, CA 95663

Signed: _____
Printed: _____

Address: 6940 Prairie Ct. Penryn, CA 95663

Signed: Vicki Price

Printed: Vicki Price

Address: P.O. Box 153 Penryn, CA 95663

John B Price

JOHN B PRICE

Alice Couriq
1733 Goldrush Way

ALICE COURIQ

SIGNED Daniel Couriq
1733 GOLDRUSH WY

PRINTED DANIEL COURIQ

SIGNED Margit K. Lawrence
1360 Clark Tunnel 663-3754
Penryn, CA 95663

PRINTED Margit K. Lawrence

SIGNED Curtis C. Miller
1618 Batken Rd
PENRYN, CA 95747

CURTIS C MILLER

SIGNED	PRINTED	ADDRESS
Richard B. Chapman	Richard B. Chapman	Box 233, Penryn, CA 95663
Marie Terry	MARIE TERRY	1653 Gold Rush Way
Donna J. McMullin	Donna J. McMullin	1610 Gold Rush Way Penryn Ca 95663
Grete Heinrichs	Grete L. Heinrichs	6925 Prairie Cou.
Pat M. Stubbs	Pat M. Stubbs	1418 Frontier Court Penryn Ca
Priscilla L. Bravo	Priscilla L. Bravo	1470 Gold Rush Wy Penryn Ca

RESPONSE TO COMMENT LETTER I94

Response I94-1: See Response I19-2.

This page intentionally left blank.

COMMENT LETTER I95

May 24, 1999

RW 6/2/99
g

ENTERED
TM
P/TS

Robert Weygandt
175 Fulweiler Ave.
Auburn, CA 95603

Dear Robert Weygandt,

I'm writing you this letter because I believe the safety of many Penryn residents is at risk if the 4000+ drivers of Bickford Ranch are allowed to choose the Clark Tunnel route to the freeway instead of the Sierra College route. I need your help to assure that this doesn't happen. I propose the County maintained road end and a gate be placed approximately where the pavement of Clark Tunnel Road ends today, after the turn-out to the last home currently located on the ridge. Ending the County maintained road at this location is the only legal way a gate could be installed and an "emergency use only" sign posted on both sides of the gate. Here are some of the reasons I feel that this is our only choice: I95-1

1. Clark Tunnel Road is a winding, narrow country road measuring only 14 to 16 feet wide in many places and with many blind curves, dips, and hills. There are no center lines, no shoulders, and no separate pedestrian paths. Joggers, walkers, bicyclists, horseback riders and approximately 100 to 150 drivers, currently share this road. If the number of drivers were to increase by as little as a few hundred, Clark Tunnel Road would surely become a death trap.

2. If allowed, I predict that at least 30% to 40% (1200 to 1600 drivers) of the Bickford Ranch drivers will choose the Clark Tunnel route to the freeway because it will be the quicker route. From the top of the ridge near the tower, to the freeway, via Clark Tunnel is four miles. From the Caperton intersection on Sierra College to the freeway is five miles. Add on the 2-3 miles of road within Bickford ranch and you have 50% of the residents choosing between a 4-5 mile Clark Tunnel route, without lights, and a 7-8 mile Sierra College route, with 4-6 traffic lights. The choice will be simple, many of the residents, if allowed, will choose the shorter Clark Tunnel route.

3. The developers of Bickford Ranch clearly understand the importance of separating pedestrians from cars. Their plan includes separated traffic lanes, bike lanes, and completely separate pedestrian paths. If Clark Tunnel road continues to provide public access from the project to the Loomis Basin then the quality of life for many Penryn residents will be destroyed. We will no longer be able to walk or bicycle or drive Clark Tunnel road without fearing for the safety of ourselves and others.

Laurie L. Richards
7095 Allen Ln.
Penryn, CA 95663-9689

RECEIVED
MAY 26 1999
BOARD OF SUPERVISORS

4. It would be almost impossible and fiscally unfeasible to widen most of Clark Tunnel road. For example, at locations between mile three and four (from English Colony), the road winds its way up the ridge with the PCWA irrigation ditch to the uphill side and a 30-50 foot drop-off to the downhill side.

My current understanding after talking with Bob Hayes is that the developers would prefer to completely close Clark Tunnel Road at the top of the ridge, but that the Department of Public Works is opposed to this. I understand and respect a policy that does not generally allow the closing of existing County roads, but in this case I feel that it is absolutely essential that the Board of Supervisors make an exception and close the road to through traffic.

I have only lived at my current residence on Allen Lane for three months and therefore did not attend any of the public meetings concerning the Bickford Ranch project. However, from my conversations with various people I have learned of a petition asking that Clark Tunnel Road be closed to through traffic and from access to the Bickford Ranch property. I have included a copy of this petition for your review.

I want to thank you in advance for your assistance in this matter and I look forward to hearing from you or your assistant in the near future. Susan, your assistant has been extremely helpful and I want to thank her for getting me in contact with the Penryn MAC and Bob Hayes. I truly believe that after all of the facts are reviewed, the County will choose to close Clark Tunnel Road to through traffic and access to Bickford Ranch.

Sincerely,

Laurie L. Richards

RESPONSE TO COMMENT LETTER I95

Response I95-1: The commentor's preference for closure of Clark Tunnel Road to the south is noted. The Applicant proposes to close Clark Tunnel Road at the northern and southern project boundaries. The DEIR analyzes the effects of Clark Tunnel Road remaining open to the south (sub-alternative ~~5~~2 in Chapter 16) and concludes that the traffic, noise, and visual quality impacts would be worse than the Applicant's proposal to close it. See Master Response DEIR-3 for a discussion of the approval process.

This page intentionally left blank.

22 SEPTEMBER '98
PAGE 1 of 4

Placer County Planning Department
11414 "B" Avenue
Auburn, Ca. 95603
Attn: Loren Clark-Senior Planner

COMMENT LETTER I96

While we deeply regret giving up our rural lifestyle, the residential planning of the Bickford Ranch makes so much sense! Rather than take prime agricultural land out of production, we use this marginal land for residential construction.

However, any access to Clark Tunnel Road by the Bickford development would be a mistake! This road is a narrow winding country lane with limited visibility. A Penryn fire truck rolled over the edge due to the sharp curves and the C.H.P will not allow a school bus to ascend this road form the intersection of Allen Lane to the summit. Not only does local traffic take up much of the road; access of heavy equipment will use up most of the road and pose a threat to the otherwise normal local traffic. I96-1

Many of the nearby residents, including children, use this road for walking, bike riding, and horseback riding and they do not need additional traffic to contend with, especially with many blind curves. It is also difficult to ascend or descend this road in early morning or late afternoon because sun angles practically blind one when driving.

