



# **FINAL**

## **Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/ Program Environmental Impact Report Final Tier 1 Section 4(f) Evaluation**

**November 2009**



**Prepared by  
URS Corporation**



**for  
South Placer Regional Transportation Authority  
California Department of Transportation  
Federal Highway Administration**



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PLACER PARKWAY CORRIDOR PRESERVATION  
IN THE COUNTIES OF SUTTER AND PLACER, STATE OF CALIFORNIA  
FROM STATE ROUTE 70/99 TO STATE ROUTE 65

FINAL TIER 1 ENVIRONMENTAL IMPACT STATEMENT/  
PROGRAM ENVIRONMENTAL IMPACT REPORT  
FINAL TIER 1 SECTION 4(f) EVALUATION

Submitted Pursuant to: (State) Division 13, Public Resources Code  
(Federal) 42 USC 4332(2)(c) 49 USC 303


U.S. DEPARTMENT OF TRANSPORTATION  
Federal Highway Administration, and

THE STATE OF CALIFORNIA  
Department of Transportation, and

SOUTH PLACER REGIONAL TRANSPORTATION AUTHORITY


11-5-09

Date of Approval

  
Executive Director  
South Placer Regional Transportation Authority


11-9-09

Date of Approval

  
Chief, Office of Environmental Services  
California Department of Transportation, North Region  
Responsible Agency CEQA/NEPA Technical Assistance to FHWA

11-9-09

Date of Approval

  
Division Administrator  
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Abstract

Abstract: The proposed action would select and preserve a corridor for the future construction of Placer Parkway—a new east-west roadway linking State Route (SR) 65 and SR 70/99. Potential benefits from future implementation include reduction of anticipated congestion on both the local and regional transportation system and advancement of economic development goals in southwestern Placer County and South Sutter County. Potential impacts from future implementation include effects to socioeconomic and community resources, farmlands, cultural resources, traffic and transportation, air quality, noise, hydrology, temporary construction impacts, and growth impacts.



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**APPENDICES**

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Appendix D Mitigation Monitoring and Reporting Program

Appendix E Final Tier 1 Section 4(f) Evaluation

**ATTACHMENTS (on CD)**

Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR

Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR

## ACRONYMS

AB	Assembly Bill
AFA	Analysis Focus Area
APE	Area of Potential Effects
BOPO	Blue Oaks Property Owners Group
BRT	Bus Rapid Transit
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHP	California Highway Patrol
CIA	Community Impact Assessment
CIP	Capital Improvement programs
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CSP	Creekview Specific Plan
CUPA	Certified Unified Program Agency
CVRWQCB	Central Valley Regional Water Quality Control Board
dBA	A-weighted decibels
DTA	Development Transition Area
DUE	development unit equivalent
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Mitigation Program
FR	Federal Register
FRAQMD	Feather River Air Quality Management District
GHG	greenhouse gases
GIS	Geographic Information System
HHW	Household Hazardous Waste
HHWCF	Household Hazardous Waste Collection Facility
HOV	High-Occupancy Vehicle
I-5	Interstate 5
I-80	Interstate 80
LAFCO	Local Agency Formation Commission
lbs/day	pounds per day
L <sub>dn</sub>	Day-Night Noise Level
LEA	Local Enforcement Agency
LEDPA	Least Environmentally Damaging Practicable Alternative
L <sub>eq</sub>	hourly equivalent noise level
LFG	landfill gas
LOS	level of service
µg/m <sup>3</sup>	micrograms per cubic meter
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
mph	miles per hour
MRF	Materials Recycling Facility
MRP	Monitoring and Reporting Program

MTP	Metropolitan Transportation Plan
NAHC	Native American Heritage Commission
NBHCP	Natomas Basin Habitat Conservation Plan
NEPA	National Environmental Policy Act
NO <sub>2</sub>	nitric oxides
NO <sub>x</sub>	oxides of nitrogen
NOA	Notice of Availability
NRCS	Natural Resources Conservation Service
O <sub>3</sub>	ozone
PA	Programmatic Agreement
PCAPCD	Placer County Air Pollution Control District
PCCP	Placer County Conservation Plan
PCTPA	Placer County Transportation Planning Agency
PDT	Project Development Team
PM <sub>10</sub>	particulate matter less than or equal to 10 microns in diameter
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PRD	Partially Revised Draft
PRSP	Placer Ranch Specific Plan
PSR	Project Study Report
PVSP	Placer Vineyards Specific Plan
REC	Recognized Environmental Condition
ROG	reactive organic gases
RUSP	Regional University Specific Plan
SAC	Study Advisory Committee
SACOG	Sacramento Area Council of Governments
SB	Senate Bill
SHPO	State Historic Preservation Office
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
SPRTA	South Placer Regional Transportation Authority
SPSP	Sutter Pointe Specific Plan
SR	State Route
TAC	Technical Advisory Committee
TASA	Traffic Analysis Study Area
TSM	Transportation Systems Management
U.S. EPA	U.S. Environmental Protection Agency
USCOE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VHD	Vehicle Hours of Delay
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	Waste Discharge order
WFFNA	West-Park–Fiddymont Farm Neighborhood Association
WPWMA	Western Placer Waste Management Authority
WRSL	Western Regional Sanitary Landfill

**Comments on the Draft Tier 1 EIS/EIR**

<b>Category</b>	<b>Comment Letter</b>	<b>Commenter</b>
<b>Business</b>	B-001	Megan M. Quinn of Remy, Thomas, Moose and Manley, LLP, on behalf of Placer Vineyards Development Group, LLC
	B-002	Jeffrey F. Bordelon of the Law Offices of Jeffrey F. Bordelon, Inc., on behalf of Placer Athens Limited Partners, LLC
	B-003	Timothy D. Teron of Hefner, Stark & Marois, LLP, on behalf of KT Communities
	B-004	Megan M. Quinn of Remy, Thomas, Moose and Manley, LLP, on behalf of a group of property owners who own 2,170 acres in the southern portion of the proposed Sierra Vista Specific Plan
	B-005	George M. Carpenter, Jr., of George M. Carpenter, Jr., Attorney at Law, on behalf of the Measure M Owners Group
	B-006	Deanne M. Green of Brookfield Land, on behalf of Brookfield Land
	B-007	Alicia Guerra of Cox, Castle & Nicholson LLP, on behalf of Blue Oaks Property Owners Group
	B-008	Alicia Guerra of Cox, Castle & Nicholson LLP, on behalf of Placer Ranch, Inc.
<b>Federal</b>	F-001	David Zilkoski of the National Geodetic Survey on behalf of National Ocean Service
	F-002	Nova Blazej of the U.S. Environmental Protection Agency
	F-003	Kenneth Sanchez of the U.S. Fish and Wildlife Service and Kent Smith of the California Department of Fish and Game
<b>Individuals</b>	I-001	Bill Pepoon, resident of Roseville, California
	I-002	Don Perera, resident of Rocklin, California
	I-003	Don Perera, resident of Rocklin, California
	I-004	Jim Hill, resident of Roseville, California
	I-005	Debbie Poling, resident of Roseville, California, on behalf of The Amoruso Way and Sunset Boulevard West Community
	I-006	Gunnar Henriouille
	I-007	Joel Neves, resident of Roseville, California
	I-008	Anna, Lisa, Michael, and Lori Carpenter, residents of Roseville, California
	I-009	Roger and Elaine Karlson, residents of Roseville, California

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**Comments on the Draft Tier 1 EIS/EIR (Continued)**

