# SUPPLEMENT TO SECTION 4.3, HYDROLOGY, WATER RESOURCES, AND WATER QUALITY

### 4.3.5 INTRODUCTION

On February 1, 2007, the California Supreme Court issued its decision in the matter of *Vineyard Area Citizens For Responsible Growth v. City of Rancho Cordova* (42 Cal.4th 412), reversing the lower court's ruling in favor of the respondents. The decision enunciates four overarching principles with regard to the manner in which cities and counties should prepare water supply analyses when preparing environmental impact reports (EIRs) for large land use plans pursuant to the California Environmental Quality Act (CEQA). These principles are as follows:

- 1. An EIR may not simply assume that a water supply will be available. Decision makers must be presented with sufficient facts to evaluate the pros and cons of supplying the amount of water that will be needed for full build-out.
- 2. The water supply analysis cannot be limited to the first few years or first phases of development. To the extent reasonably possible, the EIR must include an assessment of the potential effects of producing the long-term water supply.
- 3. Although CEQA, consistent with Senate Bill 610 (Water Code, § 10910 et seq.), does not preclude the approval of major land use projects or plans absent a guaranteed water supply, the EIRs for such projects should nevertheless address how certain or "likely" such supplies are. The EIR must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability.
- 4. Where there is some uncertainty regarding actual availability of the water supply, there must be some discussion of possible replacement sources or alternatives to use of the anticipated water, and the environmental consequences of those contingencies.

Related to "principle four" above, the Court held that where an EIR makes a sincere and reasoned attempt to analyze the water sources the project is likely to use, but acknowledges the remaining uncertainty, a measure for curtailing development may play a role in impact analysis. However, an alternative or mitigation measure to curtail development may not be substituted for the required analysis. Further the environmental effects of curtailing development, which may result in a partially built-out project, must also be analyzed. Commenters on this document should limit their comments to those aspects of the previous analysis mentioned or otherwise addressed herein (CEQA Guidelines, § 15088.5, subd. (f)(2)).

In response to the Court's decision, Placer County has undertaken a detailed review of the Placer Vineyards Specific Plan Final EIR in order to ensure full compliance with the Court's ruling. This supplement to the previous analysis has been prepared in order to describe how the Final EIR complies with the Court's ruling and to update and elaborate on the existing water supply analysis, as necessary and appropriate.

### 4.3.6 WATER SUPPLY OVERVIEW

Because the manner in which potable water would be provided to projects in western Placer County continues to evolve, the approach to supplying surface water to the Placer Vineyards Specific Plan includes several options and proposals. Due to the length of time that the project has been under consideration, the mix of options and proposals and the priority given to each have evolved as time has passed and new information became available. To ensure compliance with the Court's direction, the following discussion is intended to provide a current, consistent and coherent description of the future demand for new water due to growth and the amount of water potentially available. The descriptions are consistent with and elaborate on the information presented in the Placer Vineyards Specific Plan Final EIR.

The potable water demand for the Placer Vineyards Specific Plan has been assumed to be approximately 11,500 AFA at build-out. This is consistent with the demand number (11,496) used in the Updated Placer Vineyards Base Specific Plan Water Supply Assessment (February 2006) prepared for PCWA. The potable water demand did not include demand for public landscape areas that is to be met with use of recycled water. Recycled water demand was assumed to be 1,557 AFA for a total water demand of 13,057 AFA for the project. Such water should be available if, as anticipated, the project's preferred wastewater treatment scenario – use of the Dry Creek Wastewater Treatment Plant (DCWWTP) - comes to fruition. Recycled water use has since been adjusted upward in the Final EIR, due to a desire to adopt a more aggressive approach to use of recycled water. This coupled with a refinement of assumptions (Placer Vineyards Draft Specific Plan Potable Water Supply Plan, Brown and Caldwell, September 2006) has permitted adjustments in the use of potable water leading to an overall water demand that is now slightly less (12,542 AFA) than was earlier predicted (Brown and Caldwell found that potable water demand would be approximately 10,863 AFA). It is clear from the above that the Placer Vineyards Specific Plan Final EIR took a conservative analytical approach, assuming slightly more use of potable water than is now projected. For purposes of maintaining a clear and consistent approach, this supplemental discussion will continue to use the more conservative 11,500 AFA potable water demand assumption. Notably, however, the analysis set forth below would not be affected if the project area sends some or all of its effluent to the Sacramento County Regional Sanitation District's wastewater treatment plant near Freeport, California, instead of the DCWWTP, as the additional increment of potable water demands under such a scenario are not material to the analysis.

# 4.3.7 WATER SUPPLY DESCRIPTION AND SUPPLEMENTAL DISCUSSION

The Final EIR for the Placer Vineyards Specific Plan contains the following water supply proposals for meeting the identified demand. This section describes the proposals, updates the information where necessary, and provides additional background that was not available at the time the Revised Draft EIR was prepared. The County's intent is to fully satisfy CEQA's informational purpose by including all of the available information known to it about water supply, and to show the likelihood of water availability. The table below summarizes the sources of water. Each of these sources is described in more detail below.

Executive Summary Table: Water Supply				
		Source (Status)		
Total Assumed Potable Demand for PVSP	11,500 AFA	PVSP Revised Draft EIR and Second Partially Recirculated Revised Draft EIR (CEQA review ongoing)		
Initial Surface Water Supply	(1) PCWA supply via Roseville infrastructure  Up to 8.15 MGD of a portion of the currently approved 35,500 AFA from PCWA's unused American River Middle Fork Project water, to be diverted at PCWA's new permanent American River Pump Station, conveyed to and treated at the Foothill Water Treatment Plant.	(1) PVSP Revised Draft EIR and Second Partially Recirculated Revised Draft EIR (CEQA review ongoing)		
	(2) PCWA supply via pipeline from Ophir Water Treatment Plant.  The "bottleneck" created by the 10 MGD Roseville-owned pipeline limitation could be eliminated by utilizing alternative infrastructure (see Section 6.3.5). The source for the supply would be the same as under (1) above, to be diverted at the American River Pump Station and treated at the Ophir Water Treatment Plant.	(2) PVSP Revised Draft EIR and Second Partially Recirculated Revised Draft EIR (CEQA review ongoing), Phase II Foothill Water Treatment Plant and Pipeline Project EIR (CEQA review complete)		
Secondary Initial Surface Water Supply	6,000 AFA of the 29,000 AF of PCWA Middle Fork American River water currently contracted to the Sacramento Suburban Water District	PVSP Revised Draft EIR (CEQA review ongoing, though more CEQA review may be required)		
Long-Term or Buildout Surface Water Supply	35,000 AFA from the Sacramento River furnished by PCWA consisting of CVP contract water or an exchange with Reclamation for Middle Fork Project water  (1) Primary alternatives being analyzed in SRWRS EIS/EIR:  (a) Elverta Diversion Alternative (35,000 AFA diverted by PCWA at Elverta along with additional supplies for other purveyors)	(1) Sacramento River Water Reliability Study (SRWRS) Draft EIS/EIR (CEQA review ongoing)		

Executive Summary Table: Water Supply				
		Source (Status)		
	(b) American River Pump Station-Elverta Diversion Alternative (with PCWA taking 35,000 AFA at American River Pump Station in addition to currently authorized diversion of 35,500 AFA and other purveyors going ahead with their own diversion at Elverta)			
	(2) Alternative analyzed in PVSP Revised Draft EIR (a) Elverta Diversion Alternative  (b) American River Diversion at Folsom Dam Alternative	(2) PVSP Revised Draft EIR and Second Partially Recirculated Revised Draft EIR (CEQA review ongoing)		
Backup Groundwater Supply	Redundant water source equal to at least 25% of the required water supply on a maximum daily demand basis	PCWA's Integrated Water Resources Plan (IWRP) and Western Placer County Groundwater Storage Study (review complete)		

#### **INITIAL SURFACE WATER SUPPLY**

An immediate or initial surface water supply is to be provided from PCWA's unused American River Middle Fork Project water to be diverted at PCWA's new permanent American River Pump Station, conveyed to and treated at the Foothill Water Treatment Plant. It would then be delivered through PCWA's existing transmission pipeline system to the vicinity of Industrial Avenue. There the water would be introduced into the City of Roseville's potable water system and conveyed to the intersection of Baseline and Fiddyment roads.

As the Revised Draft EIR explained, the effects of diversions at the American River Pump Station were previously analyzed in the American River Pump Station Project Final EIS/EIR, 2002 (Revised Draft EIR page 4.3-35). Relevant material from the American River Pump Station Final EIR/EIS is summarized in the Revised Draft EIR, per CEQA Guidelines Section 15150 (e.g., see Revised Draft EIR page 4.3-39). There are no relevant mitigation measures appearing in the American River Pump Station Project Final EIS/EIR that would warrant being carried forward in this Specific Plan EIR, as no mitigation measures from that EIR would need to be carried out by Placer County. The Revised Draft EIR provides notice on page 2-18 of all referenced documents, including the American River Pump Station Project Final EIS/EIR. Although the analysis was performed for a Folsom Reservoir diversion (secondary initial surface water supply) as discussed below, this analysis models and discloses the effects of a 6,000 AFA withdrawal from the American River system, in which flows in the Lower American River

below Folsom Dam are of the greatest environmental concern. Finally, as disclosed on Revised Draft EIR page 4.3-72, modeling for the cumulative condition includes PCWA's diversion of up to 35,500 AFA Middle Fork water from the American River Pump Station, which includes the 10 MGD to be transmitted through the Roseville-owned pipeline.

The Roseville pipeline and the wheeling agreement for delivery of water by PCWA through the pipeline are in place (Revised Draft EIR page 4.11-62) and this source of supply could be delivered to the project immediately upon the commencement of construction of development pursuant to the Placer Vineyards Specific Plan by extending a pipeline approximately ½ mile in Baseline Road to the project site. The EIR assumes that, despite likely competition for this finite supply, the supply would be relied on through 2012 and into 2013 during project development and that the connection would be constructed with the initial Backbone Infrastructure, which must be substantially completed prior to the issuance of any building permits (Revised Draft EIR, page 3-34 and Development Agreement, page 34). Construction within the Placer Vineyards Specific Plan area is now projected to begin in 2009, with an anticipated, if not yet completely certain, long-term water supply from the Sacramento River becoming available approximately 2016. Table 4.3.5-1 describes projects within the pipeline's service area that would potentially utilize this supply.

There is a 10 MGD limitation on PCWA water deliveries through the Roseville-owned system. For analytical purposes, an initial surface water supply of 6,000 AFA was assumed. If this supply were to be delivered through the Roseville-owned system, it would translate into a peak day flow rate of 10.7 MGD, which would exceed the pipeline's 10 MGD capacity on a peak day basis. It has also been shown and reported in the Final EIR that existing and future projects (e.g, the proposed Regional University Specific Plan) would compete for a share of the 10 MGD available capacity, which means that Placer Vineyards could potentially receive only a portion of the available water under this scenario.

More current information is now available regarding remaining capacity in the Roseville-owned pipeline and projects that could compete for the remaining supply. It has been determined that approximately 8.15 MGD of the pipeline capacity (enough water to supply over 7,000 dwelling units) is currently unutilized based on July 2006 peak day flow rate (James Ray, Personal Communication, MacKay & Somps, February 2007). As reported in the Revised Draft and Final EIRs, existing projects, such as Morgan Creek, already rely on this supply; therefore a full 10 MGD is not currently available. In order to understand how the remaining 8.15 MGD could be used, Figure 4.3.5-1 has been prepared showing the service area for the remaining water that is the subject of the wheeling agreement. Table 4.3.5-1 provides an assumed buildout for the service area, based on actual approved and pending projects. Please note that the Table shows water commitments rather than actual demand. Actual demand would likely be less and would occur 18 to 24 months after water is committed (i.e., the difference in time between commitment and water delivery).

Some of the projects have received tentative map approval and are the most likely to proceed. Others, including the Placer Vineyards Specific Plan, are currently seeking entitlements from Placer County. Of those seeking entitlements, Placer Vineyards Specific Plan is the only one to have received a recommendation for approval from the Placer County Planning Commission.

As illustrated on Table 4.3.5-1, based on the most current information, and assuming competition from other projects, the Placer Vineyards Specific Plan's initial surface water supply would be reasonably certain and adequate for the first four to five years of projected development. This is less time than the six to eight years assumed in the Revised Draft EIR.