Again, it is desired to close Clark Tunnel Road from through traffic and access to the Bickford Ranch property.

Charlie and Jill Otby 987 Clark Tunnel Rd.
Ken and Katharine Reeves 871 Clark Tunnel Rd
James + Diane Gallagos 841 Clark Tunnel Rd
John + Terry LaFave 1075 Clark Tunnel Rd.
Mary Rooke 1055 Clark Tunnel Rd
Phillip J. Rhodes 895 Clark Tunnel Rd.
Rachel Rhodes 895 Clark Tunnel Rd.

Page 2 of 4

Marika Miyamura	1092 Clark Tunnel Rd
A.C. Nippert	1275 Clark Tunnel Rd
Mildred L. Nippert	1275 Clark Tunnel Rd
Gordon G. Poulsen	1281 Clark Tunnel Rd.
Ralph P. Morgan	1215 Clark Tunnel Rd
Doris R. Morgan	1215 Clark Tunnel Rd, Penryn
John + Tassie Cooper	1185 Clark Tunnel Rd, Penryn
Mr & Mrs. Sanderson	6990 Coney Ln. Penryn
Karen + Kenny Coney	6870 Coney Lane Penryn Ca
Hilary + Ruth Teichmann	6813 Coney Lane Penryn, CA
Janet Kellman	6881 Coney Lane, Penryn, CA
Mark Kellman	6881 Coney lane, Penryn CA
Joanna Kellman	6881 Coney lane, Penryn CA
Nancy De Smet	6907 Coney Ln. Penryn, Ca.
Andrew V. De Smet	6907 Coney Lane, Penryn. Ca.
Jim and Mary Ann Meredith	986 Clark Tunnel, Penryn
Jim Meredith	986 CLARK TUNNEL RD. PENRYN, CA
Kevin Swanson + Tiffany Swanson	985 Clark Tunnel RD. Penryn, CA

Page 3 of 4

Patty and Randy Neifer	976 Clark Tunnel Rd. Penryn CA
Steve & Brenda Pitts	956 Clark Tunnel Rd. Penryn Ca
Jim + Anita Spence	1725 Clark Tunnel Rd. Penryn Ca
Terry and Cindi Callahan	1743 Clark Tunnel Rd Penryn Ca
Rose & Ken Patterson	7084 Allen Lane Penryn Ca
Earl + Pat Craft	7100 Allen Ln Penryn Ca
Gladys Stampfli	7100 Allen Ln Penryn Ca
Eric Nelson	7085 Allen Ln Penryn CA.
Lisa + Allen Tolleson	1136 Clark Tunnel Road Penryn
Ray + Judy Meeker	1165 Clark Tunnel Rd Penryn
Irene Ortiz	1710 Clark Tunnel Rd Penryn
Dennis + Yonnie Murphy	1735 Clark Tunnel Rd. Penry
Nathan + Maureen Walton	1431 Clark Tunnel Rd. Penryn,
Pat Singleton	1240 Clark Tunnel Rd, Penryn
John Stickey	1450 Clark Tunnel Rd Penryn Ca.
Julie Barbour	1375 Clark Tunnel Penryn CA
Claudia and Jerald Starkey	7175 Allen Lane Penryn, Calif.
Leah Westberg & Mark	7249 Allen Lane Penryn Ca.
Larry Lockett	7309 Allen Lane Penryn Ca
Ellen J Lockett	7407 Allen Lane Penry CA 95663
Norman & Gary Sherman	

Page 4 of 4

[illegible]	7087 ALLEN LN. PENRYN CA 9566
Kristin Setterlund	1125 Clark Tunnel Rd Penryn CA 956
[illegible] Setterlund	1125 Clark Tunnel Road Penryn
[illegible]	1301 clark Tunnel Rd Penryn, 95
Mrs Kathleen Cumm Baylis	1451 Clark Tunnel Rd Penryn 95
Laurie L. Richards	7095 Allen Lane Penryn, CA 95663
Wesley A. Dill	7095 Allen Ln Penryn, CA 95663

RESPONSE TO COMMENT LETTER I96

Response I96-1: See Response I95-1.

This page intentionally left blank.

COMMENT LETTER I97

Board of Supervisors, County of Placer
175 Fulweiler Avenue
Auburn, CA 95603

Dear Mr. Weygant, Bloomfield, Stantucci, Williams, and Ms White,

It is by means of this petition the undersigned do wish to inform the Placer County Board of Supervisors of our position concerning the possible use of Clark Tunnel Road by residents of the proposed Bickford Ranch Development into Penryn. **We, the undersigned, are property owners with some portion of our property adjoining Clark Tunnel Road to the south of the proposed development.**

First, we **strongly oppose** any use of Clark Tunnel Road by the residents of the proposed Bickford Ranch Development southward into Penryn. This portion of Clark Tunnel Road would be extremely hazardous with the substantial increase in traffic, and the rural nature of the area would be severely impacted. Should the Bickford Ranch development be approved, Clark Tunnel Road to the south of the development should be closed to all Bickford Ranch residents by means of a locked gate. **I97-1**

Second, any use of Clark Tunnel Road to the south of the proposed Bickford Ranch Development would require significant improvements to the road, with Placer County Public Works advising current requirements would dictate 32 feet of pavement surface. Currently, insufficient easement exist to widen this portion of Clark Tunnel Road without the utilization of adjacent private property. We, the undersigned **will not sell** a portion of our property for roadway easement to representatives of Bickford Ranch for the purpose of widening Clark Tunnel Road.

Third, we the undersigned, **will resist** all efforts to obtain any portion of our private properties by Placer County through "**eminent domain**" process, should that be considered as a means of acquiring roadway easements for the widening of Clark Tunnel Road to the south of the proposed Bickford Ranch development.

It is our position the rural nature of the Penryn area shall be preserved in the event of any development of immediately adjacent County of Placer open lands.