<b>Category</b>	<b>Comment Letter</b>	<b>Commenter</b>
<b>Individuals</b>  (Continued)	I-010	John R. Meers, resident of Roseville, California
	I-011	F. Renee Laffey, resident of Roseville, California
	I-012	Phil Zeitman, resident of Roseville, California
	I-013	Celia Ziegler, resident of Roseville, California
	I-014	Orley Anderson, resident of Rocklin, California
	I-015	Jack D. Wallace, resident of Roseville, California
	I-016	Eric Ahrens, resident of Roseville, California
	I-017	Melvin Borgman, resident of Pleasant Grove, California
	I-018	Faith Malcolm, resident of Elverta, California
	I-019	Jan McKinsey, resident of Roseville, California
	I-020	Kevin Kemper of the Law Offices of George E. Phillips, on behalf of Joan Allen and Sharon Musto (Placer County property owners)
	I-021	Bev Field, resident of Pleasant Grove, California (Transcript of public hearing from Diamond Court Reporters)
	I-022	Leo Trombatore, resident of Yuba City, California (Transcript of public hearing from Diamond Court Reporters)
	I-023	George Carpenter on behalf of the Sutter Point Specific Plan Owners Group (Transcript of public hearing from Diamond Court Reporters)
	I-024	Olga Widnes, local resident (Transcript of public hearing from Diamond Court Reporters)
I-025	Chris Poling, resident of Roseville, California (Transcript of public hearing from Diamond Court Reporters)	
<b>Local</b>	L-001	Jaskamal Singh of the Sacramento County Department of Transportation
	L-002	Dana Wyingner of the Placer County Health and Human Services, Environmental Health Services
	L-003	Deborah Kirschman of the Placer County Health and Human Services, Environmental Health Services
	L-004	Heather Trejo of the Placer County Water Agency

**Comments on the Draft Tier 1 EIS/EIR (Continued)**

<b>Category</b>	<b>Category</b>	<b>Category</b>
<b>Local</b>  (Continued)	L-005	Christine Turner of the Placer County Department of Agriculture Weights and Measures
	L-006	Paul Devereux of Reclamation District No. 1000
	L-007	Robert Sherry of the Sacramento County Planning and Community Development Department
	L-008	Lisa Wilson of the Sutter County Community Services Department
	L-009	John Law of the City of Sacramento Development Services Department
	L-010	Michael J. Johnson of the Placer County Community Development Resource Agency
	L-011	Terry A. Richardson of the City of Rocklin
	L-012	Mark Morse of the City of Roseville
<b>Non-Profit</b>	N-001	Terry Davis of the Sierra Club, Mother Lode Chapter
<b>State</b>	S-001	Kevin Boles of the State of California Public Utilities Commission
	S-002	Christopher Huitt of the State of California Department of Water Resources
	S-003	Rick Ward of the State of California Department of California Highway Patrol
	S-004	Kenneth Sanchez of the U.S. Fish and Wildlife Service and Kent Smith of the California Department of Fish and Game
	S-005	Dennis J. O'Bryant of the State of California Department of Conservation
<b>Tribal</b>	T-001	Greg Baker of the United Auburn Indian Community of the Auburn Rancheria

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**Comments on the Partially Revised Draft Tier 1 EIS/EIR (PRD)**

<b>Category</b>	<b>Comment Letter</b>	<b>Commenter</b>
<b>Business</b>	B-009	Kevin Kemper of the Law Offices of George E. Phillips, on behalf of Placer Athens, LP
	B-010	Timothy D. Teron of Hefner, Stark & Marois, LLP, on behalf of Placer 2780, LP
<b>Federal</b>	F-004	Enrique Manzanilla of the U.S. Environmental Protection Agency
	F-005	Kenneth Sanchez of the U.S. Fish and Wildlife Service
<b>Individuals</b>	I-026	Kevin Kemper of the Law Offices of George E. Phillips, on behalf of Joan Allen and Sharon Musto (Placer County property owners)
	I-027	Jonathon Burke, Pleasant Grove, California property owner
	I-028	Peter F. Burke, resident of Sutter County
	I-029	Rich Fabbre, resident of Roseville, California
	I-030	James and Diane Hintz, residents of Pleasant Grove, California
	I-031	Roy and Barbara Jackson, residents of Pleasant Grove, California
	I-032	Esther Kent, resident of Pleasant Grove, California
	I-033	Sharon L. Malone, Sankey Road property owner
	I-034	Chris McKenzie, resident of Pleasant Grove, California
	I-035	Jan McKinsey, resident of Roseville, California
	I-036	Myrtle Norsill, resident of Pleasant Grove, California
	I-037	Anonymous resident of Pleasant Grove, California
	I-038	Dan, Suzanne, Greg, Michele, Cole, and Chantz Risse, residents of Pleasant Grove, California
	I-039	Laurie Seifert, resident of Amoruso Way
	I-040	Dean Taneka
	I-041	Celia Ziegler, resident of Roseville, California
	I-042	Chris Burke, resident of Pleasant Grove, California
	I-043	Chris Burke, resident of Pleasant Grove, California
	I-044	Chris Burke, resident of Pleasant Grove, California
I-045	Jan McKinsey, resident of Roseville, California	
I-046	Loren Cook on behalf of WestPark Fiddymont Farm Neighborhood Association	
I-047	Robert Harmony, resident of Pleasant Grove, California	

**Comments on the Partially Revised Draft Tier 1 EIS/EIR (PRD) (Continued)**

<b>Category</b>	<b>Comment Letter</b>	<b>Commenter</b>
<b>Individuals</b> (Continued)	I-048	Diane Lanni, Sankey Road property owner
	I-049	Chris McKenzie, resident of Pleasant Grove, California
<b>Local</b>	L-013	Yushuo Chang of the Placer County Air Pollution Control District
	L-014	Michael J. Johnson of the Placer County Community Development Resource Agency
	L-015	Deborah Kirschman of the Placer County Health and Human Services, Environmental Health Services
	L-016	Terry A. Richardson of the City of Rocklin
	L-017	W. Craig Robinson of the City of Roseville
	L-018	Kamal Atwal of the Sacramento County Department of Transportation
	L-019	Doug Libby of the Sutter County Community Services Department
	L-020	Heather Trejo of the Placer County Water Agency
<b>Non-Profit</b>	N-002	Board of Directors of Protecting Earth and Animals with Compassion and Education, Peace
	N-003	Terry Davis of the Sierra Club, Mother Lode Chapter
	N-004	Marilyn Jasper of the Sierra Club, Placer Group
<b>State</b>	S-006	Moses Stiles of the State of California Public Utilities Commission
	S-007	Rick Ward of the State of California Department of California Highway Patrol
	S-008	Terry Roberts of the State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
	S-009	Moses Stiles of the State of California Public Utilities Commission
	S-010	Central Valley Flood Protection Board
<b>Tribal</b>	T-002	Katy Sanchez of the State of California Native American Heritage Commission



**1.0**  
**INTRODUCTION**



# **PLACER PARKWAY CORRIDOR PRESERVATION FINAL TIER 1 ENVIRONMENTAL IMPACT STATEMENT/ PROGRAM ENVIRONMENTAL IMPACT REPORT**

## **1.0 INTRODUCTION**

This is the Final Tier 1 Environmental Impact Statement/Program Environmental Impact Report (hereinafter referred to as the Final Tier 1 EIS/EIR) for the Placer Parkway Corridor Preservation Project, in Placer and Sutter counties, California. Placer Parkway is proposed as a new east-west roadway linking State Route (SR) 70/99 in Sutter County east to SR 65 in Placer County.

The Final Tier 1 EIS/EIR consists of this document and two additional Placer Parkway Corridor Preservation Tier 1 Draft EIS/EIR documents that are listed later in this Introduction.