PCWA is currently designing a method to increase water treatment capacity at its Foothill Water Treatment Plant. By increasing the filtration rate from 5 GPM to 6 GPM the initial phase (the first 15 MGD) of the plant is capable of treating an additional 3 MGD. This would increase the Foothill Water Treatment Plant to 58 MGD. This additional treatment rate was tested over a three year period, then reviewed and approved by the State of California Department of Health Services. To deliver the increased capacity, PCWA needs to construct 400-500 linear feet of transmission piping within the existing footprint of the Foothill Water Treatment Plant. The pipeline construction is expected to be complete in 2008.

#### SECONDARY INITIAL SURFACE WATER SUPPLY

A secondary initial surface water supply could be provided consisting of 6,000 AFA of the 29,000 AF of PCWA Middle Fork American River water currently contracted to Sacramento Suburban Water District. See Revised Draft EIR page 4.3-35 and following for a detailed description of this water entitlement. The supply would be diverted from Folsom Lake, treated at Sidney N. Peterson Water Treatment Plant (San Juan Water District) and conveyed via the Cooperative Transmission Pipeline that currently ends near Antelope and Walerga roads. Two alternative water conveyance pipeline corridors (Revised Draft EIR Figure 3-5, Water Supply Option A and Water Supply Option B) extending to the Specific Plan area from the Cooperative Transmission Pipeline are described and analyzed in the Revised Draft EIR. For an example of off-site infrastructure analysis, see Revised Draft EIR page 4.4-114 and below.

This 6,000 AFA American River diversion was modeled and evaluated for effects on water resources, biological resources, cultural resources, and recreational resources resulting from the withdrawal. For an example of this analysis see Revised Draft EIR page 4.3-76 and below. This water supply would be pursued in the event the long-term or buildout supply options described below did not become available before the available water from the Roseville-owned pipeline was exhausted. This Middle Fork water supply would be in addition to the supply from the Roseville-owned pipeline, rather than a replacement supply and is reflected on Table 4.3.5-1.

Although multi-party agreements would be necessary for diversion and treatment of the water at the San Juan Water District's Sidney N. Peterson Water Treatment Plant, this source could provide an additional supply that would extend the available water through approximately 2020 (Table 4.3.5-1). This would provide a water supply well beyond the 2016 target (see next paragraph) for availability of the long-term or buildout water supply. Although, as noted above, the Revised Draft EIR analyzes various effects of this proposal, it is likely that additional, more focused CEQA review would be necessary at the time that the project is undertaken in earnest by the potentially participating public agencies.

#### LONG-TERM OR BUILDOUT SURFACE WATER SUPPLY FROM THE SACRAMENTO RIVER

An 11,500 AFA long-term or buildout water supply from the Sacramento River is to be furnished by PCWA consisting of CVP contract water or Middle Fork Project water rights water, exchanged with the United States Bureau of Reclamation (Reclamation) for releases down the American River from PCWA storage facilities on tributaries of the American River.

This is the proposed permanent or buildout water supply. PCWA is authorized through a contract with Reclamation to take 35,000 AFA of CVP contract water at Folsom Reservoir or other places that are agreed to by the affected parties. PCWA is currently pursuing a 35,000 AFA diversion at the Sacramento River in accordance with the Water Forum Agreement, of which the 11,500 AFA for Placer Vineyards is a portion. PCWA's full proposed 35,000 AFA diversion was modeled and evaluated for the Placer Vineyards Specific Plan project, including effects on water resources, biological resources, cultural resources, and recreational resources resulting from the withdrawal. The description and evaluation of this supply include a pipeline from the Sacramento River to the Placer Vineyards Specific Plan (Revised Draft EIR Figure 3-5) planned for construction by approximately 2016.

A separate EIR/EIS is currently in process for the water diversion project and an initial alternatives analysis has now been completed (*Sacramento River Water Reliability Study Initial Alternatives Report*). There is no analysis in the Placer Vineyards Revised Draft EIR of the future diversion structure, treatment plant or storage facilities. This omission reflects the fact that, at the time the Revised Draft EIR was published, there was a lack of meaningful information to include in the Revised Draft EIR and the fact that the facilities were being separately evaluated in parallel fashion. Page 4.11-63 of the Revised Draft EIR discloses that: "The diversion structure, pumps and water treatment facilities are not described or evaluated in this Revised Draft EIR, but are being evaluated separately by PCWA and Reclamation in a joint EIS/EIR (SCH #2003082076)...The Draft EIR/EIS is currently projected for completion during the winter of 2006/2007." The Draft EIR/EIS is currently still in production and now is projected for public release some time in late 2007.

The County believes that there is a reasonable certainty that the 11,500 AFA long-term or buildout water supply from the Sacramento River will become available to serve the Project. That is not to say, however, that the Sacramento River diversion project does not face regulatory hurdles, as explained below. The County's confidence in the availability of this supply is based on the factors discussed below, all of which favor development of the Sacramento River diversion project.

First, as noted above, PCWA has Middle Fork American River water rights (see Revised Draft EIR page 4.3-35 and following for a detailed description of this water entitlement) and 35,000 AFA of CVP contract water to back up the 11,500 AFA buildout water supply. Thus, the Sacramento River diversion entitlement is not analogous to the uncertain State Water Project (SWP) "entitlements" – a term no longer used -- that the appellate courts have said included substantial amounts of "paper water." (See *Planning and Conservation League v. Department of Water Resources* (2000) 83 Cal. App. 4th 892, see also *Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal. App. 4th 715).

Second, quite notably, the Sacramento River diversion project has the support of both the Water Forum Agreement signatories and, it appears, the U.S. Congress. As explained in Section 4.11.7 of the Revised Draft EIR, the Water Forum Agreement represents a regional consensus that water purveyors, such as PCWA, with unexercised water rights on the American River could reduce the environmental impacts of their future diversions based on those rights if they agreed instead to pursue diversions of like amounts of water from the Sacramento River. Because of local environmentalist support for this approach, the Sacramento River supply is less likely to encounter environmental opposition than would supplies taken from the American River. Thus, on page 14 of the Introduction and Summary of the Water Forum Agreement (January 2000), "expansion of Sacramento River diversion and treatment facilities" is listed as one of the major water supply projects that will receive Water Forum support upon signing the Water Forum Agreement, which has long since occurred. The project is also contemplated by federal legislation known as Public Law 106-554, Appendix D, Division B, Section 103 (April 24, 2000). Subdivision (a) of Section 103 provides:

The Secretary of the Interior shall conduct a feasibility study for a Sacramento River, California, diversion project that is consistent with the Water Forum Agreement among the members of the Sacramento, California, Water Forum dated April 24, 2000, and that considers –

- (1) consolidation of several of the Natomas Central Mutual Water Company's diversions;
- (2) upgrading fish screens at the consolidated diversion;
- (3) the diversion of 35,000 acre-feet of water by the Placer County Water Agency;
- (4) the diversion of 29,000 acre-feet of water for delivery to the Northridge Water District;
- (5) the potential to accommodate other diversions of water from the Sacramento River, subject to additional negotiations and agreement among the Water Forum signatories and potentially affected parties upstream on the Sacramento River; and
- (6) an inter-tie between the diversions referred to in paragraphs (3), (4), and (5) with the Northridge Water District's pipeline that delivers water from the American River.

Third, for reasons suggested above in discussing the Water Forum Agreement, the Sacramento River diversion project is relatively benign from an environmental perspective. Essentially, the project would take water from the Sacramento River rather than the American River, thereby avoiding potential adverse environmental impacts on the American River, which, with its lower flows, is much more environmentally sensitive than the Sacramento River.

The County recognizes that there are regulatory hurdles that the Sacramento River diversion project must overcome before it can come to fruition. First, the project must complete the environmental review processes under both CEQA (with PCWA as lead agency) and the National Environmental Policy Act (NEPA) (with Reclamation as the federal lead agency). Among the approvals the project will need are (i) an exchange agreement between PCWA and Reclamation, (ii) an application from Reclamation to the State Water Resources Control Board for an additional point of "rediversion" at the SRWRS site, and (iii) actions by PCWA and Reclamation amending their water delivery contract to provide for delivery at the site. The project must also obtain a "Section 404" wetlands fill permit under the Clean Water Act from the United States Army Corps of Engineers (USACE). As the federal lead agency, Reclamation is obligated under section 7 of the federal Endangered Species Act to consult with both the United States Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) Fisheries to determine whether the direct or indirect effects of the project could jeopardize the continued existence of any federally listed endangered or threatened species or cause the destruction or adverse modification of the designated critical habitat of any such species. Given the ecological pressures on both aquatic and terrestrial species from continuing population growth and agricultural activities in California, there is always the chance that these environmental processes and Endangered Species Act (ESA) requirements could lead to delays, which could postpone the Placer Vineyards Specific Plan project from receiving its proposed long-term, or build-out, water supply. Further, although it is not anticipated, there is always the chance that alternatives other than PCWA's entire 35,000 AFA could be approved, in which case the Placer Vineyards project may receive less than the 11,500 AFA that has been identified.

The local agencies participating in the Sacramento River diversion project, namely, the City of Sacramento, PCWA, the City of Roseville, and Sacramento Suburban Water District (SSWD) intend to try to minimize the indirect effects of the water supply on federally listed terrestrial species by agreeing that they will not undertake to provide new water service from SRWRS Project facilities to any new projects unless such new development can demonstrate that it is in compliance with the ESA. Under such a self-imposed limitation, the partners in the Sacramento River diversion project would not provide water to any developer who cannot prove "ESA compliance" in connection with its development plans.

Finally, virtually all water supplies in California that have yet to be perfected suffer from some uncertainty due to combination of evolving environmental factors. One such factor is possible future species listings under the ESA and its State analogue, the California Endangered Species Act (CESA), which could affect both CVP and SWP operations, as well as the timing and extent of other water diversions throughout California.

Consistent with the obligation under the California Supreme Court's *Vineyard* decision to address possible sources of uncertainty for anticipated water supplies, the County notes several principles of California water law that create some amount of uncertainty for virtually any post-1914 surface water supply based on appropriative water rights, regardless of how firm the underlying appropriative water rights may be. Taken together, these principles provide that water supplies can, in effect, be reallocated over time, from human uses to environmental uses,

from relatively inefficient or wasteful human uses to more efficient and less wasteful human uses, from agricultural uses to municipal and industrial uses, and from Southern to Northern California. Notably, some of these principles could ultimately favor the urban customers of a Northern California supplier such as PCWA.

First, the California Constitution and the Water Code prohibit wasteful or unreasonable use of water. (See Cal. Const., art. X, § 2; see also Water Code § 100.) The California Constitution, Article X, Section 2, provides: "[T]he general welfare requires that the water resources of the State be put to beneficial use to the fullest extent of which they are capable, and that the waste or unreasonable use . . . of water be prevented . . .". Case law has interpreted this provision as follows: "What may be a reasonable beneficial use, where water is present in excess of needs, would not be a reasonable beneficial use in an area of great scarcity and great need. What is a beneficial use at one time may, because of changed conditions, become a waste of water at a later time." (See *Tulare Irrigation Dist. v. Lindsay-Strathmore Irrigation Dist.* (1935) 3 Cal.2d 489, 547.)

A second, and related, principle is that the limited availability of water for use in California means that those water resources that are available must be applied to the maximum beneficial use of which they are capable. (See Water Code § 100; see also 23 C.C.R. §§ 659-672.) As with the constitutional provisions discussed immediately above, the statutes and regulations embodying this latter principle recognize that societal notions of efficiency and beneficial use evolve over time, as the State's increasing population requires all water users to use their water supplies more wisely.

Third, there are watershed of origin and county of origin priorities. (See, e.g., Water Code §§ 1215.6, 1216.) These priorities were put in place primarily to assure Northern California and rural interests that the CVP and SWP, by sending water southward from the Delta, would not foreclose the eventual use of water by the Northern and rural entities as their demands for such water increased over time. The legal basis for the watershed and county of origin priorities derives from specific statutes or through conditions and reservations attached to appropriative rights issued by the State Water Resources Control Board (SWRCB). For example, in 1927, pursuant to statute, the State of California sought and obtained permits that reserve large amounts of water from watersheds such as the American River watershed for eventual assignment to water users within such watersheds.