Julie Rhodes 7034 Allen Lane Penryn Ca 95663
Charlie Colby 987 CLARK TUNNEL RD PENRYN, CA, 95663
Linda Colby 987 Clark Tunnel Rd Penryn Cal. 95663
Mary J Roche 1055 Clark Tunnel Rd. Penryn CA 95663
Erry LaFave 1075 Clark Tunnel Rd Penryn CA 95663
John LaFave 1075 Clark Tunnel Rd Penryn Ca 95663

ALLEN TOLLEFSON 1136 CLARK TUNNEL RD. CA 95663
Lisa Tollefson 1136 Clark Tunnel Rd Ca 95663
Richard Sanderton 6990 COVEY LN Ca 95663
Cody Sanderton 6990 Covey Ln. Ca. 95663
Pat Singleton 1240 CLARK TUNNEL RD Penryn, Ca 95663
Mildred Nippert 1275 Clark Tunnel Rd
A. Clark Nippert " " " Penryn Ca 9566
(Margit) Margit Laurence 1360 Clark Tunnel Penryn 95663
Barbetta Casbeer 1600 Clark Tunnel Rd. Penryn 9566
Jack K. Schumon 1505 Clark Tunnel Rd. Penryn, Ca. 95663
Lorenz J. Schumon 1505 clark Tunnel Rd. Penryn. Ca. 95663
032-121-089 Michael Stone 1425 CLARK TUNNEL RD. PENRYN, CA 95663
Orda G. Poulsen 1281 Clark Tunnel Rd Penryn, Cal 95663
Martha Miyamura 1092 Clark Tunnel Rd, PO BOX 346 Penryn, Ca 95663
Scott Miller 1155 CLARK TUNNEL RD 032-121-006
Bletha D. Miller 1155 Clark tunnel Rd.
Judy E. Miller 1155 Clark tunnel Rd.
John & Tassanai Cooper 1185 Clark Tunnel Rd 032-121-0
Dora R. Morgan 1315 Clark Tunnel Rd Penryn
Orda Poulsen 1301 Clark Tunnel Rd Penryn 032-121-095
Pat Patocka 7052 CALLISON RD PENRYN
Shirley Patocka 7051 Callison Rd - Penryn

Irene Ortiz 1710 - Clark Tunnel Rd Penryn Ca.
Jonnie Mingling 1735 Clark Tunnel Rd Penryn, Calif.
Kathi Ortiz 1740 Clark Tunnel Rd. Penryn Ca
Scott Settelmeyer 1125 Clark Tunnel Road Penryn, CA.
Michael R Beeler 1430 Clark Tunnel Rd Penryn CA
Debra Hinsley 1430 Clark Tunnel Rd Penryn CA.

This page intentionally left blank.

RESPONSE TO COMMENT LETTER I97

Response I97-1: See Response I95-1.

This page intentionally left blank.

Author: "Laurie L. Richards" <richards@calweb.com> at internet
Date: 11/01/1999 1:20 PM
Priority: Normal
TO: Planning at PLACER02
TO: richards.laurie@email.mcclellan.af.mil at Internet
Subject: Bickford Ranch DEIR Comments

COMMENT LETTER I98

---------- Message Contents ----------

Dear Gina,

Attached is an electronic copy of our DEIR comments. A paper copy is also being submitted along with a new Clark Tunnel Road petition and a multi-use trail proposal which included information that could not be sent electronically (i.e., signatures, maps). Please include the CFD hand written questions/requests included only on the paper copy as part of our Bickford Ranch DEIR comments.

We (Wesley Dill and Laurie Richards) would also like to ask for two paper copies of the final EIR.

Thank you,

Laurie Richards

Bickford Ranch Development Standards

Page 1-2 Home occupations require a use permit! We never have. I98-1

Page 1-3 How do they expect to get two family dwellings on the smallest lots? I also have a hard time visualizing #2 at the bottom of the page. I98-2

Development Standards overall: It looks like even though there will be a development notebook depicting each lot, there is so much computation in figuring out whether or not they are meeting each requirement. Something that should be a simple process at the front counter is going to actually be an involved process because they have so many automatic variances and encroachments permitted. Too much to do over the counter and so many lots involved! Should be made simpler for the sake of expediency. I98-3

Page 1-5 On #10, do we really need the ZA to make this call? If so, there should be a notification that it isn't something that will be done at the counter. There may be a delay of several days until he is able to do a field review. I98-4

#11 Are these features going to be counted as coverage. Our ZO would calculate these as part of the footprint maximum allowed. If they are not counted as coverage, some of these lots could have so much covered that it would not be appropriate. It should be made clear. I98-5

Commercial Standards:

Page 2-1 #2.2 I'm not sure why they are requiring a use permit for a bar that is associated with a restaurant. Sounds like overkill but they must have a reason. I98-6

Open Space Standards:

Their list of allowable uses conflict greatly with our ZO. Schools, public buildings, offices, accessory buildings, libraries, firehouses, clubs, recreation centers and restaurants associated with other uses are not permitted. I98-7

Safety Standards:

Lots one acre or more are subject to CDF 30 side and rear unless they get a blanket exception for the development. I98-8

RESPONSE TO COMMENT LETTER I98

Response I98-1: Please note that all of the issues raised by the commentor concern the Applicant's proposed Development Standards, not the DEIR. The Development Standards propose a use permit for home occupations, as the commentor notes. As a Specific Plan, the development standards for the plan area can be more restrictive than the County's Zoning Code, provided such standards are consistent with and implement the Specific Plan and the County's General Plan. The requirement for a use permit for home occupations would only be applicable within the boundaries of the Bickford Ranch Specific Plan. It would not amend or change the current provisions of the County's Zoning Code for areas outside of the Specific Plan area.

Response I98-2: Secondary units would only be permitted on lots that are one-acre and greater in size. See Response I2-4.

Response I98-3: The procedures for review that will occur for the individual building permits will be determined by the County. The extent of detail noted in the Development Standards and what will be contained in the development notebook for each lot (excluding Heritage Ridge) in Bickford Ranch is not substantially different than any plan check process that occurs for a major subdivision in Placer County.

Response I98-4: It is unclear where the commentor finds the reference to the Zoning Administrator in this section. However, if the commentor is referring to the development standards variance process noted in Section 10.7.3 of the Specific Plan, the requirements for this process are specifically subject to County Code application and noticing requirements. The application process includes time for field review if the zoning administrator determines this is necessary. Whether it will ultimately be the zoning administrator who makes this "call" will be the decision of the County.

Response I98-5: It is unclear what the commentor is referring to. There is no #11 in the Residential Land Use standards or in the following section, Commercial Land Use standards.

Response I98-6: The commentor's statement is not correct. A use permit is required for a bar that is *not ancillary* to a restaurant. If a bar were ancillary to a restaurant it would be a permitted use.

Response I98-7: "Open Space" in the context of the proposed project's Development Standards is intended as a generic term incorporating natural open space, as well as landscape corridors, parks and other recreation areas (golf course). There are a limited number of permitted uses allowed in the natural open space in the proposed project. For example, restaurants are not permitted in the natural open space but are permitted in the golf course land use area with a use permit. Firehouses and libraries are only permitted in the park land use area without a minor use permit and not in the natural open space.