This document contains public comments received on the Draft Tier 1 EIS/EIR and the Partially Revised Draft Tier 1 EIS/EIR, which consisted of letters, e-mails and other written comments received by the Federal Highway Administration (FHWA) and by Placer County Transportation Planning Agency (PCTPA) on behalf of the South Placer Regional Transportation Authority (SPRTA), and oral comments received at the four public hearings identified in Section 2.8 below. All of these comments are included in Chapter 3 of this document, as are responses to those comments.

In addition to this document which provides comments and responses and other material, this Final Tier 1 EIS/EIR includes the following documents:

- Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report (Draft Tier 1 EIS/EIR) dated June 29, 2007 (consisting of two volumes). The Draft Tier 1 EIS/EIR was circulated for public comment from July 2, 2007 through September 25, 2007, in compliance with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). Public hearings to receive comments on the Draft Tier 1 EIS/EIR were held on August 6 and August 8, 2007, as described in more detail in Section 2.8.
- Partially Revised Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report (Partially Revised Draft Tier 1 EIS/EIR, or PRD) dated January 30, 2009 (consisting of one volume). The Partially Revised Draft Tier 1 EIS/EIR was circulated for public comment from January 30, 2009 through May 11, 2009, in compliance with NEPA and CEQA. Public hearings to receive comments on the Partially Revised Draft Tier 1 EIS/EIR were held on February 23 and February 25, 2009, as described in more detail in Section 2.8.

This Final Tier 1 EIS/EIR (including the Draft and Partially Revised Draft EIS/EIR documents listed above, which are provided on a CD) is the Final Tier 1 EIS/EIR for purposes of NEPA. It will be noticed in the Federal Register on December 11, 2009 and will be made available for 30 days after that date, prior to FHWA making a decision in accordance with NEPA regulations (40 Code of Federal Regulations [CFR] Section 1502.19). Following public comment, FHWA

may select the preferred corridor alignment alternative, or another alternative, and a Record of Decision that presents the basis for the decision may be published in the Federal Register.

This Final Tier 1 EIS/EIR (including the Draft and Partially Revised Draft EIS/EIR documents listed above) is also the Final Program EIR for purposes of CEQA. With respect to CEQA, the SPRTA Board of Directors may (1) certify this Final Program EIR as complete, make Findings and adopt a Statement of Overriding Considerations, and may approve a preferred corridor alignment alternative based on this Final Program EIR pursuant to CEQA guidelines Section 15089 regarding selection of a project alternative, or (2) abandon the project, or (3) take some other action. If SPRTA approves a corridor alignment alternative based on the Final Program EIR, and as funding becomes available, SPRTA and its member jurisdictions (Placer County and the cities of Roseville, Rocklin, and Lincoln) could preserve right-of-way for all or part of the selected corridor. Sutter County has been part of the planning for the Placer Parkway project and the development of this Final Tier 1 EIS/EIR since 2003. The Sutter County Board of Supervisors will separately consider formal adoption of the preferred corridor alignment alternative within its jurisdiction, based on this Final Program EIR.

The SPRTA Board of Directors will consider certification of this Final Program EIR as complete and will consider approval of a preferred corridor alignment alternative at 10:45 a.m. on December 3, 2009 at Placer County Board of Supervisors Chambers, 175 Fulweiler Avenue, Auburn, CA 95603.

This Final Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation project is organized into seven chapters:

- Chapter 1 Introduction.** This chapter provides information on the contents of the Final Tier 1 EIS/EIR and provides information on the organization of the document.
- Chapter 2 Executive Summary.** This chapter summarizes the need and purpose for the project; describes the proposed project and alternatives; summarizes environmental effects; identifies the Preferred Alternative under NEPA (subject to FHWA determination) and the Environmentally Superior Alternative under CEQA; summarizes public participation, consultation and coordination; and includes a table summarizing impacts for all project alternatives analyzed. Where the table has been revised from those described in the Draft Tier 1 EIS/EIR and the Partially Revised Draft Tier 1 EIS/EIR, additions are shown as underlined and deletions are shown as ~~strike through~~.
- Chapter 3 Comments and Responses.** This chapter includes all comments received by FHWA and PCTPA on the Draft Tier 1 EIS/EIR and the Partially Revised Draft Tier 1 EIS/EIR, including comments received at public hearings. Responses are provided to these comments.

- Chapter 4 Revisions to the Draft Tier 1 EIS/EIR.** This chapter presents the text changes to the Draft Tier 1 EIS/EIR, including changes identified in the PRD and in various responses in Chapter 3, and corrections of minor typographical errors.
- Chapter 5 List of Preparers and Reviewers**
- Chapter 6 List of Agencies, Organizations, and Persons to Whom Copies are Sent**
- Chapter 7 References**
- Appendices**
- Appendix A – Modified NEPA/404 Process**
  - Appendix B – Public Involvement Notices and Materials**
  - Appendix C – Purpose and Need Statement – Agency Concurrence Version**
  - Appendix D – Mitigation Monitoring and Reporting Program**
  - Appendix E – Final Tier 1 Section 4(f) Evaluation**

This Final Tier 1 EIS/EIR is available for review at the Placer County Transportation Planning Agency, 299 Nevada Street, Auburn, CA 95603. Copies can also be obtained electronically from the Placer County Transportation Planning Agency’s project website at [www.pctpa.net](http://www.pctpa.net). It is also available for review at the following locations:

Placer County Transportation Planning Agency 299 Nevada Street, Auburn, CA	Sutter County Planning Department 1130 Civic Center Blvd., Yuba City, CA
Placer County Planning Department 3091 County Center Drive, Auburn, CA	Sacramento County Planning Department 827 7th Street, Room 230, Sacramento, CA
Placer County Public Works Department 3091 County Center Drive, Auburn, CA	Roseville Public Library - Downtown 225 Taylor Street, Roseville CA
Placer County Library 350 Nevada Street, Auburn, CA	Roseville Public Library - Maidu 1530 Maidu Drive, Roseville CA
Placer County Library, Loomis 6050 Library Drive, Loomis, CA	Rocklin Library 5460 Fifth Street, Rocklin, CA
Sutter County Library, Main Branch 750 Forbes Avenue, Yuba City, CA	Lincoln Library 590 Fifth Street, Lincoln, CA
Sutter County Library, Pleasant Grove Branch 3093 Howsley Road, Pleasant Grove, CA	Sierra College Library 5000 Rocklin Road, Rocklin, CA
Sutter County Library, Browns Branch 1248 Pacific Avenue, Rio Oso, CA	Sacramento County Library, North Natomas 2500 New Market Drive, Sacramento, CA

Sacramento County Public Library  
828 I Street, Sacramento, CA

California State University  
2000 State University Drive–East, Sacramento, CA

Sacramento County Library,  
North Highlands – Antelope  
4235 Antelope Road, Antelope, CA

Upon request, FHWA/Caltrans/SPRTA will work to provide special provisions for persons with sensory disabilities.

**2.0**  
**EXECUTIVE SUMMARY**





## 2.0 EXECUTIVE SUMMARY

### 2.1 INTRODUCTION

SPRTA proposes to select and preserve a corridor for the future construction of Placer Parkway, a new east-west roadway linking SR 70/99 in Sutter County east to SR 65 in Placer County (see Figure 1, Project Alternatives).

### 2.2 PURPOSE AND NEED FOR PLACER PARKWAY

Placer Parkway is intended to reduce anticipated congestion on both the local and regional transportation system and to advance economic development goals in south Sutter County and southwestern Placer County. Please see Appendix C for the agency concurrence version of the Purpose and Need Statement, and Chapter 1 of the Draft Tier 1 EIS/EIR for more detailed information, summarized below.