Fourth, provisions of the California Water Code provide that in times of water shortage, municipal and industrial water users should have priority over agricultural users. (See Water Code § 106 et seq.) Although there is little case law on the subject, Water Code section 106.5 is thought the express the policy that municipalities are exempt from the due diligence requirement generally applicable to perfecting an appropriative right. Coupled with the interim appropriation permits issued pursuant to Water Code sections 1203 and 1462, it is argued that the exemption strikes a balance between the needs of municipalities to secure a reliable water supply and the constitutionally mandated requirement that water be placed for beneficial use to the maximum extent feasible. (Cal. Const., art. X, § 2.) Another policy consideration at work here is the pragmatic notion that, while agricultural lands can be temporarily fallowed during drought

conditions, houses and businesses cannot be similarly deprived of the minimum amounts of water needed for public health and safety purposes related to domestic water usage.

A final legal principle with the potential to require periodic adjustments of water allocations between human and environmental purposes is the public trust doctrine, which has historically been defined in relationship to the federal and state governments' sovereign ownership of navigable waters, tidelands, and submerged lands of navigable waters. In the early 1980s, the California Supreme Court adopted an expanded interpretation of trust uses and held that state sovereign ownership was not limited to the traditional triad (commerce, navigation, and fishing), but is rather an evolving legal doctrine designed to accommodate the public's needs as they change over time, so that the State Water Resources Control Board, in administering post 1914 appropriative water rights, must now account for environmental considerations (See *National Audubon Society v. Superior Court* (1983) 33 Cal.3d 419, 434-445).

Although details of the Sacramento River diversion project are still uncertain, based on the Court's decision, the County has decided to excerpt and summarize information regarding the diversion structure, treatment plant, and storage facilities from the *Sacramento River Water Reliability Study Initial Alternatives Report* in the following paragraphs.

The four primary alternatives currently under consideration in the Sacramento River Water Reliability Study (SRWRS) are the Elverta Diversion Alternative (see Figure 4.3.5-2), the Joint SRWRS-American River Basin Fish Screen and Habitat Improvement Project (ABFSHIP) Elverta Diversion Alternative, the American River Pump Station-Elverta Diversion Alternative (see Figure 4.3.5-3), which is discussed below under "Alternative Long-Term or Buildout Water Supply From the American River," and the American River Pump Station-Joint Sacramento-ABFSHIP Elverta Diversion Alternative (Personal Communication, Yung-Hsin Sun, Principal Engineer, Montgomery Watson Harza, February 2007). The differing scenarios were analyzed in the Sacramento River Water Reliability Study Initial Alternatives Report (Report) Final Version, dated March 2005. For purposes of the analysis contained herein, the differences between the two SRWRS EIR/EIS alternatives that include the ABFSHIP component, and the two that do not, are not material. These two alternatives with the ABFSHIP component assume that the proponents of the SRWRS would build a combined facility with the Natomas Mutual Water Company, which is pursuing upgrades to its own existing diversion from the Sacramento River, located at Elkhorn. For purposes of the analysis herein, the key issue with respect to each alternative is where PCWA would be taking its water: from either the Sacramento River or the American River. In ascertaining the impacts of PCWA's diversion, it does not matter whether the proponents of the SRWRS do or do not join forces with Natomas Mutual in building a single, combined facility. The same amounts of water would be drawn from the Sacramento and/or American Rivers regardless of whether the SRWRS proponents and Natomas Mutual build a combined facility.

According to the Report, the Elverta Diversion Alternative includes the construction of a joint diversion for PCWA, SSWD, and the Cities of Sacramento and Roseville. It will pump water from the Sacramento River to be treated at a proposed Elverta Water Treatment Facility. Under this alternative, new diversion facilities would be constructed near the existing Natomas Mutual Water Company's Elkhorn Diversion. Additionally, the water treatment facility, storage, and

pumping facilities would be located near the river with transmission lines connecting to the existing Cooperative Transmission Pipeline/Northridge Transmission Pipeline in Antelope, which serves the Sacramento Suburban Water District (SSWD), as well as extend north with service to Roseville and PCWA. The Sacramento connection would be separate with connection south of the distribution system. The connection to PCWA is shown on Revised Draft EIR Figure 3-5.

The Elverta Diversion Alternative would construct a water treatment facility on approximately 90 to 100 acres, located approximately one mile east of the Sacramento River pump station on Elverta Road (Figure 4.3.5-2). According to the Report the water treatment facility would "comprise conventional treatment processes, including a grit basin, flocculation/sedimentation basins, filters, clear tank, clearwell, backwash water basin, electrical building, chemical building, operations building, solids handling area, and storm water detention/habitat conservation program area." In order to accommodate future drinking water regulations, space has been reserved for an advanced oxidation process.

The pipeline associated with this alternative is proposed to traverse along Elverta Road approximately 5.5 miles before turning north along Sorrento Road/Pleasant Grove Road. After approximately 2.5 miles the pipeline will turn east along Riego Road/Baseline Road. The final connection to the Placer Vineyards Specific Plan project site would be along Baseline Road. This is the pipeline identified as "Long-term Surface Water Supply" shown on Revised Draft EIR Figure 3-5.

The following is a more detailed description of all of the various project components that are relevant to water supply in western Placer County. Please note that treatment plant capacity assumes treatment required by PCWA as well as other participants in the SRWRS:

- Constructing a new 235 million MGD (365 cubic feet per second (cfs)) in-river pier-type surface water intake (Elverta intake structure) with fish screens on the Sacramento River at river mile (RM) 74.6 in Sacramento County
- Realigning approximately 0.3 miles of the Garden Highway near the new Elverta intake structure
- Constructing a new 235 mgd Water Treatment Plant near the new Elverta intake facility on a site approximately 90 to 100 acres in size on the north side of Elverta Road
- Constructing approximately 1 to 4 miles of new underground twin 78-inch raw water pipelines from the new Elverta intake structure to the new Water Treatment Plant.
- Constructing approximately 27 to 30 miles of new underground treated water pipelines from the Water Treatment Plant to connection points within existing water distribution systems:
- 2.5 to 5.5 miles of 72-inch pipeline under or adjacent to Elverta Road, west of the East Drainage Canal in Sacramento County

- 5.7 to 8.7 miles of 96-inch pipeline along Elverta Road and the East Main Drainage Canal in Sacramento County
- 1.5 miles of 72-inch pipe on Sorrento Road in Sacramento County
- 1 mile of 72-inch pipe on Pleasant Grove Road In Placer County
- Approximately 3 miles of 72-inch pipeline under or adjacent to Baseline Road in Placer County
- Approximately 3.3 miles of 30-inch pipeline under Walerga Road in Placer and Sacramento counties
- Approximately 6.3 miles of 60-inch pipeline under Fiddyment Road in Placer County

# **Long-Term or Buildout Surface Water Supply Supplemental Analysis**

According to the preliminary findings of the Sacramento River Water Reliability Study Initial Alternatives Report (Report), implementation of this alternative could result in the following environmental effects. As noted above, an EIR/EIS is currently in process for this project that will substantially elaborate on the analysis contained in the Report summarized below. However, because this is the only recent public information, other than the very extensive analysis already included in the Placer Vineyards Revised Draft EIR, currently available to the County, it is provided in the spirit of disclosing the reasonably foreseeable future activities related to the project and the known environmental implications of those actions. This new information supplements the very detailed information already set forth in the Revised Draft EIR. It should also be noted, however, that, in addition to the supplemental analysis below, the Revised Draft EIR includes discussion of offsite infrastructure impacts in each topical area and includes mitigation measures that are applicable to offsite infrastructure construction, which are also applicable to water supply infrastructure effects:

**Biological Resources.** The California Native Plant Society (CNPS) and the California Natural Diversity Databases (CNDDB) were queried to identify all State and federally listed species that could occur within the area of study. Table D-3 of the SRWRS Initial Alternatives Report lists all identified Special-Status species that may occur within the study area, and is reprinted below.

Table D-3 Preliminary List of Special-Status Species in the SRWRS Study Area					
Common Name	Scientific Name	me Status Listing Agency Habitat			Habitat
		State	Federal	or Commission	
Botanical	Botanical				
Henderson's bent	Agrostis hendersonii		SoC	None (CNPS	Valley and foothill
grass				List 3)	Grassland
San Joaquin	Atriplex joaquiniana		SoC	None (CNPS	Chenopod scrub,
spearscale				List 1B)	meadows and

Preliminary List of Special-Status S  Common Name Scientific Name		Status		Listing Agency	Habitat
Common Name	Scientific Name	State	Federal	or Commission	Habitat
					seeps, playas, valley and foothill grassland/alkaline
Big-scale balsamroot	Balsamorhiza macrolepis var. macrolepis		SoC	None (CNPS List 1B)	Chaparral, cismontane woodland, valley and foothill grassland
Stebbins's morning-glory	Calystegia stebbinsii	Е	Е	CFGC, USFWS	Chaparral, cismontane woodland/gabbroic
Pine Hill ceanothus	Ceanothus roderickii	R	Е	CFGC, USFWS	Chaparral, cismontane woodland/ serpentinite or gabbroic
Red Hills soaproot	Chlorogalum grandiflorum		SoC	None (CNPS List 1B)	Chaparral, cismontane woodland, lower montane coniferous forest
Brandegee's clarkia	Clarkia biloba ssp. brandegeae		SoC	None (CNPS List 1B)	Chaparral, cismontane woodland
Hispid bird's- beak	Cordylanthus mollis ssp. hispidus		SoC	None (CNPS List 1B)	Meadows and seeps, playas, valley and foothill grassland
dwarf downingia	Downingia pusilla			None (CNPS List 2)	Valley and foothill grassland, vernal pools
Pine Hill flannelbush	Fremontodendron decumbens	R	Е	CFGC, USFWS	Chaparral, cismontane woodland/ serpentinite or gabbroic, rocky
Butte County fritillary	Fritillaria eastwoodiae		SoC	None (CNPS List 3)	Chaparral, cismontane woodland, lower montane coniferous forest
El Dorado bedstraw	Galium californicum ssp. sierrae	R	Е	CFGC, USFWS	Chaparral, cismontane woodland, lower montane

<b>Common Name</b>	Scientific Name	St	atus	Listing Agency	Habitat
		State	Federal	or Commission	
					coniferous forest
Boggs Lake hedge-hyssop	Gratiola heterosepala	Е	SoC	CFGC	Marshes and
neuge-nyssop					swamps (lake margins), vernal pools
Bisbee Peak rush-	Helianthemum		SoC	None (CNPS	Chaparral (often
rose	suffrutescens			List 3)	serpentinite,
	33			,	gabbroic,
					or Ione soil)
Ahart's dwarf	Juncus leiospermus		SoC	None (CNPS	Valley and foothil
rush	var. aharti			List 1B)	grassland
Red Bluff dwarf	Juncus leiospermus		SoC	None (CNPS	Chapparal,
rush	var. leiospermus			List 1B)	cismontane
	1			,	woodland,
					meadows
					and seeps, valley
					and foothill
					grasslands,
					vernal pools/
					vernally mesic
Dubious pea	Lathyrus sulphureus			None (CNPS	Cismontane
	var. argillaceus			List 3)	woodland, lower
					montane
					coniferous
					forest, upper
					montane
					coniferous forest
Legenere	Legenere limosa		SoC	None (CNPS List 1B)	Vernal pools
Pincushion	Navarettia myersii		SoC	None (CNPS	Vernal pools
navarettia	ssp. myersii			List 1B)	
Sacramento	Orcuttia viscida	Е	E	CFGC, USFWS	Vernal pools
Orcutt grass					
Sanford's	Sagittaria sanfordii		SoC	None (CNPS	Marshes and
arrowhead				List 1B)	swamps
					(assorted shallow
			_		freshwater)
Layne's ragwort	Senecio layneae	R	T	CFGC, USFWS	Chaparral,
					cismontane
					woodland/
					serpentinite
					or gabbroic, rocky