The list of allowable uses does not conflict greatly with the County's Zoning Ordinance. Please refer to Sections 3.2 and 3.3 (page 3-2) to compare those uses that are permitted in the natural open space to those permitted in open space under the Zoning Code. The Zoning Code permits low intensity agricultural and public recreational uses "with structural development being restricted to accessory structures necessary to support the primary allowable uses, and critical public facilities" (Zoning Code Section 5.150A). As noted in Zoning Code Section 5.150(B), pipelines, transmission lines, and accessory storage are all permitted. This is consistent with those permitted uses noted in Section 3.2, page 3-2.

Response I98-8: The commentor is correct. The side and rear yard setback requirements in Table 1.3 of the Development Standards for those lots one acre and greater in size (Rural Estate, Rural Residential, and Estate Residential) are consistent with the CDF requirements for 30-foot setbacks. The note to Table 1.3 identifies that the Applicant is seeking an exception to this requirement, but until it is granted, the setbacks for these lots would not be reduced. CDF has indicated that they intend to approve the proposed reduced side setback of the building envelope to 25 feet with a required 30-foot fuel reduction corridor easement with adjoining parcels

and deed restriction, for lots greater than one acre and less than two acres in size, if necessary. This combination of reduced setback and easement with adjoining parcels would have the same effect from a fire access perspective as the 30-foot setback. (Lots less than one acre do not require a 30-foot side setback; lots greater than 2 acres would be large enough to accommodate the required setback without a variance.) This reduction is granted since lot line adjustments have not been finalized by the Planning Department (Guyan, 2000).

COMMENT LETTER I99

Author: <TIMMCCRORY@aol.com > at internet
Date: 11/01/1999 12:08 PM
Priority: Normal
TO: Planning at PLACER02
Subject: (no subject)

------ ------ ------ ------ ---- Message Contents ------ ------ ----- ----- -----

ATTEN GINA LANGFORD AND PLACER CO. PLANNING COMMISSION:

FOR THE RECORD WE WOULD LIKE YOU TO NOTE THAT WE ARE COMPLETELY AGAINST THE BICKFORD RANCH PROJECT IN PLACER CO.

WHEN WE PURCHASED OUR HOME, IT WAS OUR UNDERSTANDING THAT PENRYN WAS A RURAL COMMUNITY WITH A 2.5 ACRE LOT MINIMUM. WE FEEL A DEVELOPMENT OF THIS SIZE AND CURRENT PLAN WOULD IRREVOCABLY CHANGE AND DAMAGE THE RURAL ENVIRONMENT AND NATURAL ECOSYSTEM THAT EXISTS IN THE PROPOSED SITE AREA. **I99-1**

WE ARE ABSOLUTELY AGAINST ANY DEVELOPEMENT ON THE RIDGE, AS THIS IS ONE OF THE LAST REMAINING UNDEVELOPED RIDGES IN SOUTH WESTERN PLACER CO.

THANK YOU FOR YOUR ATTENTION TO OUR CONCERNS.....PLEASE FEEL FREE TO CALL US PERSONALLY TO DISCUSS 916-663-4520.

SINCERELY,
TIM & CARISSA MCCRORY
1110 PLUMTREE LANE
PENRYN, CA. 95663

This page intentionally left blank.

RESPONSE TO COMMENT LETTER I99

Response I99-1: The Bickford Ranch site was identified as a growth area in south Placer County in the 1994 Placer County General Plan. See Master Responses GP-1, GP-3, and GP-4.

This page intentionally left blank.

COMMENT LETTER I100

12/9/99

Placer County Planning Com.
175 Fulweiler Ave
Auburn, CA 95603

PLACER COUNTY
DATE
RECEIVED
DEC 14 1999
PLANNING DEPARTMENT

Dear Members:

I urge you to deny re-zoning of the proposed Bickford Ranch Development. I100-1

There are a number of unmitigatable negative impacts that will occur if the development occurs. One main impact is, of course, traffic. Placer County does not meet air quality standards at the present time – don't add to this. I100-2

The rocky, steep volcanic soils of the property will only cause ecological devastation when developed. I100-3

Let the development take place in the incorporated cities of Roseville, Rocklin, Auburn & Lincoln. I100-4

Presently, the County's rate of growth is way too fast (in my opinion). We are only taking on problems that we tax payers must pay for in the long run. I do not believe this burden should be placed on me. I100-5

If you approve a re-zone – you are only encouraging additional higher density further & further into [illegible] I100-6

There are very few large tracts of land left in Placer County. Let this one stay.

Thank you.

Sincerely,

Mary Ann Hollenbeck
323 Riverview Dr
Auburn CA 95603

RESPONSE TO COMMENT LETTER I100

Response I100-1: See Response I30-1.

Response I100-2: See Response I29-4.

Response I100-3: Development will not be permitted on slopes greater than 30 percent. Mitigation Measures G-A and G-B require the Applicant to comply with Placer County ordinances for all grading activities and prepare and implement a grading and erosion control plan. See also Response I33-39.

Response I100-4: See Master Responses GP-1 and GP-4.

Response I100-5: See Master Responses GP-1 and GP-4.

Response I100-6: See Master Responses GP-1 and GP-4 and Response I30-1.

This page intentionally left blank.

COMMENT LETTER I101

February 27, 2000

Gina Langford
Senior Planner, Bickford Ranch Project
11414 "B"Ave
Auburn, CA 95603

Re: Bickford Ranch Project, PCWA water supply

Dear Gina,

Enclosed is a collection of correspondence relating to PCWA water supplies to PCWA Zone 1, which includes Bickford Ranch. Also included are some of my thoughts on traffic issues surrounding the proposed Bickford Ranch Project, which I originally forwarded to Bill Moore in Public Works for comment. Bill believed the traffic issues were dealt with in the 1994 General Plan FEIR, but research by me indicated otherwise. I will contact Bill again, hopefully, but life is busy. Please ensure everything enclosed is included in the administrative record, and I hope the final EIR will specifically address the traffic issues in a constructive and complete manner. I101-1 I101-2

Participating in the process has been rewarding and I appreciated your time to discuss issues and receive citizen's comments. It is obvious the process is fluid and dynamic with many viewpoints/legal issues to consider. I hope bringing these and other issues to your attention serve as a starting point for discussion/resolution rather than taking of sides. It is your county as well as mine, and I believe quality of life issues are important to you as well. I have come to appreciate the complexity of giving everyone fair consideration, and again thank you for your time from a busy schedule.

Sincerely,

Wesley A. Dill

Wesley A. Dill

Cc: Fred Yeager

PLACER COUNTY
DATE
RECEIVED

MAR 02 2000

PLANNING DEPARTMENT

February 26, 1999

Gina Langford
Senior Planner, Bickford Ranch Project
11414 "B" Ave
Auburn, CA 95603

Dear Gina,

While continuing to review the DEIR I took some extra time to look at the traffic section, Vol I, chapter 7, and noticed some disturbing assumptions, conclusions, and omissions concerning the traffic level of service (LOS) projections.