#### 2.2.1 Need for Placer Parkway

**Need to Preserve Right-of-Way:** The project vicinity includes some of the fastest growing communities in the Sacramento Metropolitan region—Roseville, Rocklin, Lincoln, and the Sunset Industrial Area. SACOG projects that the population in southwestern Placer County will nearly double between 2000 and 2025. Employment in the SR 65 high-technology corridor is expected to grow even faster than the population. The anticipated development to support this increased population and employment will dramatically increase travel demand over the next 20 years and beyond. The study area has been under intense development pressure. While the current economic climate has slowed the pace of this development pressure, at least two major specific plans have been approved within the last year (Regional University Specific Plan and Sutter Pointe Specific Plan), and several others are proceeding through environmental review. Based on the number of recent applications or pre-application submittals, and interest by the development community, it is apparent that it will become increasingly difficult and expensive to identify an appropriate corridor as a solution that meets the ultimate purpose of the proposed project. Failure to preserve a corridor as soon as feasible could result in potentially increased costs and greater environmental impacts because ongoing planning for development could result in approved projects that would foreclose opportunities for locating the roadway in areas that would minimize environmental impacts, leading to substantially higher mitigation costs.

**Travel Demand and Anticipated Congestion:** The anticipated population growth in south Sutter County, southwestern Placer County, and northern Sacramento County will dramatically increase travel demands over the next 20 years and beyond. Travel speeds/travel times from Placer County to both Sacramento and Sutter counties are projected to deteriorate over the next 20 years, even with improvements to local roadways already identified in local general plans.

**Job Growth and Goods Movement:** The Interstate 80 (I-80) corridor is the major trans-Sierra roadway in northern California accommodating the movement of goods and services. The combined increase of vehicles used for the movement of goods and services as well as passenger vehicles has led to increased congestion, which in turn increases travel times in the study area and competition for roadway capacity. Congestion on the regional roadways connecting Placer

County with Sutter and Sacramento counties will adversely impact access to jobs. The projected increase in travel times will affect the movement of goods and people, and will have an impact on the region's economy. The high-technology industry in the SR 65 corridor, plus development of Sutter County's industrial/commercial reserve area, requires dependable access to airports to move high-value/time-critical freight. Thus, direct and convenient access and reliable travel times to both the Sacramento International Airport and the Lincoln Regional Airport are very important to this growing regional job center.

## 2.2.2 Purpose of Placer Parkway

**Preserving Right-of-Way:** The goal of the Tier 1 EIS/EIR for the proposed project is to preserve right-of-way for a new or upgraded east-west connector between SR 65 and SR 70/99 serving cities and unincorporated areas across southwestern Placer County and south Sutter County.

**Responding to Existing and Anticipated Travel Demand:** The proposed Placer Parkway would be designed to reduce pressure on the existing transportation network and to address anticipated future congestion on the local roadway system in southwestern Placer County and South Sutter County. The proposed project would be designed to reduce total vehicle hours traveled during the morning and evening peak commute periods (i.e., 6 to 9 a.m. and 3 to 6 p.m.), reduce the amount and duration of travel that is spent in congested conditions in southwestern Placer County, and improve travel times between the SR 65 corridor and SR 70/99 by maintaining a travel speed at or near the free flow speed of the Parkway, which on a freeway reflects Level of Service (LOS) C to D conditions.<sup>1</sup>

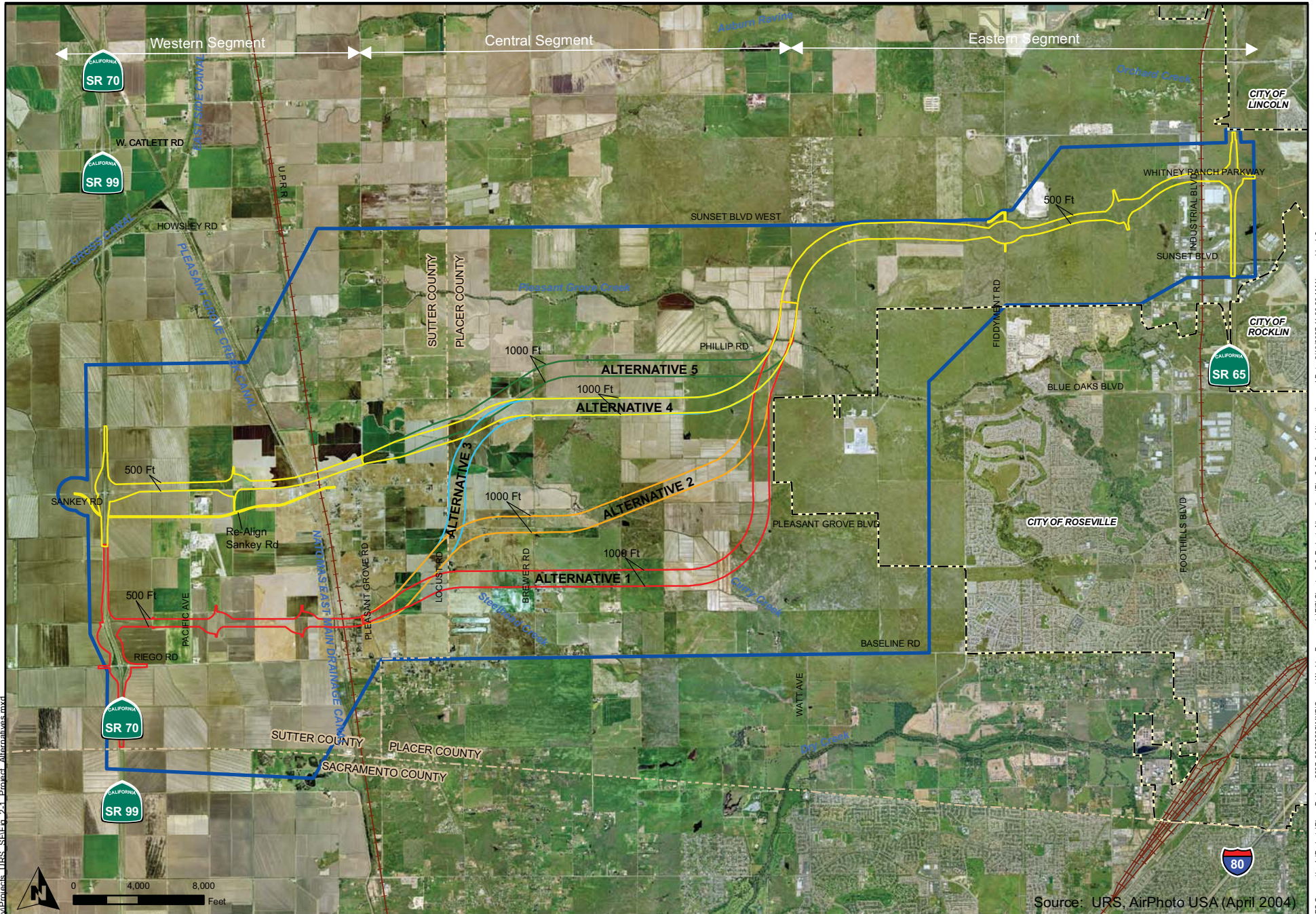
**Providing Access to the Regional Transportation System in Areas Planned or Projected for Job Growth:** Placer Parkway would be designed to improve regional accessibility for businesses and jobs in the project vicinity, including access to SR 70/99. The Parkway is proposed to serve major travel flows from SR 65 to (1) the south Sutter Industrial area, (2) Sacramento International Airport, (3) Sacramento County, and (4) the Interstate 5 (I-5) corridor.