Common Name	Scientific Name				Uak!tat
Common Name	Scientific Name	State	atus Federal	Listing Agency or Commission	Habitat
El Dorado mule-	Wyethia reticulate	State	SoC	None (CNPS	Chaparral,
ears	Wyeima renemane		boc	List 1B)	cismontane
our s				List 1D)	woodland, lower
					montane
					coniferous forest
Fisheries		l			
Winter-run	Oncorhynchus	Е	Е	NOAA Fisheries	River
chinook salmon	tshawytscha				
Spring-run	Oncorhynchus	T	T	NOAA Fisheries	River
chinook salmon	tshawytscha				
Fall-run chinook	Oncorhynchus		C	NOAA Fisheries	River
salmon	tshawytscha				
Late-fall-run	Oncorhynchus		С	NOAA Fisheries	River
chinook salmon	tshawytscha				
Steelhead	Oncorhynchus mykiss		T	NOAA Fisheries	River
Green sturgeon	Acipenser	SSC	C	NOAA Fisheries	River
	medirostris				
Delta smelt	Hypomesus		T	USFWS	River/estuary
	transpacificus				
Sacramento	Pogonichthys	SSC	SoC	USFWS	River/estuary
splittail	macrolepidotus				
Longfin smelt	Spirinchus	SSC		CFGC	Estuary
	thaleichthys				
River lamprey	Lampetra ayresi	SSC		CFGC	River/estuary
Wildlife		1			T
Valley elderberry	Desmocerus		T	USFWS	Elderberry shrubs
longhorn	californicus				
Beetle	dimorphut				
Vernal pool fairy	Branchinecta lynchi		T	USFWS	Vernal pool
shrimp					
Vernal pool	Lepidurus packardi		T	USFWS	Vernal pool
tadpole shrimp	~-	~~~		ana a	
Western pond	Clemmys marmorata	SSC		CFGC	Canals, ponds,
turtle	TTI III		<b>T</b>	TIGENTIG	rivers
Giant garter snake	Thamnophis gigas		T	USFWS	Canals, rice fields,
C-116	A 7		C	HOEWO	marshes
California tiger	Ambystoma		С	USFWS	Vernal pool,
salamander	califoriense			CECC	grasslands, uplands
Bank swallow	Riparia riparia	T		CFGC	River banks
Tri-colored	Agelaius tricolor	SSC		CFGC	Marshes, wetlands,
blackbird		-		CECC	ponds
California yellow-	Coccyzus americanus	Е		CFGC	Dense riparian
billed cuckoo	occidentalis	I			woodlands, scrub

Common Name	f Special-Status Specie Scientific Name		atus	Listing Agency	Habitat
		State	Federal	or Commission	
Burrowing owl	Athene cunicularia	SSC		CFGC	Grasslands, agricultural fields
Swainson's hawk	Buteo swainsoni	Т		CFGC	Rivers, riparian, grasslands, agricultural fields
Northern harrier hawk	Circus cyaneus	SSC		CFGC	Fields, marshes
Cooper's hawk	Accipiter cooperi	SSC		CFGC	Woodlands, scrub

#### State and Federal Status Key

 $E-Endangered \ T-Threatened \ C-Candidate \ SoC-Species \ of \ Concern \ SS-Species \ of \ Special \ Concern$ 

### **Listing Agency Key**

CFGC – California Fish and Game Commission

CNPS List 1B - Rare, threatened, or endangered in California and elsewhere.

CNPS List 2 - Rare, threatened, or endangered in California, but more common elsewhere.

CNPS List 3 - More information needed (plant is on CNPS Review List)

NOAA - National Oceanic and Atmospheric Administration

USFWS - United States Fish and Wildlife Service

Source: Sacramento River Water Reliability Study Initial Alternatives Report

The Report identified potentially significant terrestrial species impacts due to habitat loss through the fragmentation and elimination of wildlife habitat. Additionally, impacts to vernal pools could result from treated water pipelines traversing wetland habitat that has the potential to impact fairy shrimp and California tiger salamander, which are federally threatened species.

There would be impacts directly associated with diversion of water from the Sacramento River through pumping and conveyance of water through associated pipelines to the water treatment facility. According to the Report there will be long-term operational impacts to fisheries and riparian habitat. Specifically, water flows and temperature could be altered in a way that would result in alterations to anadromous fish spawning and rearing. Aquatic habitat availability may increase or decrease depending on temperature fluctuations and flow rates in the area of the pumping station. Flow rates and temperature fluctuations could decrease reproductive activities as well as impacts to maturation of cold water fisheries, such as anadromous species.

**Hydrology/Water Quality.** The Report recommended additional analysis to identify any potential effects. Potential impacts could include a reduction in downstream dilution of pollutants. Potential water quality issues, however, are considered to be relatively minor, due in part to the relatively lower water quality of the Sacramento River in comparison to that of the water in the Lower American River. Additional analysis would identify the potential for operations to violate any federal, state or local water quality guidelines or standards.

**Recreation.** The pump station would protrude directly into the Sacramento River resulting in restrictions to recreation in the vicinity of the diversion. Implementation of this alternative would result in potential impacts to the quality of recreation.

Land Use. Implementation of the proposed alternative may require coordination with the Sacramento International Airport to resolve potential conflicts with the current Airport Land Use Plan. According to the Report, there would be no other conflicts with existing or planned land uses in the area. Although not discussed in the Report, the alternative would also permanently remove approximately 100 acres of agricultural land from production for water treatment and storage facilities. Operation of the water treatment facility would also entail operation of machinery and equipment that could have visual and noise effects. In addition, various chemicals would be used and waste materials produced that could prove hazardous. However all such activities would be carried out in strict adherence with established regulations for their use, storage and disposal. The 100 acre site is currently rural in character, zoned AG-80 (Agricultural, 80 acre minimum parcel size) by Sacramento County, and removed from any developed areas that could be exposed to any of the effects of the proposed facility.

# **Long-Term or Buildout Surface Water Supply Regulatory Environment**

The following information concerning the regulatory environment for the long-term or buildout surface water supply from the Sacramento River is excerpted from PCWA's Sacramento River Water Reliability Study Engineering Report, November 2006. Although an EIR/EIS is currently in process that will elaborate on the regulatory environment for the project, the information in the following paragraphs is currently the best information available to the County and is provided to disclose in a preliminary manner the steps necessary to bring the water supply on line by 2016.

As part of the preliminary design phase of the work, consultation would be initiated with numerous permitting agencies to begin discussion of project-specific conditions and design criteria that would need to be included in the design of ultimate facilities in order to obtain permits from these agencies. These contacts would not result in permits, but rather would identify the conditions and requirements for permit applications to be submitted as part of the final design when more detailed engineering design is available. This would include coordination with the following agencies:

- USACE (Section 404/10 Permit)
- Department of Health Services (DHS) (Water Supply Permit)
- California Department of Transportation (Encroachment Permit)
- The Reclamation Board (Encroachment Permit)
- Central Valley Regional Water Quality Control Board (CVRWQCB) (National Pollutant Discharge Elimination System (NPDES) Permit)
- Sacramento and Placer Counties (Encroachment Permits)
- Cities of Sacramento and Roseville (Encroachment Permits)

In addition to these consultations, several other permits and consultations would be completed or obtained during this phase of work, including the following:

- United States Coast Guard (USCG) (Aid to Navigation)
- Federal Aviation Administration (FAA)/Sacramento County Airport Service (Form 7460-1)
- Union Pacific Railroad (UPRR) (Encroachment Permit)
- (Cal-OSHA) (Gas Classifications)
- SAFCA (Flood Impact Consult)
- Reclamation District 1000 (Flood Impact Consult)
- County Sanitation District 1 (CSD-1)/Sacramento County Department of Water Resources (Sewer/Storm Drain Connection)
- Sacramento County (General Use and Building Permits) (to the extent required by law)

As part of the final design, permit applications would be prepared for the agencies that were only consulted during the enhanced engineering analysis. This would include coordination with the following:

- USACE (Section 404/10 Permit)
- DHS (Water Supply Permit)
- California Department of Transportation (Encroachment Permit)
- The Reclamation Board (Encroachment Permit)
- CVRWQCB (NPDES Permit)
- Sacramento and Placer Counties (Encroachment Permits)
- Cities of Sacramento and Roseville (Encroachment Permits)

In addition to the permits above, several other permits and consultations would be ready to be completed or obtained during the final design, including the following:

- California Department of Fish and Game (CDFG) (Streambed Alteration Agreement)
- California State Lands Commission (Letter for Avoid Land Use Lease)
- CVRWQCB (Section 401 Water Quality Certification)
- SWRCB (Notice of Intent (NOI) for Stormwater and Low Threat Discharges)
- SWRCB (Approval of application from Reclamation for point of rediversion)
- Sacramento Metropolitan Air Quality Control District (Generator Permit)
- Placer County Air Pollution Control District (PCACD) (Generator Permit)
- Sacramento County (Tree Removal Permit)
- Placer County (Tree Removal Permit)

#### **BACKUP GROUNDWATER SUPPLY**

A backup groundwater supply is proposed that would be sufficient to provide a redundant water source equal to at least 25% of the required water supply on a maximum daily demand basis. This contingency is based on the Bureau of Reclamation's ability to exercise a maximum dry year reduction in CVP municipal water supply of 25%, but would not be required if other non-CVP sources of water (e.g., PCWA's Middle Fork Project water rights) were ultimately used to supply the Placer Vineyards Specific Plan area. Impacts related to use of groundwater as a redundant water source are addressed in the Revised Draft EIR under Impact 4.3.3-7 on page 4.3-80. The Placer Vineyards EIR relies on the analysis contained in PCWA's Integrated Water Resources Plan (IWRP) and Western Placer County Groundwater Storage Study. A detailed summary of these reports and their conclusions is included under Final EIR Response to Comment 15K.

#### ALTERNATIVE LONG-TERM OR BUILDOUT SURFACE WATER SUPPLY FROM THE AMERICAN RIVER

This alternative long-term or buildout surface water supply consists of the withdrawal of PCWA's CVP entitlement discussed above from the American River system, of which Placer Vineyards would receive approximately 11,500 AFA. The Revised Draft EIR assumed that this alternative water supply would be withdrawn at Folsom Reservoir; however, the *Sacramento River Water Reliability Study* (SRWRS) now assumes that the water would most likely be withdrawn at PCWA's new American River Pump Station. This change in diversion point has de minimus effect on the analysis performed for the in-stream effects of diversion, as modeled and presented in the Revised Draft EIR because the American River Pump Station is located close to the upper reaches of Folsom Reservoir, and because the Lower American River below Folsom Reservoir is the most environmentally sensitive portion of the American River and most important from a regulatory standpoint. Consistent with the Water Forum Agreement, any diversion of the 35,000 AFA CVP supply from the American River would require PCWA to determine that it is not feasible to implement the Sacramento River diversion.

Because water to be withdrawn at the new American River Pump Station would not be considered CVP water (i.e., it does not come from federally stored water such as water behind Folsom Dam), the withdrawal of the 35,000 AFA at this location would require a water supply exchange with other agencies currently withdrawing water at Folsom Dam. PCWA currently contracts up to 84,000 AF of Middle Fork Project water to three entities that withdraw the contracted water at Folsom Dam. The three entities are the San Juan Water District (up to 25,000 AF), City of Roseville (up to 30,000 AF), and Sacramento Suburban Water District (up to 29,000 AF). It has been proposed that PCWA would exchange 35,000 AF of the contracted Middle Fork water for CVP supply, thus allowing CVP water to be withdrawn at Folsom Dam and Middle Fork Project water to be withdrawn at the American River Pump Station. However, CVP water is subject to the Bureau of Reclamation's ability to exercise a maximum dry year reduction in supply of 25%, which would require PCWA to provide additional assurances to prospective CVP water recipients, using Middle Fork Project water as the assured supply backup.

Because this is an alternative supply, it does not appear with the rest of the water supply analysis in the Revised Draft EIR. It is found in Section 6.3.5 under "Alternatives". A full 35,000 AFA diversion is modeled and evaluated for the Placer Vineyards Specific Plan project, including effects on water resources, biological resources, cultural resources, and recreational resources resulting from the withdrawal from the American River system. No analysis of a diversion structure, pumps, or water treatment facilities was provided in the Revised Draft EIR; however, a description of the facilities proposed at the new Pump Station and an analysis of those facilities, based on the *Sacramento River Water Reliability Study Initial Alternatives Report*, are provided in the Supplement to Revised Draft EIR Section 6.3.5 "Utility Alternatives" that is provided below. The proposed Folsom Reservoir diversion is also analyzed in the Supplement to Section 6.3.5. The general impacts of constructing the American River Pump Station were extensively analyzed in the 2002 EIS/EIR for that project, as described earlier in this chapter.