First, from page 7-12 Vol I of DEIR, the analysis of the "no project" conditions under the 2010 General Plan scenario and under Buildout of Project Vicinity scenario (i.e., with buildout of the Twelve Bridges and Clover Valley Lakes) assumed that the 2010 improvements contained in the Placer County General Plan EIR would be fully implemented. These improvements, shown in Figure 7-3, include the following:

- Sierra College Boulevard would be widened to four lanes from SR 193 to Granite Drive, and to six lanes from Granite Drive to I-80.
- Sierra College Boulevard/I-80 interchange would be reconstructed.
- SR 193 would be widened to four lanes from Sierra College Boulevard to Ferrari Ranch Road.
- SR 65 would be widened to four lanes from Blue Oaks Boulevard to Industrial Boulevard (in the City of Lincoln). I101-3
- Pacific Street would be widened to four lanes from Sierra college Boulevard to Rocklin Road.
-

It was also assumed in the DEIR that Taylor Road would be widened to four lanes near its intersection with Sierra College Boulevard. These scenarios also assume that the internal roadway systems in the Twelve Bridges Specific Plan and Clover Valley Lakes project would be implemented.

Additionally, it was assumed Traffic signals would be installed at the following locations:

- SR 193/Sierra College Boulevard
- Twelve Bridge Drive/Sierra College Boulevard
- English Colony Way/Sierra College Boulevard

- Clover Valley Road/Sierra College Boulevard
- King Road/Sierra College Boulevard
- English Colony/Taylor Road

These assumptions are not supported by any factual discussion of the mechanism for funding these improvements or when they are scheduled to be completed. It is my understanding the roadway improvements to Sierra College Blvd (located in Placer County) were to be partially funded by the build-out of the Bickford Ranch Specific Plan area, plus additional shared development fees from the adjacent cities of Rocklin and Lincoln, contingent upon a future contractual agreement between Placer County and the involved cities. Without this agreement, the adjacent cities are under no obligation to expend development fees collected inside city limits on Placer County roadway improvements. My own assumption is there currently exist no budget or schedule to execute these assumed roadway improvements. Is this a correct assumption? **I101-3 (cont'd)**

With the explosive growth occurring in the adjacent cities and multiple articles in daily newspapers describing the millions of dollars being spent for infrastructure improvements inside the city limits, it seems to this citizen a shared development fee agreement to help improve Sierra College Blvd may be difficult to reach.

Some of the improvements will require Cal Trans and federal/state funding on I-80, and some of the improvements will be the responsibility of the town of Loomis.

Again, these unsubstantiated assumptions are the foundation for the traffic LOS projections in the Bickford Ranch DEIR. Assumptions of this magnitude do not allow for acceptance of the LOS projections in the DEIR.

Second, the DEIR gives LOS data based on the above assumptions:

- Table 7-8, pg 7-14, LOS with existing plus proposed project conditions
- Table 7-11, pg 7-19, LOS 2010 General Plan plus proposed project conditions
- Table 7-13, pg 7-25, LOS with vicinity projects build-out with proposed project

The LOS table that demands to be discussed is missing. There is no discussion or table to illustrate to the public or decision making officials the level of service that will prevail if the assumed roadway improvements listed above are not completed. I feel this is a very real possibility, and one which, the FEIR should address in clear and concise fashion. It is also possible the buildout will be completed prior to 2010 if the economy remains healthy, making the timely completion of these roadways all the more imperative. **I101-4**

A close inspection of Tables 7-8 and 7-13 Average Daily Trip (ADT) data illustrates quite clearly these roadways could be hopelessly gridlocked without the completion of the assumed roadway improvements.

Below is a compilation of these two tables showing the effects on LOS if the improvements are not completed.

Roadway	Segment	No.of lanes	Current ADT	LOS Now	With project ADT	2010 with project/vicinity buildout ADT	LOS 2010
Sierra College Blvd.	SR 193 to Twelve Bridges	2	4,880	A	7,880	17,850	?
	Twelve Bridges to Bickford Ranch Rd	2	5,600	A	8,060	31,600	?
	Bickford Ranch Rd to English Colony	2	5,600	A	15,100	34,860	?
	English Colony Rd to King Rd	2	5,780	A	14,410	29,780	?
	King Rd to Taylor Rd	2	6,100	A	14,100	29,060	?
	Taylor Rd to Granite Dr	2	10,200	A	16,700	39,690	?
	Granite Dr. to I-80	2	14,770	D	21,140	38,710	?
SR 193	SR 65 to Lincoln City Limits	2	6,700	A	7,700	13,660	?
	Lincoln City Limits to Sierra College	2	6,500	A	8,630	24,620	?
	Sierra College to Clark Tunnel Rd	2	5,000	A	5,880	15,100	?
	Clark Tunnel to Newcastle	2	4,400	A	5,280	10,430	?
I-80	West of Sierra College Blvd	6	87,000	D	92,000	114,670	?
	East of SR 193	6	80,000	D	81,250	101,330	?
Lower Ranch Rd	East of Sierra College Blvd	2	-		1,200	1,270	?
Bickford Ranch Rd	East of Sierra College Blvd	2	-		11,300	11,230	?
Clark Tunnel Rd	SR 193 to Callison Rd	2	50	A	10	10	?
	Callison Rd to English Colony Way	2	240	A	200	420	?
English Colony Way	Sierra College Blvd to Clark Tunnel Rd	2	870	A	1,750	5,930	?
	Clark Tunnel Rd to Taylor Rd	2	2,530	A	3,400	6,980	?

Third, the traffic analysis, in assuming roadway improvements will be in place, ignores the potential impact to English Colony from Sierra College Blvd to Taylor Rd. If gridlock occurs towards I-80 on Sierra College Blvd due to non-completion of the assumed roadway improvements, it is likely English Colony will be used as a connector to I-80. I101-5

I believe that any FEIR, to be in compliance with CEQA, should explore the traffic mitigation issue in a more informative manner, substantiated by facts rather than assumptions.

Sincerely,

Wesley A. Dill

Wesley A. Dill

February 27, 2000

John Marin
175 Fulweiler
Auburn, CA 95603

Dear John,

Enclosed you will find correspondence with PCWA regarding the water demands and supply to PCWA Zone 1 of Placer County. You commented in our meeting with Bill Santucci last month Placer County Council advised all legal obligations for the approval of projects would be satisfied, in respects to water issues, if PCWA supplied Placer County with a "will serve letter" for a particular project. It would appear this statement is inaccurate in light of PCWA's responses to my inquiries. Specifically, Mr. Einar Maisch states:

"The Agency does not issue "will serve letters", instead it issues water availability letter. These letters do not commit the Agency to provide service, but instead advise the developer and the land use authority of the current status of water supply availability. A commitment for water supply from the Agency can only result from the payment of the Agency's PERC (Plant Expansion and Replacement Charge)."