## 2.3 DESCRIPTION OF THE PROPOSED PROJECT AND CORRIDOR ALIGNMENT ALTERNATIVES ANALYZED

The proposed project being considered by SPRTA is to select and preserve a 500- to 1,000-foot-wide corridor in the project study area, within which the future four- or six-lane Placer Parkway may be constructed. Five build alternatives and a No-Build Alternative were analyzed in the Draft Tier 1 EIS/EIR and the PRD. Depending upon the alternative, the corridor's length ranges from a minimum of 14.2 miles to a maximum of 16.2 miles. The selected corridor would contain the roadway, including the median, travel lanes, shoulder, associated access ramps, and a no-development buffer zone. The alternatives are described in detail in the Draft Tier 1 EIS/EIR

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<sup>1</sup> LOS is a qualitative measure of the effect of a number of factors which include speed, travel time, traffic interruptions, freedom to maneuver, safety, driving comfort/convenience, and operation costs. LOS is designated A through F, from best to worst, covering the entire range of traffic operations that might occur. LOS E describes conditions approaching or at maximum capacity. Free-flow speed and LOS C and D conditions on a freeway do not preclude an alternative based on expanding existing roads, a non-freeway facility, a Transportation System Management alternative, a shorter Parkway Alternative, or a combination of the aforementioned.



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URS Corporation L:\Projects\Placer\_Parkway\2007\_20\86565\MXD\Current Working Documents\IEIS\Chapter\_2-0\_Project\_Alternatives\Fig\_2-1\_Project\_Alternatives.mxd Date: 2/13/2007 11:26:29 AM Name: jtkew@u

Source: URS, AirPhoto USA (April 2004)

- Alternative 1
- Alternative 2
- Alternative 3
- Alternative 4
- Alternative 5
- County Boundary
- City Boundary
- Study Area Boundary



Tier 1 EIS/EIR

Project Alternatives

**Figure 1**  
**August 2009**



(pages 2-12 through 2-21). Throughout, the study area has been divided into three segments, as shown on Figure 1, which depicts these segments and the build alternatives analyzed in this Final Tier 1 EIS/EIR:

- The Western Segment extends from SR 70/99 to Pleasant Grove Road in Sutter County.
- The Central Segment extends from Pleasant Grove Road in Sutter County to approximately 2,300 feet north of Pleasant Grove Creek in Placer County.
- The Eastern Segment extends from approximately 2,300 feet north of Pleasant Grove Creek to SR 65 in Placer County.

Five or six interchanges are proposed, depending on the corridor alignment alternative. Although the Parkway would be designed and construction-level impacts analyzed during Tier 2, several assumptions have been made about potential design and configuration concepts for the purpose of this Final Tier 1 EIS/EIR. These assumptions would be subject to further development and refinement, and specific decisions about design of the roadway would be made during the Tier 2 process. For example, the number, location, and design of over-crossings would be determined at the time of final Parkway design, in consultation with local jurisdictions. Several key assumptions about the future roadway used to develop the environmental analysis can be found in Chapter 2 of the Draft Tier 1 EIS/EIR.

As envisioned, Placer Parkway would include a corridor that is wider than what is needed for the proposed roadway, with lands adjacent to the facility called “no-development buffer zones,” which would be intended to further a “parkway” concept by maintaining a visual open space concept and encouraging linkages to other open spaces along the corridor, preserving open space and agricultural uses adjacent to the Parkway, providing opportunities to preserve biological resources along the corridor; and limiting future development along the Parkway from encroaching to the facility’s edge by maintaining it as a zone where development is either not permitted or is severely restricted. Limiting access to the Parkway would preserve a high-speed facility, through preventing unplanned Parkway interchanges from being constructed by controlling the land required for such interchanges, and would limit opportunities for growth inducement that might otherwise result from provision of access in areas not planned for growth.

It is intended that the no-development buffer zones would be owned and managed in the future to achieve these objectives. Section 2.2.4.2 of the Draft Tier 1 EIS/EIR describes a number of mechanisms that may be used to control development and other activity within the 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. Although the Draft Tier 1 EIS/EIR included the no-development buffer zone as part of the project description, it did not assume any environmental benefits. It is not the intent of the project that the buffer provides mitigation for direct adverse environmental impacts from the project.

Since the value of the no-development buffer zones to maintain the parkway concept and limit access depends to some extent on the adjacent land uses, 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, taking into account the primary objective of restricting future access to the Parkway, and subject to agreements made under the Modified NEPA/404 process described in Section 2.8.2 below and in Appendix A.

## 2.4 EVALUATION OF OTHER ALTERNATIVES

The following alternatives were considered, evaluated, and rejected or modified, all as described in more detail in Section 2.5 of the Draft Tier 1 EIS/EIR:

1. **Project Study Report (PSR) Alternatives:** Early screening was initiated in the Conceptual Plan/Placer Parkway Interconnect Study and developed in more detail in the PSR, which resulted in the PSR Alternatives;
2. **Modification of the PSR Alternatives:** The PSR Alternatives were modified based on screening and preliminary evaluation that focused on avoidance of environmental resources, with special focus on aquatic resources, and including input from the advisory committees and the public;
3. **Alternatives Eliminated for Reasons Related to Purpose and Need, Safety, and/or Environmental Considerations:** Alignments were evaluated with respect to their ability to meet purpose and need and to avoid out-of-direction travel with the major travel flows that the Parkway would serve. Connections to SR 70/99 and SR 65 were evaluated relative to Caltrans' minimum spacing requirements between interchanges on freeways. Alignments or portions of alignments were evaluated with respect to conflicts with existing environmental resources or planning processes, including but not limited to avoidance of an historic ranch complex, large vernal pool areas, wetlands, farmland, residences, the active portion of the City of Roseville Retention Basin, and designated recreation areas in the West Roseville Specific Plan;
4. **Avoidance Alternatives – Modified NEPA/404 Process:** Through participation in a modified NEPA/404 process with federal agencies, various alternatives were evaluated that would avoid or reduce the need to construct a Parkway, including a Transportation Systems Management (TSM) Alternative, a Shorter Parkway Alternative, and a Shorter Parkway Plus TSM Alternative; and
5. **Landowner-Identified Alignments:** Evaluations of four alignments identified by a landowner were conducted.

## **2.5 SUMMARY OF EFFECTS**

Revised Table ES-1 at the end of this chapter summarizes the potential environmental impacts of the corridor alignment alternatives. Key differences among the corridor alignment alternatives are presented below. More detailed information is provided in the Draft Tier 1 EIS/EIR and the PRD.

The No-Build Alternative would not have the potential environmental impacts of the corridor alignment alternatives described below, except with respect to traffic, air quality, and noise, which would be substantially worse than for all of the build alternatives.

### **2.5.1 Direct Effects**

#### **Land Use**

The build alternatives would involve land use conversion ranging from a minimum of approximately 1,627 acres under Alternative 5 to a maximum of 1,918 acres under Alternative 1. They would result in bisecting a number of parcels ranging from a minimum of 26 parcels under Alternative 1 to a maximum of 35 parcels under Alternative 5.

All build alternatives could present similar potential inconsistencies with General Plan policies involving preservation of agriculturally designated areas.

#### **Socioeconomics**

Three of the build alternatives, Alternatives 1, 4, and 5, would affect existing residential communities. All of the build alternatives would displace homes or farms, ranging from a minimum of three under Alternative 3 to a maximum of ten under Alternative 5. All of the build alternatives would affect the same two existing employment centers in the Sunset Industrial Area Plan. In addition, Alternatives 4 and 5 would also affect two other existing employment areas in Sutter County.