# ALTERNATIVE INFRASTRUCTURE TO DELIVER AN ALTERNATIVE LONG-TERM OR BUILDOUT SURFACE WATER SUPPLY

Section 6.3.5 of the Revised Draft EIR describes an alternative approach to delivering a longterm or buildout water supply to the Specific Plan area. The proposal would eliminate the limitation or "bottleneck" created by the 10 MGD Roseville-owned pipeline limitation described above under the immediate or initial water supply and would permit delivery of larger quantities of water to the Specific Plan area by way of new PCWA-owned pipelines. The immediate source for the supply would be PCWA's unused American River Middle Fork Project water to be diverted at PCWA's new permanent American River Pump Station. This is the same water entitlement as the initial surface water supply discussed above; however, it would not be constrained by existing infrastructure such as the Roseville pipeline limitation, or prior or pending agreements with other water suppliers, as in the case of the secondary initial surface water supply. Its delivery would be fully within the control of PCWA and would be limited in amount only by competition from other projects in western Placer County (e.g., the proposed Placer Ranch Specific Plan). However, as shown on Table 4.3.5-2 this supply would be inadequate to serve projected buildout of western Placer County and in the long run would require supplementation with water from the Sacramento River diversion, or in the case of the Alternative Long-term water supply, from the American River. In the event PCWA's American River Pump Station became the source of the supplemental water, a parallel pipeline would be constructed along the same course analyzed herein.

As shown on Table 4.3.5-2, beginning in 2011, approximately 43.3 MGD would be available from the Sunset, Foothill, and Ophir Water Treatment Plants from PCWA sources for delivery to western Placer County, which would be sufficient to supply projected development through 2018 (or approximately 35,000 equivalent dwelling units). The Sacramento River Water Treatment Plant (Long-Term or Buildout Water Supply) is projected to be operational in 2016, which would supply adequate water through the full buildout projection. Please note that the Table shows water commitments rather than actual demand. Actual demand would likely be less and would occur 18 to 24 months after water is committed (i.e., the difference in time between commitment and water delivery).

Because this is an alternative approach to water supply, it does not appear with the rest of the water supply analysis in the Revised Draft EIR. It is found in Section 6.3.5 under "Alternatives". Since development of the alternative infrastructure diagram (Revised Draft EIR Figure 6-14), modifications have been made in pipeline alignment and approach to surface water delivery. An Updated Revised Draft EIR Figure 6-14 is presented herein and the analysis for the facility has been revised and updated in the Supplement to Revised Draft EIR, Section 6.3.5 "Utility Alternatives" that is provided below.

# **IMPACTS AND MITIGATION MEASURES**

Consistent with direction provided by the Court in the *Vineyard* decision, the County has used available information to describe probable sources of water and to disclose the reasonably foreseeable impacts of supplying water to the project. The County has also identified alternative sources of water supply, in the short-term as well as the long-term. Notwithstanding some uncertainty, as described in this chapter, there is a reasonable likelihood that the project's water supply will be available and adequate for project buildout. As shown on Table 4.3.5-1, an immediate supply is available for at least the first four to five years of activity. A secondary supply has also been identified that would extend the initial supply through approximately 2020. A long-term supply has been identified that is being actively pursued in accordance with the Water Forum Agreement. The known probable effects of this supply as well as the initial supplies have been fully evaluated in Sections 4.3, 4.4, 4.6 and 4.11 of the Revised Draft EIR. This analysis has been further supplemented in the Final EIR responses to comments and herein. Finally, alternative supplies have been identified that could eliminate infrastructure limitations on the initial supply, permitting it to be used for a longer period of time, and two American River long-term alternative options have been identified in the event problems develop with the preferred long-term supply option.

Although there is a very low likelihood that curtailment of the initial supply or long-term or buildout supply would occur, because uncertainties remain, and consistent with Court's direction, the following paragraphs contain an analysis of the potential environmental effects of water supply curtailment. The first discussion pertains to the potential for a permanent curtailment of the long-term or buildout water supply after it has been developed and is being received. As noted, the likelihood of this occurring is remote. Once developed, barring a major shift in climate or policy or the future application of the California water law principles described earlier in a manner significantly more restrictive than presently applied, it is assumed that the water supply would continue to flow to PCWA without interruption, consistent with its contract with Reclamation and PCWA's Middle Fork Project water rights.

The second discussion pertains to implementation of Mitigation Measures 4.11.7-1a and 4.11.7-1c temporarily curtailing development until the long-term supply or another source of potable water became available consistent with CEQA Guidelines Section 15126.4, subdivision (a)(1)(D), which requires analysis of possible significant impacts resulting from mitigation measures.

# 4.3.3-14A The long-term surface water supplies could yield less water than is projected, resulting in a permanent curtailment in development in western Placer County

In the long-term, the Placer Vineyard Specific Plan area would utilize water obtained from new diversion infrastructure connecting the Specific Plan area with the Sacramento River, or alternatively, the American River. If water from the Sacramento or American Rivers does not materialize because the proposed diversions are not constructed, or the amount of water available is inadequate to meet all of PCWA's service commitments, a permanent curtailment of development within the Specific Plan area could occur. Such curtailment could result from climatic or other environmental conditions that are unforeseen and cannot be predicted or from unexpected regulatory or legal developments. Generally the potential impacts of a permanent curtailment can be grouped into three categories:

- Impacts associated with infrastructure construction and the provision of services.
- Impacts associated with the pattern of development. Examples include land use patterns that
  are discontiguous and the effects such patterns may have on land use compatibility and other
  resources.
- Economic Impacts. CEQA documents typically do not include an analysis of economic impacts of a project, unless the economic impact would bring about physical changes to the environment (CEQA Guidelines Section 15131). However, consistent with CEQA's informational purpose, a brief discussion of such effects is provided below.

**Infrastructure.** Because of size of the Specific Plan area, with multiple owners, subject to multiple criteria as to parcel development (e.g., potential shifts in the market demand for various housing types and non-residential uses) project buildout would not occur in discrete phases. To ensure that the development of infrastructure occurs prior to the development of any given parcel, a Development Agreement (DA) has been drafted between the County and the property owners (identified in the DA as Developers) of the Specific Plan area. If the Board of Supervisors approves the Placer Vineyards Specific Plan, the DA will be approved as a part of the project entitlements. The proposed DA establishes timing requirements for the development of the following project elements: Core Backbone Infrastructure, Remaining Backbone Infrastructure, and Permit-Driven or As Warranted Infrastructure. Core Backbone Infrastructure consists of major roadway improvements, sewer, water and recycled water improvements within such roadways and certain off-site sewer and water improvements (DA Exhibit 3.5, which is reprinted below). DA Exhibit 3.6, also reprinted below, sets out the infrastructure that is considered part of the Remaining Backbone as well as the Permit-Driven or As Warranted infrastructure elements. As set forth in the DA, prior to the issuance by the County to the Developer of the first building permit the Core Backbone Infrastructure needs to be under construction. As development continues, the issuance of the 7,000<sup>th</sup> building permit would trigger the requirement that the Remaining Backbone Infrastructure be in place. In addition to the infrastructure set forth as Core and Remaining Backbone, specific required infrastructure requirements are set out for specific locations, the construction of which meets the particular requirements for issuance of a permit or to fulfill traffic/circulation warrant requirements.

Development Agreement Exhibit 3.5 Core Backbone Infrastructure	
Road Segment/ Location	Improvement
Road/ Traffic Signal Improvements	
Base Line Road – Newton Street to Walerga Road	Widen/ reconstruct existing road to 4 lane section, including applicable intersection widening, with curb, gutter, and sidewalk on south side of street, and median landscaping.
Base Line Road – Pleasant Grove Road (E) to Newton Street	Widen/ reconstruct existing road to 4 lane section, including applicable intersection widening, and median landscaping.
Base Line Road – Sutter County Intersection Improvements	
Watt Avenue – Placer County / Sacramento County Line to Base Line Road	Widen/ reconstruct existing road to 4 lane section, including applicable intersection widening, and landscape median. Remove existing bridge and construct new bridge over Dry Creek. Construct sidewalk / trail on west side of street between West Dyer Lane and Base Line Road only.
Watt Avenue – Tolman Lane to Placer County/	Widen / reconstruct existing road to 4 lane section,
Sacramento County Line	including applicable intersection widening.
West Dyer Lane - Base Line Road to Watt Avenue	Construct 4 – lane arterial road with curb and gutter on both sides of street, sidewalk on north side of street only, and landscape median.
16 <sup>th</sup> Street – West Dyer Lane to Base Line Road	Construct easterly half section of 4 lane arterial road section (2 lanes) with curb, gutter, and sidewalk on east side of street.
18 <sup>th</sup> Street – Locust Road to West Dyer Lane	Construct 2- lane collector street with curb, gutter, and sidewalk on both sides of street.
Palladay Road/ A Street – Fire Station Access	Construct 2 -12 foot lanes with 2- foot AC shoulders.
Base Line Road/ Walerga Road Intersection	Modify/ reconstruct existing traffic signal
Base Line Road/ Watt Avenue Intersection	Modify/ reconstruct existing traffic signal
Base Line Road/ 16 <sup>th</sup> Street Intersection	Construct traffic signal
Base Line Road/ West Dyer Lane Intersection	Construct traffic signal
Base Line Road/ Locust Road Intersection	Construct traffic signal
Base Line Road/ Pleasant Grove Road (East)	Construct traffic signal
Intersection	
Base Line Road/ Pleasant Grove Road (West)	Construct traffic signal
Intersection	
Base Line Road/ Natomas Road Intersection	Construct traffic signal
Watt Avenue/ West Dyer Lane Intersection	Construct traffic signal
Watt Avenue/ PFE Road Intersection	Construct traffic signal
Major Onsite Improvement	Construct traffic signal
Sanitary Sewer Improvements	
Watt Avenue- West Dyer Lane to PFE Road	Construct 16" sanitary force main and appurtenances.
West Dyer Lane – Base Line Road to Watt Avenue	Construct gravity trunk sewer system (w/ pipe sizes from 8" to 36") and appurtenances. Construct

Development Agreement Exhibit 3.5 Core Backbone Infrastructure	
Road Segment/ Location	Improvement
	16" sanitary sewer force main and appurtenances.
16 <sup>th</sup> Street – West Dyer Lane to Base Line Road	Construct gravity trunk sewer system (w/ pipe
•	sizes from 8" to 15") and appurtenances.
18 <sup>th</sup> Street – Locust Road to West Dyer Lane	Construct gravity trunk sewer system (w/ pipe
	sizes from 8" to 10") and appurtenances
Locust Road	Construct gravity trunk sewer system (w/ pipe
	sizes from 12" to 42") and appurtenances.
	Construct 16" sanitary sewer force main and
	appurtenances.
Outside Road Right-of-Way – Between West	Construct gravity trunk sewer system (w/ pipe
Dyer Lane and Locust Road	sizes from 8" to 42") and appurtenances. Construct
	16" sanitary sewer force main and appurtenances.
Outside Road Right-of-Way- Adjacent to east	Construct 7.33 MGD sanitary sewer lift station,
side of Locust Road, north of 18 <sup>th</sup> Street	appurtenances, including emergency storage
DEED 1 Wash D C 1	facility.
PFE Road – Watt Avenue to Dry Creek	Construct 16" sanitary sewer force main and
Wastewater Treatment Plant	appurtenances including connection at the Dry
W . I	Creek Wastewater Treatment Plant.
Water Improvements	I a
Base Line Road – Watt Avenue to Walerga Road	Construct 24" water pipeline with service stubs
D. I. D. I. M. G. G. W. M.	and appurtenances.
Base Line Road – Newton Street to Watt Avenue	Construct 36" water pipeline with service stubs
Wett Assessed DEE Dood to Door Line Dood	and appurtenances.
Watt Avenue- PFE Road to Base Line Road	Construct 24" water pipeline with service stubs and appurtenances.
West Dyer Lane – Base Line Road to Watt	Construct 16" water pipeline with service stubs
Avenue	and appurtenances.
16 <sup>th</sup> Street – West Dyer Lane to Base Line Road	Construct 12" water pipeline with service stubs
10 Street - West Dyer Lane to Dase Line Road	and appurtenances.
18 <sup>th</sup> Street – Locust Road to West Dyer Lane	Construct 12" water pipeline with service stubs
10 Sheet Books Roll to West Byer Euro	and appurtenances.
Palladay Road/ A Street – Fire Station Access	Construct 16" water pipeline with service stubs
	and appurtenances.
3 Locations – A) Adjacent to south side of Base	Construct 3.0 MG water storage tank and backup
Line Road 5300 feet west of Watt Avenue, B)	drought reliability system (Total – 3 storage tanks)
Adjacent to west side of Palladay Road 2500 feet	
south of Base Line Road, C) Adjacent to south	
side of West Dyer Lane 2900 feet east of 16 <sup>th</sup>	
Street.	
PFE Road – Watt Avenue to Cook Riolo Road	Construct 16" water pipeline with service stubs
	and appurtenances.
Base Line Road – Newton Street to Walerga	Construct gravity trunk storm drain collection
Road	system (w/ pipe sizes from 18" to 54") including
	droop inlets, manholes, cross culverts, inlet
	structures, outlet structures, water quality facilities
	and appurtenances.