It is clear Placer County has an obligation to ensure adequate water supplies prior to project approvals to be in compliance with the 1994 General Plan. It is clear from current responses from PCWA the availability of water for future projects for Zone 1 is unknown. This may change in short course with further research, but could indicate a likely shortage of water with additional project approvals.

It is the position of concerned citizens no further large scale projects should be approved until the water supply issue is resolved, and resolution requires an accurate quantitative analysis of the currently approved projects and effects on the PCWA Zone 1 reserve capacity with current infrastructure. The enclosed correspondence should alert you to the possibility there may be reasonable concerns for water supply issues in PCWA Zone 1, which includes western Placer County. Having been alerted to these issues, it would seem to be a responsibility of Placer County to investigate aggressively these potential problems to ensure responsible land use decisions are made.

Sincerely,

Wesley A. Dill

Wesley A. Dill

Cc Fred Yeager
Gina Langford

February 26, 2000

Einar L. Maisch
Director of Planning & Marketing
Placer County Water Agency
144 Ferguson Rd
Auburn, CA 95604

Dear Mr. Maisch,

Your response to my letter to David Breninger dated January 18, 2000 was appreciated. However, the actual informational content of the letter was disappointing in regards to the specific questions I posed. I made the assumption PCWA worked closely with Placer County Planning Department and would be aware of the number of approved homes in western Placer County (zone 1). It is clear at this time from your answers PCWA seems to have no clear picture regarding the upcoming water needs of a rapidly developing western Placer County, and any solution to the water needs involving the permanent pump stations on the American River are potentially 4+ years away. I find it incredulous you seem to be able to provide barely rudimentary responses, and in many cases no response, to questions PCWA must have answers to serve their customers. I can appreciate your loyalty is to PCWA as a business, but PCWA has special responsibilities to the citizens of Placer County. Below are my comments regarding a sampling of your responses:

Question 1. My question asked for total reliable water delivery capacity with current infrastructure to PCWA Zone 1 in acre-feet/year. Your response focused on treatment capacity at the Foothill and Sunset water treatment plants. Treatment and delivery are not synonymous, as you are aware. Water must be supplied to the treatment plant before it can be treated. Please answer question 1 with a complete and accurate answer.

Question 2. Your response was lengthy and discussed water rights in detail, all of which is appreciated, in a general informational sense. Can you please verify that Zone 1 has a total reliable water delivery capacity with current infrastructure of 113,000 AF with 100,400 acre feet supplied from PG&E Drum-Spaulding hydro system and 13,000 acre feet supplied by the temporary pumps on the American River at Auburn.

Question 4. You stated 7500 AF is the current reserve capacity to Zone 1 with the current infrastructure, with the acknowledgement the temporary pumps on the American River at Auburn are the limiting factor. You stated 2,200 AF is needed for development projects that are under construction and have paid their connection fees, and approximately 1,100 AF of demand is currently in plan check at PCWA, and implied PCWA uses the estimate of .6AF per home in calculating water demands. Please give specific project names, the number of dwelling units/homes used to calculate these figures, and do these water demand figures include all landscaping water needs for these development areas?

Question 5,6,7. You failed to respond to any of these, and your reference to question 4 is inadequate. Your omission of a large number of homes currently approved in zone 1 which are not currently in PCWA plan check or under construction grossly underestimates the cumulative depletion on water reserve capacity for zone 1. This depletion of water reserve capacity is critical considering the substantial unresolved issues surrounding the funding/construction of the future permanent American River pump station. In view or your answer to question #4 regarding reserve capacity to PCWA Zone 1, please answer the following questions:

- What are the currently approved projects in Zone 1, both commercial and residential, that have neither paid their connection fees nor are in the plan check stage at PCWA, for which PCWA will provide water?
- What is the number (actual or estimated) of dwelling units/households in these projects as currently approved by Placer County?
- What is the estimated annual water demand in AF for the residential projects? Please discuss calculations.
- What is the estimated water demand in AF for the commercial projects under this same status? Please discuss calculations.

Question 8. Allow me to more narrowly define my original question. What is the estimated landscape, raw water request, in AF for each approved project (please state project name) in PCWA Zone 1 that have neither paid their connection fees nor are in the plan check stage at PCWA? What is the total AF of raw water requested by the project proponents for landscaping needs for these projects?

Question 9. I am astounded that PCWA seems to be in the dark as to the upcoming water demands for projects already approved in PCWA Zone 1. It would seem this information would be a top priority for PCWA. I cannot imagine any business not placing a great deal of emphasis on estimating the future needs of its core business. Perhaps you have concluded your research and can now provide the total demands of all approved projects in PCWA Zone 1 which were not included in the 1999 water delivery totals, and the combined effect on PCWA's reserve capacity (with current infrastructure) in Zone 1. If so, please provide this information. If PCWA does not currently know these answers, please clearly state that, also.

Questions 18-31. Your answers seem to indicate PCWA has no clue when the permanent pump station on the American River will be completed given your sketchy responses to these questions. It would appear the estimate given by PCWA consultant Jack Warren it would require 4-6 years to acquire funding and complete construction of the permanent pump stations are probably reasonable, assuming no unknown problems.

Question 35. It would appear from your responses to my questions PCWA is currently unable to supply Placer County Planning Department, Planning Commission, or Board of Supervisors with any reasonable "water availability" estimate of reserve water supply to PCWA zone 1. Water availability is required by the Placer County General Plan prior to approval of any development, and your responses indicate reserve water availability in PCWA zone 1 is unknown.

I'm sure you still have my original questions on file. I have attempted to clarify any ambiguity of those original questions to facilitate an accurate and timely response from PCWA, and would appreciate a prompt response to these clarifications. I would hope both yourself and PCWA will recognize and acknowledge your collective responsibilities which go beyond expanding the business base of PCWA and include providing accurate and timely information to simple questions asked by involved citizens of Placer County. You may contact me at (916) 663-0244, or my mailing address is 7095 Allen Ln, Penryn CA, 95663.

