

**3.0**  
**COMMENTS AND RESPONSES**



### 3.0 COMMENTS AND RESPONSES

This chapter includes all comments received on the Draft Tier 1 EIS/EIR (Section 3.2) and the PRD (Section 3.3). The comments are annotated with letter and comment numbers. Comments received at all four of the public hearings are also included. Comments are categorized and numbered sequentially, as listed in the Table of Contents. Responses to the identified comments are included opposite each comment. Responses generally provide clarifications to the Draft Tier 1 EIS/EIR and/or the PRD, and occasionally include changes or additions to the text of these documents. Additions are shown as underlined and deletions are shown as ~~strike-through~~.

*This page intentionally blank.*

## 3.1 MASTER RESPONSES

### 3.1.1 Master Response 1

A number of commenters raised questions about the no-development buffer zone proposed as part of the Parkway project. This response provides an overview of the purpose and design of the buffer.

As proposed, Placer Parkway includes protection of a corridor that is wider than needed for the proposed roadway, with lands on one or both sides of the facility called “no-development buffer zones.” This is described in Sections 2.2.4 and 2.2.5 in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR.

The no-development buffer is not intended to provide mitigation for adverse environmental impacts from the project. The buffer would, however, reduce or avoid some potential effects, particularly effects related to growth.

The purposes of the no-development buffer are to:

- Further a “parkway” concept by maintaining a visual open space element and encouraging linkages to other open spaces along the corridor, preserving open space, biological resources, and agricultural uses adjacent to the Parkway.
- Limit future development along the Parkway from encroaching to the facility’s edge by maintaining a zone where development is either not permitted or severely restricted.
- Limit access to the Parkway by precluding interchanges in the Central Segment, which would help to preserve the Parkway as a high-speed facility.
- Limit potential growth inducement that might otherwise result from provision of access in areas not planned for growth.

As described on page 2-9 of the Draft Tier 1 EIS/EIR, “... it may be appropriate to adjust the final size and shape of the buffer based on Tier 2 analysis of the Parkway. It is anticipated that such adjustments are most likely to occur in parts of the Parkway near agriculturally designated land undergoing urban development. This determination would be based on performance standards on a case-by-case basis, depending on the land use needs of future approved development, and taking into account the primary objective of restricting future access to the Parkway.”

Section 2.2.4.2 of the Draft Tier 1 EIS/EIR describes a number of mechanisms that may be used to govern activity within the no-development buffer. These include land use controls, laws, policies, and regulations, and real property interests, including Fee Simple (Fee Title) Land, Undivided Interest, Conservation Easements, Transfer (Purchase) of Development Rights, Leases, Land Repackaging, and Options/First Rights of Refusal. Appendix A of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR provide additional details of specific provisions regarding easement language.

The Draft Tier 1 EIS/EIR analysis assumed five to six interchanges in the Parkway's Western and Eastern segments, where existing areas of dense development are already located or planned. As explained previously, access was to be restricted for the 7-mile portion of the alignment between Pleasant Grove Road and Fiddymment Road (please see Figure 2-1 in the Draft Tier 1 EIS/EIR); the Draft Tier 1 EIS/EIR analysis assumed no interchanges in this segment. The assumptions regarding interchanges, like other assumptions regarding future land uses, were made based on adopted city and county plans and related planning processes. The locations of conceptual interchanges, which the Draft Tier 1 EIS/EIR acknowledges may be subject to change as the Parkway design is refined at Tier 2 (see Section 2.2 of the Draft Tier 1 EIS/EIR), were identified by the project's Technical Advisory Committee as the most appropriate locations compatible with the local roadway network, and future planned and proposed development, and were based on Caltrans design requirements for a free-flowing, high-speed limited access facility.

The exclusion of interchanges between Pleasant Grove Road and Fiddymment Road and the no-development buffer zone were part of the project description in the Draft Tier 1 EIS/EIR, based on project goals and policies established by earlier planning documents. Any future interchanges and/or no-development buffer zone modifications are not part of the project and would require later, independent environmental review.

In response to comments regarding the no-development buffer, and in the context of discussions with the U.S. Environmental Protection Agency (U.S. EPA) and the U.S. Army Corps of Engineers (USCOE) relating to the Least Environmentally Damaging Practicable Alternative, additional analysis was conducted to consider how the comparison of alternatives would be affected by allowing additional development in the buffer area and hypothetical interchanges.

Any planning and forecasting effort involves some level of uncertainty. Although the Federal Highway Administration (FHWA) and the South Placer Regional Transportation Authority (SPRTA) do not believe that the aspects of the Parkway project related to the no-development buffer and the restriction of interchanges between Pleasant Grove and Fiddymment roads involve a greater degree of uncertainty than growth forecasts or other aspects of this or similar projects, they do acknowledge that FHWA, California Department of Transportation (Caltrans), and SPRTA cannot guarantee that, in the future, the proposed no-development buffer zones would not be reduced or that additional interchanges would not be constructed. FHWA cannot legally preclude the right of local jurisdictions to make future land use decisions in the vicinity of or along the Placer Parkway. SPRTA does not have land use authority, although it would have some influence over land acquired for the Parkway and for the no-development buffer zones. Currently, no absolute mechanism is in place that could guarantee that there would be no new interchanges between Pleasant Grove Road and Fiddymment Road or to maintain a no-development buffer zone width in the varying 500- to 1,000-foot-wide corridor. Nevertheless, it is the intent to work with jurisdictions having land use authority to implement a buffer, consistent with the intent described above and subject to adjustments where land is undergoing urban development.