#### **Farmlands**

The build alternatives would affect between 1,578 and 1,814 acres of farmland, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Alternative 5 would affect the least – approximately 1,578 acres. Alternative 3 would affect the most – approximately 1,814 acres. Each alternative would convert Williamson Act contracted lands, ranging from a minimum under Alternative 1 of 119.85 acres to a maximum under Alternative 2 of 243.7 acres.

#### **Public Services and Utilities**

The build alternatives would similarly affect one municipal facility, the City of Roseville Retention Basin property, although no retention facilities are planned in the area affected. There could also be future impacts on the Western Regional Sanitary Landfill Expansion area under the cumulative scenario.

## **Visual and Aesthetics**

Alternatives 1, 2, and 3 would result in Moderate/High visual impacts, while impacts associated with Alternatives 4 and 5 would be Moderate.

## **Cultural Resources**

No known archaeological sites would be affected by the build alternatives. All build alternatives could affect one built environment resource: Reclamation District No. 1000 Rural Historic District, which is a property that is eligible for the National Register of Historic Places and California Register of Historical Resources. Alternatives 1, 2, and 3 could also affect three other properties that require further evaluation to determine NRHP and CRHR eligibility. All of the build alignment alternatives are of similarly high paleontological sensitivity, and the alternatives could impact unknown paleontological resources.

## **Traffic and Transportation**

All of the build alternatives would result in an increase in vehicle miles traveled (VMT), a decrease in Vehicle Hours of Delay (VHD), and improvements in LOS on the majority of roadways in the study area.

Under the No-Build Alternative, VMT is projected to be 17,723,337 in the opening year. VMT for build alternatives would range from a minimum of 17,844,410 under Alternative 1 to a maximum of 17,871,704 under Alternative 5. In 2040 the No-Build Alternative VMT is projected to be 25,977,539, and VMT under the build alternatives would range from a minimum of 26,419,100 under Alternative 1 to a maximum of 26,482,608 under Alternative 3.

By 2040, portions of SR 70/99 and SR 65 would operate at LOS F with or without the project; the build alternatives would worsen the LOS on portions of these roads, as well as on four other roadways. Under all build alternatives, VHD would improve as compared to the No-Build Alternative. However, there is no clear preference among build alternatives with respect to traffic because the differences among them are not substantive. The increase in VMT among all build alternatives differs by less than one-quarter of 1 percent. The decrease in VHD among all build alternatives differs by less than 1 percent overall.

## **Air Quality**

Construction emissions would exceed the Placer County Air Pollution Control District (PCAPCD) and Feather River Air Quality Management District (FRAQMD) construction emissions thresholds for reactive organic gases (ROG), oxides of nitrogen (NO<sub>x</sub>), and particulate matter less than or equal to 10 microns in diameter (PM<sub>10</sub>). In 2020, all build alternatives would exceed FRAQMD significance thresholds for ROG during operation; all build alternatives would exceed PCAPCD and FRAQMD significance thresholds for NO<sub>x</sub> during operation. In 2040, all build alternatives would exceed FRAQMD significance thresholds for ROG; all build alternatives would exceed PCAPCD significance thresholds for carbon monoxide (CO); all build alternatives exceed FRAQMD and PCAPCD significance thresholds for NO<sub>x</sub>.



## **Noise**

Three of the build alternatives would result in noise levels at a number of existing residential units exceeding 66 A-weighted decibels (dBA) in the opening year. This would range from a minimum of one unit being affected under Alternative 5 and a maximum of two units being affected under Alternatives 2 and 3. These impacts would be the same in 2040. No assumptions regarding new residential units were taken into account in these analyses.

The build alternatives would result in projected noise increases of more than 12 dBA on one roadway in 2020. This effect would also occur under the No-Build Alternative. In 2040, the number of such roadways would increase to ten for Alternatives 4 and 5, eleven for Alternatives 1, 2, and 3, and fifteen under the No-Build Alternative.

## **Hydrology and Floodplains**

All build alternatives would result in an increase in impervious area ranging from a minimum of 622 acres under Alternative 5 to a maximum of 745 acres under Alternative 4. These impacts would be mitigated according to regulatory and permit requirements.

All build alternatives would result in new stream or canal crossings. These would range from a minimum of ten crossings under Alternatives 4 and 5 and a maximum of sixteen under Alternative 1. All build alternatives would also cross the 100-year and 500-year floodplains. Impacts would range from 269 acres under Alternative 1 to 370 acres under Alternatives 4 and 5. Impacts on the 500-year floodplain would range from a minimum of 87 acres under Alternative 5 to a maximum of 201 acres under Alternatives 2 and 3.

## **Water Quality**

All build alternatives would result in an increase in impervious area ranging from a minimum of 622 acres under Alternative 5 to a maximum of 745 acres under Alternative 4. These impacts would be mitigated according to regulatory and permit requirements.

All build alternatives would traverse watersheds, with Alternatives 4 and 5 crossing four watersheds and Alternatives 1, 2, and 3 crossing five. These impacts would be mitigated according to regulatory and permit requirements.

## **Biological Resources**

All build alternatives would affect biological resources. All build alternatives would affect riparian habitat, ranging from a minimum of 4.8 acres under Alternatives 4 and 5 to a maximum of 12.3 acres under Alternative 2. Build alternatives would also affect the habitat of special-status species. Potential giant garter snake habitat would be affected, ranging from a minimum of approximately 268 acres under Alternatives 4 and 5 to a maximum of approximately 340 acres under Alternatives 1, 2, and 3. Potential Swainson's hawk and white-tailed kite nesting habitat would be affected, ranging from a minimum of 3.3 acres under Alternative 4 to a maximum of approximately 7.9 acres under Alternative 2. Potential Swainson's hawk foraging habitat would be affected, ranging from a minimum of approximately 759 acres affected under Alternative 5 to a maximum of approximately 10,244 acres under Alternative 1. Potential Valley elderberry

longhorn beetle habitat would be affected, ranging from a minimum of approximately 1.2 acres under Alternatives 3, 4, and 5 to a maximum of approximately 1.9 acres under Alternative 1.

All build alternatives would result in effects on wetlands ranging from a minimum of 28 acres under Alternative 5 to a maximum of 35.8 acres under Alternative 1. Effects on vernal pool complexes would range from a minimum of 107 acres under Alternative 4 to a maximum of 127 acres under Alternative 3.

### **Hazardous Waste/Materials**

All of the build alternatives would be within the vicinity of potential sources of hazardous materials due to their proximity to sites of Recognized Environmental Concern. Three such sites are in the vicinity of Alternatives 1, 2, and 3, and four are in the vicinity of Alternatives 4 and 5. Potential hazards associated with these sites would be mitigated according to regulatory requirements.

### **2.5.2 Other Effects**

With respect to secondary and indirect impacts, growth inducement, and cumulative impacts, little or no differentiation was identified among the build alternatives, except as described below.

## **2.6 PREFERRED ALTERNATIVE UNDER NEPA**

In accordance with FHWA's NEPA regulations, and after consideration of the public and agency comments received on the Draft Tier 1 EIS/EIR, the PRD, and ongoing coordination with federal, state and local resource/regulatory agencies, a Preferred Alternative has been identified by FHWA. Alternative 5 with a no-access buffer is the corridor alignment alternative identified as the Preferred Alternative for purposes of the NEPA process.