Sincerely,

Wesley A. Dill

Wesley A. Dill

Cc: Dave Breninger
Pauline Roccucci
Fred Yeager
Gina Langford
John Marin
Placer County BOS

Placer County Water Agency

Business Center: 144 Ferguson Rd. • Mail: P.O. Box 6570 • Auburn, California 95604
(530) 823-4850 800-464-0030 TDD (530) 823-4966

A Public Agency

BOARD OF DIRECTORS
Pauline Roccucci • Alex Ferreira
Otis Wollan • Lowell Jarvis
W. Bruce Lee
David A. Breninger, General Manager
Ed Tiedemann, General Counsel

February 14, 2000
File No.

Wesley A. Dill
7095 Allen Lane
Penryn, CA 95663

Fax No. (916) 663-0245

RE: Response to your letter dated January 18, 2000

Dear Mr. Dill:

Your letter asked a number of specific questions. This letter is intended to provide you with narrative answers to those questions to which I know the answers. Additional information will require research on the part of Agency personnel. In response to similar questions posed by Michael Rogers of WECARE, the Agency is assembling records for review on February 15, 2000, here at our business office at 4:00 p.m.

1. **What is PCWA's total reliable, water delivery capacity with current infrastructure to PCWA Zone I in acre-feet/year?**

   This question is assumed to be in reference to treated water delivery capacity. Current lower Zone 1 treatment capacity at the combined Foothill and Sunset Water Treatment Plants (WTP) is 32 million gallons per day (mgd). In December 1999 the Agency awarded a construction contract for a 28 mgd expansion of the Foothill WTP.

2. **What are the sources of this water, and what is the amount supplied by each source?**

   The Agency purchases 100,400 acre feet (AF) per year from PG&E from their Drum – Spaulding hydro system. In addition, the Agency has 120,000 AF of Middle Fork Project (MFP) water rights in the American River, deliverable at Auburn or Folsom Reservoir, and 35,000 AF of contract entitlements from the Central Valley Project (CVP) deliverable at Folsom Reservoir.

Currently, the Agency has access to all of its PG&E contract supply and 13,000 AF of its MFP supply through temporary pumps on the American River at Auburn.

Out of the Agency's 155,000 AF American River supply, 55,000 AF is under contract to San Juan WD to serve Granite Bay, and to the City of Roseville. The remaining American River supply, 100,000 AF, plus the 100,400 PG&E supply, is intended for the buildout of the Agency's retail service area.

3. **What was the total amount of water, in acre-feet, delivered to Zone 1 in 1999?**

104,400 AF

4. **What is the current reliable reserve capacity with current infrastructure to Zone 1 (please consider reserve capacity the difference between 1999 delivered water usage to Zone 1 and the total reliable water delivery capacity figure from question #1 above)?**

By Resolution in May 1998, the Board reserved about 9,000 AF to supply up to 8 mgd of the 28 mgd Foothill expansion and 2.5 mgd for increased treated water demands in the Auburn Bowman treated water system, until completion of the permanent American River Pump Station (ARPS). Assuming the completion of the Foothill expansion, the limitation on new treated water delivery is the temporary limitation of the temporary pumps at Auburn. Currently, the amount of remaining reserved water (not included in 1999 deliveries) is about 7,500 AF. Of that, about 2,200 AF is needed for development projects that are under construction and have paid their connection charges to the Agency. Another approximate 1,100 AF of demand is currently in plan check at the Agency. An average residential home uses about .6 AF per year.

5. **Are there any approved projects in Zone 1 which PCWA has a commitment with, or anticipated commitment with, to supply water which were not included in the 1999 water usage figure from question #3 above?**

See #4

6. **What are the current approved projects?**

Requires further research.

7. **How many dwellings requiring water will PCWA serve in these projects as currently approved?**

Requires further research.

8. **Will PCWA supply water for common landscaping needs / golf courses for any of these projects?**

The Agency currently has contracts to supply untreated irrigation water for common areas and golf courses within the Del Webb, Twelve Bridges, Bickford Ranch and Whitney Oaks development projects. Some, but not all of that water was delivered in 1999. The reservation of water for treated delivery to new developments referred to in #4 assumed full contract irrigation deliveries to those projects

9. **What is your best estimate for the total amount of water, given in acre-feet per year, that each of these projects is anticipated to use? What is their total combined anticipated water needs? What is your reasonable margin of error associated with these estimates?**

May be answered in part by #4. Required further research.

10. **What is your best estimate for when each of these projects will begin using water, using reasonable assumptions based on anticipated project construction progression?**

Unknown

11. **Do you anticipate at this time, using reasonable assumptions, the projects in questions #6 to be utilizing water prior to the proposed Bickford Ranch project?**

The Agency's treated water demands will increase as new projects pay their connection charges and construct their projects.

12. **Do you have a "first come, first serve" policy when delivering water to new customers?**

Yes, the Agency operates on a first come, first served basis. To answer the question that was not asked, It is not possible to predict whether or not the Bickford Ranch project will request service treated water service while there remains unused capacity in the temporary American River pumps.

13. **What is PCWA's estimate for total water demand (acre-feet/year) at buildout for the Bickford Ranch Project, assuming 1950 dwellings and golf course / common grounds, as currently proposed by the developer?**

Requires further research.

14. **What is PCWA's estimate for water needs of the Bickford Ranch project at completion of Phase I of project as currently projected?**

Requires further research.

15. **Does PCWA have cooperation from necessary landowners for construction / supply easements to deliver water to the Bickford Ranch project?**

Requires further research.

16. **Will PCWA exercise eminent domain to obtain and necessary easements for the Bickford Ranch project?**

Undetermined.

The following questions are based upon assertions in the Draft Environmental Impact Report for the Bickford Ranch project.

17. **What is the reliable quantity of water (acre-feet per year) that can be pumped from the American River with the current PCWA infrastructure?**

13,000 AF.

18. **What is the estimates cost of the permanent pumps station (in today's dollars)?**

$17,000.000.

19. **To date, how much money has been put in the reserve for the permanent pump station?**

$11,900,000 has been appropriated by Congress for the ARPS project.

20. What is (are) the funding source(s) for the permanent pump station?

Federal appropriation is the intended funding source.

21. How much money is appropriated annually for the permanent pump station?

The 11.9 million was appropriated over the past 3 fiscal years.

22. How long has PCWA been accumulating construction funds for the permanent pump station project?

3 years.

23. Where are the funds previously appropriated maintained?

These are federal funds. We do not know where they are.

24. Are these funds readily accessible when needed?

Unknown.

25. What is required to access the funds when needed?

Unknown – the ARPS is a federal project. It will be constructed in satisfactory compliance with a contract between Reclamation and the Agency.

26. When does PCWA estimate adequate construction funds will be available to complete the project?

Unknown.

27. Will PCWA start construction of the permanent pump station without fill construction funding in place?

Unknown.

28. When will the Draft Environmental Impact Report and Draft Environmental Impact Statement be available for review by the public?