In order to address these areas of uncertainty, additional analysis was undertaken that included hypothetical no-development buffer zone reductions and hypothetical interchanges that are not proposed by FHWA, Caltrans, or SPRTA, for the purpose of determining whether such actions

would result in a substantively different understanding of the Parkway alternatives. These studies are included in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD) which was circulated for public comment on January 30, 2009.

The additional studies evaluated the following issues:

- **Analysis of Growth-Inducing Effects.** This evaluation uses a hypothetical scenario in which the Parkway does not have a no-development buffer zone, and in which three to four additional interchanges are included. The analysis evaluates the amount of Potentially Developable Land near each Parkway corridor alignment alternative and around each interchange. The intent of this approach was to identify how the Parkway corridor alignment alternatives differ in the area of adjacent Potentially Developable Land, and how these differences could potentially influence project-induced growth.
- **Traffic Analysis.** This analysis was performed to determine whether the additional hypothetical interchanges would degrade Parkway traffic flow or cause an alternative to fail to achieve the project Purpose and Need.
- **Analysis of Growth Effects on Biological Resources.** This evaluation uses the evaluation of Potentially Developable Land near the alignments from the growth-inducing analysis. This analysis was performed to identify what biological resources might be affected by development of the land near the Parkway corridor alignment alternatives and whether development in these areas would result in habitat fragmentation.
- **Cumulative Impacts Analysis.** This evaluation includes a more detailed investigation of cumulative impacts. The analysis identified how the Parkway corridor alignment alternatives differ in potential cumulative impacts on wetlands and vernal pool complexes. It should be stressed that no-development buffer zone reductions and/or additional interchanges have not been and are not being proposed by FHWA or SPRTA as part of the Tier 1 process, and with the exception of a potential interchange with an extension of Watt Avenue, the need for additional interchanges has not been identified by any jurisdiction.

The analysis did not result in substantive changes in the analyses presented in the Draft Tier 1 EIS/EIR, and generally supported that document's explanation that there is little difference in the growth inducement potential of the Parkway alternatives. This analysis determined that the more northerly corridor alignment alternatives would result in less growth inducement potential and less secondary and indirect impacts on biological resources than would more southerly corridor alignment alternatives.

As a result of updates to Geographical Information System (GIS) data provided by Placer County subsequent to the circulation of the PRD, adjustments were made to the analysis within the PRD to ensure calculations reflected the most current GIS data. The updated shape files provided by Placer County included two boundary areas that differed from those used in the Draft Tier 1 EIS/EIR and the PRD. These differences primarily comprised a revision to the boundary of the

Curry Creek Specific Plan area, increasing the area of land included within the plan to the west and north and an addition of a parcel of land on the western boundary of Regional University. Consequently, information relying on this data in the PRD was revised and is included in Chapter 4 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

The primary difference resulting from these updates is in the amount of potentially developable land in Alternative 1, which with these changes would be 17 acres less than Alternative 5. This difference represents less than 0.065 percent of the total area of the Alternative 5 corridor alignment analysis area. The update also resulted in minor modifications to the cumulative analysis to ensure that calculations that included Curry Creek Specific Plan were accurate, but did not result in changes to the conclusions.

Please also see Chapter 2 and Appendix A regarding specific provisions regarding easement language focused on reducing the potential for growth inducement, as agreed to by the U.S. EPA as part of the modified National Environmental Policy Act (NEPA)/404 Concurrence Point 4.

### **3.1.2 Master Response 2**

A number of commenters raised questions regarding transit. This response provides general information regarding Placer County Transportation Planning Agency (PCTPA) transit planning activities. PCTPA works with the following public transit providers serving Placer County for short- and long-range transit planning:

- Auburn Transit
- Western Placer (Consolidated Transportation Service Agency (CTSA))
- Lincoln Transit
- Placer County Transit
- Roseville Transit
- Tahoe Area Regional Transit

Recent examples of PCTPA's public transit planning include:

- South Placer County Bus Rapid Transit (BRT) Service Plan (2008). This plan is the third phase in the development of a high-capacity, regional transit connection for the cities and unincorporated areas in south Placer County, which has been undergoing rapid growth in recent years.
- Transit Master Plan for Placer County (2007). This plan examines all aspects of transit service delivery to prepare a consistent, coordinated vision for Placer County transit operators. It is the policy blueprint to guide planning for future transit service delivery. As a part of this effort, PCTPA is developing a transit consolidation implementation strategy to integrate and make operations more efficient among local providers.