Development Agreement Exhibit 3.5 Core Backbone Infrastructure	
Road Segment/ Location	Improvement
Base Line Road – Pleasant Grove Road (E) to Newton Street	Construct gravity trunk storm drain collection system (w/ pipe sizes from 18" to 54") including droop inlets, manholes, cross culverts, inlet structures, outlet structures, water quality facilities, and appurtenances.
Watt Avenue – Placer County/ Sacramento County Line to Base Line Road	Construct gravity trunk storm drain collection system (w/ pipe sizes from 18" to 60") including droop inlets, manholes, cross culverts, inlet structures, outlet structures, water quality facilities, and appurtenances.
Watt Avenue – Tolman Lane to Placer County / Sacramento County Line	Construct gravity trunk storm drain collection system (w/ pipe sizes from 18" to 48") including droop inlets, manholes, cross culverts, inlet structures, outlet structures, water quality facilities, and appurtenances.
West Dyer Lane – Base Line Road to Watt Avenue	Construct gravity trunk storm drain collection system (w/ pipe sizes from 18" to 72") including droop inlets, manholes, cross culverts, inlet structures, outlet structures, water quality facilities, and appurtenances.
16 <sup>th</sup> Street – West Dyer Lane to Base Line Road	Construct gravity trunk storm drain collection system (w/ pipe sizes from 18" to 54") including droop inlets, manholes, cross culverts, inlet structures, outlet structures, water quality facilities, and appurtenances.
18 <sup>th</sup> Street – Locust Road to West Dyer Lane	Construct gravity trunk storm drain collection system (w/ pipe sizes from 18" to 54") including droop inlets, manholes, cross culverts, inlet structures, outlet structures, water quality facilities, and appurtenances.
Recycled Water Improvements	
Walerga Road – Adjacent to east side of road south of Dry Creek	Construct recycled water booster pump facility.
Walerga Road – South side of Dry Creek to Base Line Road	Construct 24" recycled water pipeline and appurtenances.
Base Line Road – Newton Street to Walerga Road	Construct 24" recycled water pipeline and appurtenances.
Watt Avenue – West Dyer Lane to Base Line Road	Construct 24" recycled water pipeline and appurtenances.
West Dyer Lane – Base Line Road to Watt	Construct 24" recycled water pipeline and appurtenances.
16 <sup>th</sup> Street – West Dyer Lane to Base Line Road	Construct 24" recycled water pipeline and appurtenances.
18 <sup>th</sup> Street – Locust Road to West Dyer Lane	Construct 12" recycled water pipeline and appurtenances.
Southwest corner of the West Dyer Lane/ 16 <sup>th</sup>	Construct recycled water storage tank and

Road Segment/ Location	Improvement
Street intersection	appurtenances. Construct recycled water booster pump station.
Dry Utility Improvements	
Base Line Road – Newton Street to Walerga Road	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.
Base Line Road – Placer County/ Sutter County Line to Newton Street	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.
Base Line Road – Sutter County Intersection Improvements	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.
Watt Avenue – Placer County/ Sacramento County Line to Base Line Road	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.
West Dyer Lane- Base Line Road to Watt Avenue	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.
16 <sup>th</sup> Street – West Dyer Lane to Base Line Road	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.
18 <sup>th</sup> Street- Locust Road to West Dyer Lane	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.
Miscellaneous Improvements	
All areas of new construction.	Erosion control features including straw wattles, gravel bag inlet protection and hydroseeding.

#### Notes:

• All utility pipe, storage tank, and lift station sizes are based on preliminary conceptual designs and subject to change during final design and public agency approval process.

Source: Placer Vineyards Specific Plan Development Agreement, November 2007

Development Agreement Exhibit 3.6							
Remaining Backbone Infrastructure  A. PERMIT-DRIVEN INFRASTRUCTURE							
Road Segment / Location	Improvement	Commencement of Construction					
Road-Traffic Signal Improvements at 7,000 <sup>th</sup> BP							
Base Line Road – Watt Avenue to Walerga Road	Widen road to six-lane thoroughfare section, including applicable intersection widening, with curb and gutter on north side of street and with pedestrian overcrossing in location to be determined.	Building Permit for 7,000 <sup>th</sup> Residential Unit					
East Dyer Lane - Watt Avenue to Baseline Road	Construct 4-lane arterial road section with curb and gutter on both sides of street, sidewalk on west side of street only, and median landscaping, to the extent not then constructed by adjacent Properties (i.e., Properties 1, 2, 3, 5A, 5B and 6).	Building Permit for 7,000 <sup>th</sup> Residential Unit					
Watt Avenue – Placer County/Sacramento County Line to Base Line Road	Widen road to six-lane thoroughfare section, including applicable intersection widening, with curb and gutter on both sides of street.	Building Permit for 7,000 <sup>th</sup> Residential Unit					
Watt Avenue - Tolman Lane to Placer County / Sacramento County Line	Widen road to six-lane thoroughfare section, including applicable intersection widening, with curb, gutter, and sidewalk on both sides of street.	Building Permit for 7,000 <sup>th</sup> Residential Unit					
Base Line Road / Walerga Road Intersection	Modify / reconstruct existing traffic signal	Building Permit for 7,000 <sup>th</sup> Residential Unit					
Base Line Road / Watt Avenue Intersection	Modify / reconstruct existing traffic signal	Building Permit for 7,000 <sup>th</sup> Residential Unit					
Watt Avenue / West Dyer Lane Intersection	Modify / reconstruct existing traffic signal	Building Permit for 7,000 <sup>th</sup> Residential Unit					
Road / Traffic Signal Improvements at 10,000th BP							
Base Line Road – Pleasant Grove Road (E) to Watt Avenue	Widen road to six-lane thoroughfare section, including applicable intersection widening, with curb and gutter on both sides of street.	Building Permit for 10,000 <sup>h</sup> Residential Unit					
Base Line Road / 16 <sup>TH</sup> Street Intersection	Modify / reconstruct existing traffic signal	Building Permit for 10,000 <sup>th</sup> Residential Unit					
Base Line Road / West Dyer Lane Intersection	Modify / reconstruct existing traffic signal	Building Permit for 10,000 <sup>th</sup> Residential Unit					

# Development Agreement Exhibit 3.6 Remaining Backbone Infrastructure

# A. PERMIT-DRIVEN INFRASTRUCTURE

Road Segment / Location	Improvement	Commencement of	
		Construction	
Base Line Road / Locust Road	Modify / reconstruct existing	Building Permit for 10,000 <sup>th</sup>	
Intersection	traffic signal	Residential Unit	
Base Line Road / Pleasant	Modify / reconstruct existing	Building Permit for 10,000 <sup>th</sup>	
Grove Road (East) Intersection	traffic signal	Residential Unit	
Base Line Road / Pleasant	Modify / reconstruct existing	Building Permit for 10,000 <sup>th</sup>	
Grove Road (W) Intersection	traffic signal	Residential Unit	
16 <sup>TH</sup> Street - from West Dyer	Construct 4-lane arterial road	Building Permit for 10,000 <sup>th</sup>	
Lane to Sacramento County	section with curb and gutter on	Residential Unit	
	both "sides of street, sidewalk on		
	west side of street only, and		
	median landscaping.		
Palladay Road – from West	Construct 4 lane arterial road	Building Permit for 10,000 <sup>th</sup>	
Dyer Lane to Sacramento	section (or balance of such	Residential Unit	
County	section) with curb, gutter and		
	sidewalk on both sides of street,		
	and median landscaping.		
Locust Road - from 18 <sup>th</sup> Avenue	Construct 4 lane arterial road	Building Permit for 10,000 <sup>th</sup>	
to Sacramento County	section with curb, gutter and	Residential Unit	
	sidewalk on both sides of street,		
	and median landscaping.		

B. PROJECT-SPECIFIC INFRASTRUCTURE			
Road Segment / Location	Affected	Improvement	Commencement of
	Properties		Construction
Road Improvements			
East Dyer Lane - Within Property	IA, 1B, 2, 3, 5B and 6	Within Property, Construct 4-lane arterial road section with curb and gutter on both sides of street, sidewalk on west side of street only, and median landscaping.	IA: First Small-Lot Final Map West of North / South Entry Road from Base Line Road  1B, 2, 5B and 6: First Small-Lot Final Map within Property  3: First Street Connection to East Dyer Lane
East Dyer Lane - Extension to Either Watt Avenue or Base Line Road	2	Construct extension of 4- lane arterial road section to either Watt or Base Line with curb and gutter on both sides of street, sidewalk on west side of street only, and median landscaping.	First Small-Lot Final Map within Property

B. PROJECT-SPECIFIC INFRASTRUCTURE					
Road Segment / Location	Aff	ected perties	Improvement		Commencement of Construction
East Dyer Lane - Watt Avenue to Base Line Road		1B, 2, and 5B	Construct balance of 4-lar arterial road section from Watt Avenue to Base Line Road with curb and gutter both sides of street, sidew on west side of street only and median landscaping.	e on	Small-Lot Final Map(s) creating 800 <sup>th</sup> lot within Properties IA, 1B, 2, 5A and 5B
16 <sup>TH</sup> Street – West Dyer Lane to Base Line Road	15		Construct westerly half of lane arterial road section (lanes) with curb and gutte on west side of street and median landscaping.	(2	Small-Lot Final Map or Building Permit for portion of Property 15 east of 17 <sup>th</sup> Street
16 <sup>TH</sup> Street – from West Dyer Lane to Sacramento County	9 an	d 16	Construct 4-lane arterial road section with curb ar gutter on both sides of street, sidewalk on west side of street only, and median landscaping.	nd	<ul> <li>9: First Small-Lot Final Map within Portion of Property 9 west of Property 11</li> <li>6: First Small-Lot Final Map east of Powerlines</li> </ul>
Palladay Road -Within Property	17		Construct easterly half section of 4 lane arterial road section (2 lanes) wi curb, gutter and sidewalk on east side of street alor Property 17.	ζ.	First Small-Lot Map
Palladay Road - from West Dyer Lane to Sacramento County	16		Construct easterly half section of 4 lane arterial road section (2 lanes) wi curb, gutter and sidewalk on east side of street.		First Street Connection to Palladay Road
Watt Avenue - Baseline Road to Sacramento County Line		, 5A, 5C, 6, ad 8	Widen half section to thr lanes, along frontage of adjacent Property	ee	Development Permit or Small-Lot Final Map for Adjacent Property
Road Segment / Location			Improvement		Commencement of Construction
Sanitary Sewer Improveme	nts				
East Dyer Lane - Base Line Road to Watt Avenue		Construct gravity trunk sewer system (w/ pipe sizes from 8" to 18") and appurtenances.			ncurrent with East Dyer ne road construction
Outside Road Right-Of-Wa Between East Dyer Lane ar Lift Station on adjoining project south of Dry Creek (Riolo Vineyards - propose	id	sewer p	nct 18" gravity trunk bipe and appurtenances, ng bore and jack g beneath Dry Creek.	Concurrent with East Dyer Lane road construction, unless solely permit-driven	

B. PROJECT-SPECIFIC INFRASTE	HICTHRE	
Road Segment / Location	Improvement	Commencement of Construction
Outside Road Right-of-Way - On adjoining project south of Dry Creek (Riolo Vineyards - proposed)	Construct 1.62 MGD sanitary sewer lift station, appurtenances, including emergency storage facility.	Concurrent with East Dyer Lane road construction, unless solely permit-driven
Outside Road Right-of-Way - Adjacent to southerly side of Dry Creek - Between Lift Station and connection point east of Walerga Road	Construct 12" sanitary sewer force main and appurtenances, including connection to existing force main stub located east of Walerga Road, south of Dry Creek.	Concurrent with East Dyer Lane road construction, unless solely permit-driven
Water Improvements		
East Dyer Lane – Watt Avenue to Base Line Road	Construct 12" water pipeline with service stubs and appurtenances.	Concurrent with East Dyer Lane road construction
Drainage Improvements		
East Dyer Lane – Watt Avenue to Base Line Road	Construct gravity trunk storm drain collection system (w/ pipe sizes from 18" to 54") including drop inlets, manholes, cross culverts, inlet structures, outlet structures, water quality facilities, and appurtenances.	Concurrent with East Dyer Lane road construction
Dry Utility Improvements		
East Dyer Lane – Watt Avenue to Base Line Road	Construct underground dry utility system including conduit, piping, substructures, and appurtenances for electric, telephone, gas, cable television, and streetlight systems, including removal and relocation of existing facilities.	Concurrent with East Dyer Lane road construction
C. AS-WARRANTED INFRASTRU	CTURE	
Road Segment / Location	Improvement	Commencement of Construction
Road / Traffic Signal Improvement	ents	
Base Line Road / 9 <sup>TH</sup> Street Intersection	Construct traffic signal	As needed based on signal warrants
Base Line Road / East Dyer Lane Intersection	Construct traffic signal	As needed based on signal warrants
Base Line Road / 11 <sup>TH</sup> Street Intersection	Construct traffic signal	As needed based on signal warrants
Base Line Road / 12 <sup>TH</sup> Street Intersection	Construct traffic signal	As needed based on signal warrants
Base Line Road / 14 <sup>TH</sup> Street Intersection	Construct traffic signal	As needed based on signal warrants
Base Line Road / Palladay Road Intersection	Construct traffic signal	As needed based on signal warrants