With respect to direct impacts, Alternatives 1, 2, and 3 would have substantially more impacts than Alternatives 4 or 5. Alternatives 4 and 5 are generally similar, except that Alternative 4 has fewer direct impacts to potentially bisected parcels, homes and farmsteads, and to vernal pool complexes than Alternative 5, and Alternative 5 has fewer direct impacts to Swainson's hawk and white-tailed kite foraging habitat, farmlands, and wetlands, and it is the least archaeologically sensitive alignment.

Additional key factors favoring Alternative 5 over Alternative 4 and leading to the selection of the Preferred Alternative under NEPA include the following:

- Alternative 5 with a no-access buffer has been determined to be the corridor alignment alternative most likely to contain the Least Environmentally Damaging Practicable Alternative (LEDPA) by the U.S. Army Corps of Engineers (USCOE) and the U.S. Environmental Protection Agency (U.S. EPA).
- Alternative 5 has less potential for inducing growth.
- Alternative 5 has the least potential for secondary and indirect impacts on biological resources, including the lowest potential for habitat fragmentation.

- Alternative 5 is most consistent with the regional habitat conservation plan (Placer County Conservation Plan (PCCP)) being developed by Placer County.
- Alternative 5 is the shortest alternative, which limits its potential direct effects and construction costs.
- Local jurisdictions support Alternative 5.

Through the modified NEPA/404 process (described in Appendix A) and specifically concurrence that Alternative 5 with a no-access buffer is the corridor most likely to contain the LEDPA, a conservation framework was identified to further refine the general mechanisms to limit new interchanges in the no-development buffer zone (identified in Draft Tier 1 EIS/EIR Section 2.2.4) in portions of the project area's Western and Central segments. This refinement is to be applied to an approximately 5.1-mile-long segment (from the Natomas East Main Drainage Canal to a point approximately 3,250 feet west of the Reason Farms Retention Basin's "panhandle"). Figure A-1 in Appendix A depicts this area.

This conservation framework focuses on the use of a conservation easement to be implemented during the Tier 2 stage to help preclude new interchanges and help preserve agricultural and open space lands. The attributes of the easement would include the following:

- The easement will be in the form of a conservation easement created pursuant to California Civil Code Section 815.
- The easement will be perpetual in duration. The no-access provision will be binding on successive owners for the purpose of retaining the land predominantly in its natural, scenic, historical, agricultural, forested or open-space condition. (California Civil Code §815.1, §815.2)
- An instrument creating the conservation easement will be recorded in the county where the land is located. (California Civil Code §815.5)
- The easement will be held by a tax-exempt nonprofit organization qualified under Section 501(c)(3) of the Internal Revenue Code and qualified to do business in California that has as its primary purpose the preservation, protection, or enhancement of land in its natural, scenic, historical, agricultural, forested, or open-space condition or use.
- If the easement will not be accepted by such non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be to convey it to a federal agency or to a state government entity such as the California Department of Fish and Game. Failing that, the NEPA/404 agencies will work together through the NEPA/404 process to identify and to concur on an acceptable conservation easement holder.
- The terms of the easement may be enforced in court, and violation of the easement may result in damages, including the cost of restoration.

- Under the Subdivision Map Act, a city or county must generally deny approval of a tentative map if the land is subject to an open-space easement, agricultural conservation easement, or conservation easement.
- The easement will include a grantor's covenant not to allow access to right-of-way from adjacent land, and not to participate in planning or construction of interchange(s) between the highway project and any surface streets from 3,250 feet west of the western boundary of the Reason Farms Retention Basin panhandle to the Natomas East Main Drainage Canal. The easement is expressly to provide that this covenant is specifically enforceable. The easement may also identify certain third-party beneficiaries with the right to enforce the covenant.
- The covenant not to allow access will include a specific prohibition regarding interchange structures in the airspace over the property.

This conservation framework is incorporated and made a part of the Preferred Alternative identified under NEPA, as well as the Environmentally Superior Alternative under CEQA, as described below. Please also refer to Section 2.8.2 below for a description of the Modified NEPA/404 Process, through which the LEDPA was identified.

## **2.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE UNDER CEQA**

Alternative 4 was identified as the Environmentally Superior Alternative in the Draft Tier 1 EIS/EIR (see Chapter 5). Based on new information provided in the PRD, and as described in Chapter 4 of this Final Tier 1 EIS/EIR, Alternative 5 is identified as the Environmentally Superior Alternative.

Alternatives 4 and 5 are generally similar. The changes that led to the identification of Alternative 5 as the Environmentally Superior Alternative in this Final Tier 1 EIS/EIR are the following:

- New information in the California Department of Conservation Division of Land Resource Protection Farmland Mapping and Monitoring Program. Based on updated information that became available after analysis for the Draft Tier 1 EIS/EIR was completed, the alternative with the least total impacts on all categories of farmland changed from Alternative 4 to Alternative 5.
- The information that Alternative 5 is the least archaeologically sensitive of all alternatives was not previously considered in the CEQA evaluation of the Environmentally Superior Alternative.

## **2.8 PUBLIC PARTICIPATION, CONSULTATION, AND COORDINATION**

### **2.8.1 Public Involvement Process**

The Placer Parkway Corridor Preservation Tier 1 EIS/EIR development process included extensive outreach to the public. The components of the public participation program leading up to publication of the Draft Tier 1 EIS/EIR are documented in Appendix A of that document.

Following publication of the Draft Tier 1 EIS/EIR, coordination and consultation continued through the Project Development Team and with individual jurisdictions, interested stakeholders, community members, and property owners. Federal agency coordination also continued through the Modified NEPA/404 process described in Section 2.8.2 below and in Appendix A of this Final Tier 1 EIS/EIR.

Scoping meetings were held in Roseville and Pleasant Grove in October 2003. Community meetings on potential corridor alignment alternatives were held in Roseville and Pleasant Grove in August 2004. Public hearings were held to receive comments on the Draft Tier 1 EIS/EIR and the Partially Revised Draft Tier 1 EIS/EIR in August 2007 and February 2009, respectively. Public notices and public hearings are described in Sections 2.8.3 and 2.8.4, respectively, and public hearing transcripts are included in Appendix B.

Four newsletters and PCTPA's web site kept the public informed as to project progress. The February 2007 newsletter provided information regarding the corridor alignment alternatives selected for analysis in the Draft Tier 1 EIS/EIR. The July 2007 newsletter provided information about the Draft Tier 1 EIS/EIR. The January 2009 newsletter let the public know that a Partially Revised Draft Tier 1 EIS/EIR was in preparation. A final newsletter provided information about this Final Tier 1 EIS/EIR and the Preferred Alternative it identifies. Copies of these newsletters are provided in Appendix B.

### **2.8.2 Modified NEPA/404 Process**

The goal of the modified NEPA/404 process undertaken for the Placer Parkway Tier 1 EIS/EIR process was to ensure that Tier 1 decisions reflect careful consideration of the 404(b)(1) Guidelines (40 CFR 230), which are binding, substantive regulations implementing the Clean Water Act. FHWA, the California Department of Transportation (Caltrans), SPRTA, the USCOE, and the U.S. EPA agreed to engage in a modified NEPA/404 process, a federal coordination process, based on the NEPA/404 process set forth in the 1993 Memorandum of Understanding among federal agencies<sup>2</sup>, modified for Tier 1 to reflect decisions made at Tier 1, and to anticipate the permit application requirements at Tier 2. The U.S. Fish and Wildlife Service participated informally in portions of this process.