I assume the EIR/EIS referred to is for the ARPS. The current schedule for release of the draft is about June of 2000.

29. Who is (are) the contact personnel and what are their phone numbers at the lead agencies to allow citizens to be on the distribution list for the respective environmental reports?

It would be best to contact Tami Mihm with Surface Water Resources, Inc at (916) 325-4047 to have your name put on the distribution list.

30. Once the environmental document review is completed by public / lead agencies and the documents are certified as final, what specific actions must be taken by each lead agency to prepare for actual construction of the permanent pump stations (please briefly describe the steps each agency must take and a reasonable estimate for completion of these steps)?

Reclamation must let a construction contract for the ARPS, and Reclamation and the Agency will execute an agreement regarding the operation and maintenance of the facility. These actions should take place immediately upon certification of the final EIR and the equivalent NEPA process and the release of federal funds.

31. Using reasonable estimates by qualified individuals, how long will be required to construct the permanent pump station and have it operational?

Construction is anticipated to take about 2 years.

32. How much water will the permanent pump stations be able to readily deliver?

35,500 AF.

33. Will other delivery infrastructure require improvements to accommodate the increased pumping capacity?

Not immediately, Increased deliveries to the Foothill WTP will occur through exchanges with the Agency system.

34. **If so, please detail the improvements, any regulatory requirements, cost, funding, and estimated construction times to completion?**

See #33.

<u>The following questions are general in nature but are directly related to the consideration of the Bickford Ranch project.</u>

35. **What are PCWA's guidelines / requirements which govern the issuance of "will serve letters" or their equivalent to new customers / county agencies?**

The Agency does not issue "will serve letters", instead it issues water availability letter. These letters do not commit the Agency to provide service, but instead advise the developer and the land use authority of the current status of water supply availability. A commitment for water supply from the Agency can only result from the payment of the Agency's PERC (Plant Expansion and Replacement Charge).

36. **Does PCWA have a current general or master plan to manage water delivery to its current and future customers? If so, please make a copy available so the public may review it.**

No. Continuous planning efforts occur within the Agency's engineering department, but no Master Plan has been adopted by the Board

37. **Did PCWA include the Bickford Ranch project in its current general / master plan?**

Within the Agency's internal planning, it has been assumed that the Bickford Ranch project will request treated water service in addition to the untreated irrigation service it has already contracted for

38. **Does PCWA have a water-rationing plan in for drought conditions should they occur? If so, please make a copy available, or outline the plan in brief.**

Yes, it is included in the Agency Urban Water Management Plan. [**copy requested**]

39. **Does PCWA have a water rationing plan should water shortages occur during peak water use periods in the future in the absence of a drought? If so, please make a copy available, or outline the plan in brief.**

No.

40. If PCWA has no water rationing plans in the event shortages occur for any reason, is PCWA currently developing a plan? If not, does PCWA intend to develop a plan in the near future?

The Agency does not anticipate the need for a "rationing plan" unrelated to drought.

41. Does PCWA anticipate achieving exchange in water rights between the American and Sacramento Rivers in the near future (next 5 years)? If so, please detail all regulatory, legal, construction and funding issues.

The Agency is currently pursuing the option of exchanging American River water rights and contracts for a supply from the Sacramento River. Hoped for timing for completion is 10 years. The broad steps are:

Renewal of the Agency's CVP contract with a provision that provides the opportunity for the exchange. This will require an EIS.

Another EIS (or it may be combined into a single document together with the CVP renewal EIS) will be required to assess the potential environmental impacts of the construction and use of the facility.

42. Does PCWA anticipate and potential problems with water supplies from Lake Spaulding as a result of the PG&E divestiture of the Drum / Spaulding System? If so, please outline. If not, please give rational.

No. PG&E's contractual water supply obligations to the Agency will pass to any subsequent owner.

If I may be of further assistance, please contact me.

Sincerely,

PLACER COUNTY WATER AGENCY

Einar R. Maisch / jmg

Einar L. Maisch
Director of Planning & Marketing

ELM/jmg

cc: Bob Joehnck
Michael T. Roger (WPCARE)
Gina Langford (Placer County Planning Department)
Ed Tiedemann

This page intentionally left blank.

RESPONSE TO COMMENT LETTER I101

Response I101-1: Comment noted. This information, as well as PCWA's reply, is included in this FEIR and the administrative record, as requested by the commentor.

Response I101-2: A traffic analysis is provided in Chapter 7 of the DEIR. Supplemental traffic information is provided in Master Responses T-1, T-2, T-3, T-4, T-5, T-6, and T-7.

Response I101-3: See Master Response T-1 regarding traffic mitigation fees and improvements to Sierra College Boulevard and other roadways. See also Response A8-8.

Response I101-4: See Master Response T-2 regarding the reasons for analyzing traffic conditions with roadway improvements.

Response I101-5: See Master Response T-2 regarding the need for roadway improvements. Vehicles experiencing gridlock on I-80 could use a number of alternative routes, including those mentioned by the commentor.

Placer County Water Agency

Business Center: 144 Ferguson Rd. • Mail: P.O. Box 6570 • Auburn, California 95604
(530) 823-4850 800-464-0030 TDD (530) 823-4966

A Public Agency

BOARD OF DIRECTORS
Pauline Roccucci • Alex Ferreira
Otis Wollan • Lowell Jarvis
W. Bruce Lee
David A. Breninger, General Manager
Ed Tiedemann, General Counsel

March 21, 2000
File No. 114-22 & 114-24

PLACER COUNTY
DATE
RECEIVED
MAR 22
PLANNING DEPARTMENT

Mr. Wesley Dill
7095 Allen Lane
Penryn, CA 95663

Dear Mr. Dill:

It is unfortunate that you found my last letter unclear. I think perhaps it would be much more effective for the two of us to sit down and have a conversation regarding the water supply issues for the proposed Bickford Ranch project rather than attempt to reduce everything into writing. Water Supply issues in western Placer County are complex and to understand the subtleties requires discourse, or a very long letter indeed, which I do not have time to prepare.

I have received a copy of a 5 page document, reportedly prepared by you, entitled *Conditions of Approval for the Bickford Ranch Specific Plan Draft Version II 01/03/2000* which asserts certain facts regarding water supply which are not correct. I feel it would be beneficial for us to meet as soon as possible so that in the future your arguments in regards to this project can be based upon more accurate information.

Please call me at (530) 823-4889 to arrange a time to meet.

Sincerely,

PLACER COUNTY WATER AGENCY

Einar L. Maisch
Director of Planning and Marketing

ELM/jmg

cc: Fred Yeager
John Marin
David Breninger