Road Segment / Location	Improvement	Commencement of	
<b>G</b>	·	Construction	
Walerga Road / West Town	Construct traffic signal	As needed based on signal	
Center Drive Intersection		warrants	
East Dyer Lane / A Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
East Dyer Lane / West Town	Construct traffic signal	As needed based on signal	
Center Drive Intersection		warrants	
Watt Avenue / A Street	Construct traffic signal	As needed based 'on signal	
Intersection		warrants	
Watt Avenue / West Town	Construct traffic signal	As needed based on signal	
Center Drive Intersection		warrants	
Watt Avenue / Oak Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
West Dyer Lane / A Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
West Dyer Lane / East Town	Construct traffic signal	As needed based on signal	
Center Drive		warrants	
West Dyer Lane / 18 <sup>TH</sup> Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
West Dyer Lane / Palladay	Construct traffic signal	As needed based on signal	
Road Intersection		warrants	
West Dyer Lane / 16 <sup>TH</sup> Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
West Dyer Lane / Tanwood	Construct traffic signal	As needed based on signal	
Avenue Intersection		warrants	
West Dyer Lane / 11 ' Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
Palladay Road / A Street	Construct traffic signal	As needed based on signal	
Intersection'		warrants	
16 <sup>Th</sup> Street / A Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
14 <sup>TH</sup> Street / A Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
12 <sup>TH</sup> Street / A Street	Construct traffic signal	As needed based on signal	
Intersection		warrants	
Sanitary Sewer Improvements			
N/A	N/A	N/A	
Water Improvements	·	- · · -	
2 Locations –	Construct 3.0 MG water storage	As required by PCWA	
A) Adjacent to west side of East	tank and backup drought		
Dyer Lane 1800 feet south of A	reliability system.		
Street,			
B) Adjacent to west side of			
Palladay Road 1800 feet south			
of A Street			

C. AS-WARRANTED INFRASTRUCTURE			
Improvement	Commencement of Construction		
Drainage Improvements			
N/A	N/A		
Dry Utility Improvements			
N/A	N/A		
	Improvement  N/A		

#### Notes:

- All utility pipe, storage tank, and lift station sizes are based on preliminary conceptual designs and are subject to change during final design and public agency approval process.
- Number of building permits shall exclude permits for model homes.

Source: Placer Vineyards Specific Plan Development Agreement, November 2007

The Thresholds of Significance established for the Revised Draft EIR generally state that a significant impact would occur if development resulted in an increase in demand that would not be met by existing water service, storm water drainage systems, sewage systems, or would require the construction of new systems not anticipated by the project. In addition, a significant impact would result if project generated traffic led to a Service Level of "D" on area road ways.

Although a permanent decrease in available water would require the curtailment of development, no building permits would have been issued without at least the Core Backbone Infrastructure being in place. Therefore, any existing development constructed or under construction at the time of the curtailment would have adequate infrastructure and service. In fact given the requirements of the DA that trigger the construction of the Remaining Backbone at issuance of the 7000<sup>th</sup> permit, it is possible that if the long term water curtailment scenario occurred soon after this trigger point, the Specific Plan area could be infrastructure "rich" with greater capacity than the level of development permitted under curtailment. Based on the above, the impacts of long term development curtailment on the infrastructure of the Specific Plan area would be *less than significant*.

Since the capacity of the regional infrastructure and the level of proposed development at some future time are unknown, the potential impacts to regional infrastructure are speculative. Since it is possible that projects may have been approved and are in the construction phase prior to the completion of the associated infrastructure (especially in the instance of development of roadway/traffic improvements) there are *potentially significant impacts* to the region's infrastructure that would result from the long-term curtailment of development resulting from a curtailed water supply.

**Pattern of Development.** As discussed above, the Specific Plan area is under multiple ownerships so the timing of the development of a specific property is not according to a phasing plan, but according to the market-driven and personal criteria that each owner has as to when is the right time to develop. While the infrastructure of the Specific Plan area will be in place there is no assurance that build out of the plan area will occur in a contiguous manner. The following are examples of the types of impacts the resulting permanent checkerboard pattern of development could have if development were curtailed;

- Interference with the continued use or return of abutting undeveloped parcel(s) to their previous land use (e.g., agriculture) as a result of surrounding development. Unused land proximate to or surrounded by development could become an attractive nuisance, including a fire hazard.
- While less biological habitat would be converted, the likely checkerboard pattern of
  development would lead to the creation of biological resource islands. As development
  occurs, developers would be required to mitigate their fair share of project impacts.
  However, partial development would result in only partial payments into mitigation banks or
  the setting aside and restoration of only portions of proposed mitigation lands.
- Potential isolation of individual homes surrounded by large areas of open space. Single or small clusters of home development with the street system in place but large vacant tracts between the homes and major streets could lead to a variety of land use incompatibilities and service delivery issues, including those related to policing and fire protection.
- While street lights could be in place, the lighting of empty lots is unlikely to occur unless individual standards or groups of standards could be selectively lit. Even if selectively lit, areas that have improved lighting surrounded by unlit areas would create aesthetic or visual impacts.
- As required by the DA, there would be an established street system. Depending of the actual amount of "unused" roads, it is possible that these roadways would attract illegal activities such as street racing. In addition, unused pavement would deteriorate over time.
- Depending on the amount of development that had occurred at the time of permanent curtailment the enrollment at a given school may result in the closure of that school and the shifting of students to other schools, necessitating the development of alternative school transportation that was not anticipated by the school district.

Similar patterns of development with similar consequences could occur in other western Placer County projects relying on the same water source. These and other similar effects of permanent curtailment are *potentially significant impacts*.

**Economic Considerations.** The long-term curtailment of water leading to the curtailment of development of the Specific Plan area would part of a region wide curtailment in development, since reduction in the permanent water supply would not occur on a project-by-project basis. The reduction in the availability of water could result in a region wide downturn in economic conditions. Lowered economic growth could have substantial impacts to local jurisdictions in the provision of services (e.g., reduced funding for police and fire protection services) and maintenance of existing service infrastructure (e.g., roads, transportation, water, stormwater and sewage). The curtailment of water supply could serve as a catalyst for a revision in regional population projections, with population growth shifting to areas with better water supplies, if such areas were to exist. (Notably, Placer County, with PCWA as its primary water supplier, appears to be much better positioned for the future than most other urbanizing areas in California, many of which rely on imported water supplies particularly susceptible to reductions due to environmental considerations such as the need to reduce exports from the Sacramento-San

Joaquin Delta in order to maintain Delta water quality standards and avoid undue harm to listed aquatic species.)

While a reduced population and the curtailment in development would lessen the pressure for the potential conversion of farmland and wildlife habitat, constraints placed on development by the reduced level of available water could also place constraints on continued irrigated agricultural practices in the region. It would be speculative, however, to try to predict the level of impact that would occur as the remaining urban and agricultural interests vie for the available water supplies. In general, though, urban water users can typically afford to pay more for water than agricultural users, with the likely result that over time urban users will out-bid and out-compete agricultural users for limited supplies. This trend is already occurring throughout the Central Valley. Likewise wildlife habitat would not be subject to development pressures; however, there would be pressure to divert water currently used to maintain biological resources to supply the region's population. Even so, compared with the owners of agricultural lands, the entities managing habitat lands, and especially those preserving habitat for special status species, might enjoy comparatively more legal protections that might allow them to compete on more favorable terms with urban uses than agricultural users are able to do.

Absent more concrete cause and effect, the economic effects described above are not treated as significant effects on the environment, consistent with CEQA Guidelines Section 15131. Any possible environmental effects that could result from economic effects are too speculative and attenuated to form the basis for concrete impact characterizations and mitigation measures.

# Mitigation Measure

Impacts resulting from permanent water supply curtailment are potentially significant on regional infrastructure, and on patterns of development within the Placer Vineyards Specific Plan and regionally. No mitigation measures are known to the County that would mitigate for the effects of a permanent curtailment of water supply in an unknown amount at an unknown time. The identified impacts, therefore, remain *potentially significant and unavoidable*.

# Analysis of the Effects of Mitigation Measures 4.II.7-la and 4.II.7-lc

To address a potential shortfall in the initial water supplies, the Revised Draft EIR proposed Mitigation Measures 4.11.7-1a and 4.11.7-1c that would temporarily curtail development until the long-term supply or another source of potable water became available. In the *Vineyard* decision, the California Supreme Court found that the environmental effects of curtailing development, which may result in a partially built-out project, must also be analyzed. Although the Court does not reference CEQA Guidelines Section 15126.4, subdivision (a)(1)(D), because this is a mitigation measure, the required analysis should be undertaken consistent with this provision (i.e., "If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed").

With regard to the initial surface water supplies, the Section 4.11.7 of the Revised Draft EIR finds as follows (page 4.11-81):

Unless and until infrastructure for the long-term water supply is completed and implemented, continued development of the Specific Plan area could generate demand for water that exceeds the supply provided by the initial water supply. Should this occur, the Specific Plan has also identified secondary water supply plans that would deliver an additional 6,000 AFA to the Specific Plan area, including: (1) an extension of the existing San Juan Cooperative Pipeline and Northridge Transmission Pipeline (Cooperative Transmission Pipeline) that terminates at Antelope and Walerga Road, west along Antelope Road and north to Watt Avenue into the Specific Plan area; and (2) a pipeline within PFE Road from Cook Riolo Road to Watt Avenue extending north to the Specific Plan area could also be used to convey this supply. Because a number of actions must occur in order to secure these water supplies, including multi-party agreements, treatment plant improvements, and the extension of an existing pipeline to the Specific Plan area, this impact is considered *potentially significant*.

It is important to note that any effects of the curtailment are likely to be temporary and would be ameliorated upon receipt of the long-term or buildout water supply, which is promising, if not certain, for reasons discussed earlier. In many respects, this is not dissimilar to what commonly occurs in the land development and construction business as a result of the cyclical nature of housing demand. Projects are often partially built out and awaiting additional market-driven housing demand before they can be completed.

Table 4.3.5-1 provides an assumed development buildout for the project thorough 2025. The initial surface water supply is projected to be available through 2012, at which time it would be fully utilized. In 2012 it is projected that the Placer Vineyards Specific Plan area would contain approximately 2,700 completed dwelling units and/or dwelling units under construction. The water supply analysis assumes that the secondary initial water supply could be extended to the Specific Plan area by 2012, and would allow development to continue unabated until approximately 2020, by which time the long-term or buildout water supply from the Sacramento River would likely be available. By 2020, approximately 6,500 dwelling units are projected for Placer Vineyards.

Because Mitigation Measures 4.11.7-1a and 4.11.7-1c could be used to temporarily curtail development during the period of time that the project would be dependent on the initial water supplies, the following analysis is provided of the potential effects of a curtailment. Although the curtailment would be most probable after the construction of the first 2,700 dwelling units, the analysis assumes curtailment could occur at any time.

Land Use and Planning Policies. Land use as approved by the County under the Specific Plan would not be altered by the temporary curtailment of development. Buildout would be slowed, but the ultimate buildout pattern would, in all likelihood, eventually be achieved. The potential for internal conflicts between pre-development land uses and those built under the Specific Plan could increase, due to the greater period of time required for buildout. In other words, pre-development land uses such as cultivation of crops and the raising of livestock could remain in place for longer periods of time, causing temporary conflicts with land uses developed under the

Specific Plan. On the other hand, agricultural land would remain in production for a longer period, delaying the significant and unavoidable removal of such land. Any identified conflicts with planning policies, as discussed in Section 4.1 of the Revised Draft EIR, would not generally be altered by the curtailment; however, a curtailment may pose a temporary barrier to balancing the mix of land uses within the Specific Plan area, as discussed under Revised Draft EIR Impact 4.1-1, due to the fact that employment uses and retail services typically follow residential development.

**Visual Quality and Aesthetics.** If development were to be temporarily curtailed, some of the effects related to visual character, light, and glare would be delayed and areas of existing open space would remain for a greater period of time. Because the project description permits development anywhere within the Specific Plan area and provides backbone infrastructure to service discontiguous development, the visual and light producing characteristics of the area would be unevenly distributed across the Specific Plan area. However, the same type of discontinuity and unevenness would occur temporarily were the project to build out under the Specific Plan without the temporary curtailment.

**Hydrology, Water Resources and Water Quality.** The proposed Development Agreement and project description for the Placer Vineyards Specific Plan require Core Backbone Infrastructure to be substantially complete prior to issuance of the first building permit. The Core Backbone Infrastructure will include primary roadways and appurtenant drainage structures. In addition, the Development Agreement (DA) requires that for each portion of the property then proposed for development, the developer shall design and construct all downstream permanent drainage facilities to provide drainage of the developing portion of the property. The Development Agreement also requires construction of all other drainage facilities necessary to serve the developing property prior to recordation of any small lot Final Subdivision Map (DA Section 3.12). As a result, if development were to be temporarily curtailed, there would be no consequent shortfall in adequate drainage facilities to serve the development and no impact.

If development were curtailed, some immediate effects of development on water quality could be delayed. Because various mitigation measures dealing with water quality effects during construction and occupancy are implemented with each Final Subdivision Map and building permit, curtailment would have no impact on implementation of these measures and would cause no new impacts.

**Biological Resources.** Temporary curtailment would delay some direct effects on biological resources, including open space. However, because off-site mitigation sites would be acquired and expanded as development occurred, less acreage would be preserved and preserve areas could be temporarily limited in size. Although project mitigation (Mitigation Measure 4.4-1a) requires that Open Space Mitigation and Management Plans be prepared for each specific property to be preserved, temporary curtailment could result in Management Plans that cannot be fully implemented (creation of large contiguous areas) until additional development occurs. Delays also cause the costs of preservation to increase and may result in the loss of some sites that would otherwise be available for purchase. On the other hand, curtailment would mean that there is less development creating the need for biological mitigation.

**Geology and Soils.** Temporary curtailment would have little effect on geology and soils. Impacts related to geology and soils occur as a result of individual construction projects. Without continued development, there would be no impact except in the case of potential soil erosion caused by prior development activities. However, such effects would be fully mitigated at the point of initial development through NPDES and Revised Draft EIR Mitigation Measures 4.5-1a through 4.5-4f.

**Archaeological/Paleontological Resources.** Temporary curtailment would delay some effects on cultural resources and would have no potential to increase impacts. Mitigation Measures contained in the Revised Draft EIR (Section 4.6) are operative when specific ground-disturbing activities occur and would remain effective under a temporary curtailment scenario.

**Transportation and Circulation.** As is noted above, the proposed DA and project description for the Placer Vineyards Specific Plan require Core Backbone Infrastructure to be substantially complete prior to issuance of the first building permit. The Core Backbone Infrastructure will include primary roadways. The DA also provides that secondary road improvements shall be completed when required by the timing set forth in the DA's Road Improvement Table or an improvement agreement acceptable to the County. It is anticipated that the Long-Term or Buildout Surface Water Supply would be available by approximately 2016, at which time temporary curtailments would no longer be necessary. It is projected that the Placer Vineyards Specific Plan area would contain approximately 4,000 dwelling units by 2016. The various road improvements described in the DA's Road Improvement Table are not required until commencement of construction of the 7,000<sup>th</sup> building permit or the 10,000<sup>th</sup> building permit. Therefore, a temporary curtailment would have no effect on the timing or construction of these improvements. Other improvements are tied to a specific future Small-Lot Final Map; however, those roadway improvements are needed only if the particular project proceeds. If the project were curtailed, the improvement would not be required unless the project later proceeded.

There are a number of off-site roadway improvements for which the project proponents would pay a fee. If the project were temporarily curtailed, those fees would not be paid until a water supply became available (approximately 2016). By the same measure, the project also would not generate traffic warranting the payment of the fee and, presumably, the improvement. It is recognized that a perfect match will not always exist between fees collected and the timing of roadway improvements, and that market conditions often similarly curtail projects and the payment of fees that might otherwise be expected. Thus, in some instances there may be insufficient fees (from Placer Vineyards and other projects competing for limited water supplies) to pay for needed improvements; in other instances, there may not be sufficient need for improvements for which some fees have been collected but not spent.

Although the traffic projections assume that there would be trips attracted internally by employment and retail centers that would otherwise leave the project area, thus increasing external congestion, such internal trip attractants are a more significant consideration under buildout of the project when roadways are fully loaded and employment and retail attractants actually exist. Such uses typically follow later in the buildout process, after "rooftops" have reached critical mass. Thus, it is possible that curtailment would cause Placer Vineyards residents to have to leave the project area in their vehicles for jobs and retail opportunities that

would be available on-site under a scenario without curtailment. Any such external effects, however, are not expected to be incrementally considerable or significant in and of themselves. Thus, a temporary curtailment is unlikely to significantly increase traffic congestion based on the number of dwelling units expected prior to 2016.

Air Quality. Emissions are tied to the amount of development occurring and trips generated during and following construction. Therefore, temporary curtailment would also curtail related emissions temporarily. This reduction could be offset by longer trips. As discussed above, retail and employment uses typically follow later in the buildout process, after "rooftops" have reached critical mass. Thus, it is possible that curtailment would cause Placer Vineyards residents to have to leave the project area in their pollutant-emitting vehicles for jobs and retail opportunities that would be available on-site under a scenario without curtailment. Any air pollution increases from such external effects, however, are not expected to be incrementally considerable or significant in and of themselves, especially given that, as the Revised Draft EIR already explains, air quality effects from the Project are significant and unavoidable. Thus, a temporary curtailment is unlikely to substantially increase the already significant air emissions from the Project based on the number of dwelling units expected prior to 2016.

**Noise.** Noise affecting the Specific Plan area and surrounding uses is generated by three sources: aircraft, construction and traffic. Temporary curtailment would reduce noise generated by construction and traffic. No adverse effects from curtailment have been identified. Aircraft noise would continue to have a less than significant effect on the constructed portions of the project.

**Population, Employment and Housing.** Any temporary curtailment in Specific Plan area population growth would almost certainly be accommodated elsewhere in the region within projects with an adequate water supply. Any indirect effects attributable to population growth, including air quality, traffic and public services impacts, would be shifted to areas in which growth was occurring.

Although affordable housing issues typically fall outside the scope of CEQA analysis, it should be noted that development of affordable housing would be curtailed in the project area along with market rate housing. The project proponents propose to construct 1,413 affordable housing units (or 10% of the project's housing), consistent with the County's General Plan. The Specific Plan focuses affordable housing in high density and mixed use designations. Because buildout of these land use designation areas is likely to follow partial buildout of lower density areas, a temporary curtailment during early stages of the project should have little effect.

The Revised Draft EIR reports that there will be short term imbalance of jobs and housing (more housing than jobs) that will correct itself over time. Because a temporary curtailment would slow or stop the construction of housing during the period when there would be more job seekers than jobs, the effect would actually be beneficial on a regional basis. Locally, since all construction within the project area would stop, there would be no effect.

**Public Services/Infrastructure.** Fire: Based on triggers outlined in the DA, a temporary curtailment could curtail construction of the permanent eastern fire station that is to be complete

by the time the 5,000<sup>th</sup> building permit is issued. However, an interim eastern station is required in the second year of development. At this time there would be fewer than 1,700 houses built or under construction (Table 4.3.5-1). Because the initial surface water supply is probable and would provide sufficient water for at least 2,700 homes, the interim station would be in place and available to serve any development with in its service area, if temporary curtailment did occur prior to the 5,000 building permit. After the 5,000<sup>th</sup> building permit is issued, all fire stations would be in place and curtailment would have no direct effect on adequacy of fire response. Also, with the 5,001<sup>st</sup> building permit the developers are required by the DA to pay a Regional Fire Facility Fee for development of a regional fire safety facility. This payment would be delayed if there was a temporary curtailment.

<u>Police</u>: Similar to fire, the DA provides for an interim facility prior to the first building permit. A permanent facility is required prior to the 3,200<sup>th</sup> building permit. Although not likely, because curtailment could occur at the 2,700<sup>th</sup> building permit, operations could be required to use the interim facility for a longer period of time than originally anticipated. Revised Draft EIR Mitigation Measure 4.11.3-2b requires an agreement for staffing and equipment prior to the recordation of the first final subdivision map, which precedes issuance of building permits.

<u>Schools:</u> Procedures are provided in the Education Code to protect the interests of affected school districts; however, temporary curtailment of the project could lead to delays in the construction of schools within the project area and could cause additional busing and use of temporary facilities on the part of school districts until development reached the necessary trigger for school development. However, the DA provides that the developers will make at least two improved elementary school sites and one improved middle school site available to the school districts prior to issuance of any building permits. In any event, State law provides that the payment of school impact fees by new development is sufficient, as a matter of law, to mitigate all impacts related to school facilities to a less than significant level (Gov. Code § 65996).

<u>Solid Waste Disposal:</u> Temporary curtailment would have no effect on solid waste disposal. Use of disposal facilities would be reduced during the temporary curtailment, but would resume upon development of the long-term water supply.

<u>Wastewater</u>: Backbone infrastructure for wastewater collection and disposal is required to be constructed upon project initiation. Revised Draft EIR Mitigation Measure 4.11.6-2a requires treatment commitments prior to improvement plan approval. In-tract improvements would be required prior to the issuance of any affected building permits. Temporary curtailment would have no effect on the adequacy or provision of sewer service to completed construction or homes for which building permits have been issued.

<u>Recycled Water:</u> Recycled water requires that wastewater be generated. Temporary curtailment would temporarily reduce future generation of wastewater and recycled water; however, the amount being generated at the point of curtailment would continue to be generated and used as before. Any expansion of public landscape areas would be curtailed until additional recycled water became available.

<u>Library Services:</u> The DA provides that a permanent library be constructed prior to the 3000<sup>th</sup> building permit. Until that time library services would be provided by bookmobile. If curtailment occurred prior to the 3,000<sup>th</sup> building permit (e.g., at the 2,700<sup>th</sup> building permit), library services would continue to be provided by bookmobile until the curtailment was lifted. An interim library facilities fee is required to be paid prior to the issuance of the first building permit within the project area. Payment of this fee would be unaffected by a temporary curtailment in water supply.

Parks and Recreation: Parks and recreation facility development is required in a phased manner by the Revised Draft EIR and DA. Localized facilities have triggers tied to as few as 100 and 200 building permits, while some community facilities are not to be constructed until the latter stages of development. A temporary curtailment would delay the construction of certain community facilities; however, because local facilities are tied to a very low threshold, development of such facilities would be little affected by a temporary curtailment. Mitigation Measure 4.11.13-3 requires that funding mechanisms for park maintenance and recreation programs be in place prior to recordation of the first small-lot final map and would, therefore, be unaffected by any curtailment.

General County Facilities and Services: Mitigation Measure 4.11.14-3 requires that a phased schedule be prepared for the provision of general government facilities. The schedule is reflected in the DA, which provides for various facilities to be available at different times. Some facilities such as the Interim Government Center are to be available prior to issuance of the first building permit. A limited number of facilities are to be available during the period of time when the project would rely on the initial water supplies. These primarily include facilities related to start-up of transit service. If a temporary curtailment were to occur, transit service would also likely be curtailed, which could lead to increased use of automobiles, with attendant traffic, air quality and noise implications. However, because such curtailment would occur early in the development process, any temporary increase in impacts would be well within the buildout analyses provided in the Revised Draft EIR.

**Hazards.** A temporary curtailment would have little environmental effect. Hazards abatement typically occurs as property is developed consistent with the various mitigation measures contained in Revised Draft EIR Section 4.12. Any curtailment would simply lengthen the time in which full abatement would occur. There is a potential for dwellings to be constructed adjacent to properties on which abatement has not been completed due to curtailment, thus increasing the potential for exposure of residents to unhealthy conditions; however, this same potential would exist under a market-driven buildout and would be monitored by the County's Environmental Health Division under either circumstance.