The modified process for Tier 1 commits the agencies to seek concurrence on five points:

1. Purpose and Need
2. Criteria for Selecting the Range of Alternatives
3. Range of Alternatives
4. Alternative(s) Most Likely to Contain the Least Environmentally Damaging Practicable Alternative
5. Mitigation Framework

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<sup>2</sup> Signed by Federal Highway Administration, Federal Transit Administration, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Transportation, Arizona Department of Transportation, and Nevada Department of Transportation (1993). Here and elsewhere this document was referred to as the 1993 document. However, it was not fully executed until 1994, and is sometimes referred to elsewhere as a 1994 document.

This process has resulted in concurrence on all five points. Formal requests for concurrence were made by FHWA (acting on its own behalf, Caltrans, and PCTPA acting on behalf of SPRTA), and concurrence letters were received from the USCOE and the U.S. EPA. The Modified NEPA/404 Process Memorandum of Understanding and agency concurrence letters are included in Appendix A.

Alternative 5 with a no-access buffer has been identified as the corridor most likely to contain the LEDPA. Alternative 5 includes the conservation framework described in Section 2.6 above. FHWA and SPRTA have agreed to incorporate the conservation easement as part of the Tier 2 project description.

### **2.8.3 Public Notices**

Informational notices for two public scoping meetings were mailed in September 2003 to community members in the project study area, including businesses, community leaders, agency staff, environmental groups, project advisory committee members, local elected officials, property owners, and the general public. Informational notices for two public workshops were mailed to the same group in September 2004. Copies of these notices are provided in Appendix B of the Draft Tier 1 EIS/EIR. More than 1,300 notices were mailed.

In late June 2007, a Notice of Availability of the Placer Parkway Draft Tier 1 EIS/EIR was mailed to approximately 1,500 agencies, organizations, and interested individuals. This notice also identified the dates of two public hearings on the Draft Tier 1 EIS/EIR. In January 2009, a Notice of Availability of the Placer Parkway Partially Revised Draft (PRD) Tier 1 EIS/EIR was mailed to an updated mailing list. This notice also identified the dates of two public hearings on the PRD. The original comment period began on January 23, 2009 and closed on March 16, 2009. In March 2009, an additional Notice of Availability was issued to provide public notification of an extension to the comment period for an additional 45 days. The additional time for comments began March 27, 2009 and ended on May 11, 2009. These notices are provided in Appendix B of this Final Tier 1 EIS/EIR. Federal notices included the following: U.S. EPA Notice of Availability (NOA) of the Draft Tier 1 EIS published in the Federal Register (FR) on July 6, 2007 (72 FR 37,006); U.S. EPA notice regarding extension of the comment period published in the Federal Register on August 17, 2007 (72 FR 46,218); U.S. EPA notice regarding extension of the comment period published in the Federal Register on September 14, 2007 (72 FR 52,558); NOA regarding U.S. EPA comments published on October 5, 2007 (72 FR 57,029); FHWA NOA of the PRD published in the Federal Register on January 30, 2009 (74 FR 5,719); U.S. EPA NOA of the PRD on March 27, 2009 (74 FR 13,432); and NOA regarding U.S. EPA comments published on May 29, 2009 (74 FR 25,736).

### **2.8.4 Public Hearings**

Two public hearings were held to receive public comment on the Draft Tier 1 EIS/EIR in August 2007. The August 6, 2007 public hearing was held in Yuba City, California and the August 8, 2007 public hearing was held in Roseville, California. Hearing transcripts are provided in Appendix B of this Final Tier 1 EIS/EIR, as is a copy of the PowerPoint presentation at the meetings.

Two public hearings were held to receive public comments on the Partially Revised Draft Tier 1 EIS/EIR in March 2009. The February 23 public hearing was held in Yuba City, California and the February 25 public hearing was held in Auburn, California. Hearing transcripts are provided in Appendix B of this Final Tier 1 EIS/EIR, as is a copy of the PowerPoint presentation at the meetings.

### **2.8.5 Permits and Approvals**

The Proposed Action is to identify and acquire a corridor; it does not require environmental permits because no physical construction would occur until after a Tier 2 environmental document is prepared and a roadway alignment within the corridor is determined. Applications for necessary permits, approvals, and agreements for construction of the Parkway will be prepared at the Tier 2 level of environmental review. As appropriate, information from this Tier 1 EIS/EIR may be used in the preparation of such applications.

## **2.9 AIR QUALITY CONFORMITY**

The proposed project is partially funded and is programmed in the SACOG Metropolitan Transportation Plan (MTP) 2035, which was found to conform by the SACOG Board on March 20, 2008, and FHWA and FTA adopted the air quality conformity finding on May 16, 2008.

## **2.10 SUMMARY OF MAJOR ENVIRONMENTAL IMPACTS**

Revised **Table ES-1** summarizes the potential environmental impacts of the No-Build Alternatives and the five build alternatives analyzed in this Final Tier 1 EIS/EIR. In Table ES-1, changes from the Draft Tier 1 EIS/EIR are shown as underlined (for additions) or as ~~strike-through~~ (for deletions).

The following substantial environmental effects cannot be avoided if the proposed project is implemented:

### **Land Use**

- land use conversion
- incompatibility with proposed land uses
- inconsistency with applicable General Plan policies

### **Farmland**

- farmland conversion
- Williamson Act conversion
- conflicts with agricultural plans or policies

### **Visual and Aesthetics**

- change in visual character and quality of the study area

### **Cultural Resources**

- potential substantial adverse change in the significance of a historic resource

### **Traffic and Transportation**

- addition of traffic on SR 70/99 (between I-5 and Elkhorn Boulevard), and on SR 65 (between I-80 and the SR 65 Lincoln Bypass), thereby lengthening the period of time during the peak period where these two freeways operate at LOS F conditions

### **Air Quality**

- construction emissions would exceed FRAQMD and PCAPCD thresholds for ROG, NO<sub>x</sub>, and PM<sub>10</sub>
- exceedance of FRAQMD operational emission thresholds for ROG and NO<sub>x</sub>
- exceedance of PCAPCD operational emission thresholds for NO<sub>x</sub>

### **Noise**

- exceedances of noise standards set by FHWA and Caltrans, and exceedances of noise thresholds as specified in the Sutter and Placer County General Plans

### **Biological Resources**

- potential to affect seven special-status species and their habitat: vernal pool fairy shrimp, vernal pool tadpole shrimp, Valley elderberry longhorn beetle, Swainson's hawk, white-tailed kite, giant garter snake, and Boggs Lake hedge hyssop
- potential loss of vernal pool species and their habitat

### **Growth**

- one of many factors that would encourage growth in and near the study area by extending and improving the regional transportation system

### **Cumulative Impacts**

Impacts related to the proposed project's cumulatively considerable contribution to (see Section 5.18):

- Land Use and Farmland – farmland conversion and Williamson Act conversion;
- Visual Resources – change in visual character and quality of the study area;
- Cultural Resources – potential adverse change in historic architectural resources;
- Traffic and Transportation



- Add traffic, in 2040, to SR 70/99 and thereby lengthen the period of time during the peak period where SR 70/99 would operate at LOS F conditions (from I-5 to the proposed Placer Parkway)
- Add traffic, in 2040, to SR 65 and thereby lengthen the period of time during the peak period where SR 70/99 would operate at LOS F conditions (between I-80 and Lincoln Bypass)
- LOS impacts on Sierra College Boulevard between the future Valley View Parkway and English Colony Way; on Valley View Parkway, and on Whitney Ranch Parkway between SR 65 and University Avenue
- Air Quality
  - Exceed FRAQMD significance thresholds for ROG and NO<sub>x</sub> during operation
  - Exceed PCAPCD significance thresholds for CO and NO<sub>x</sub>
  - Potential air toxic impacts (diesel particulates) could occur depending on the future roadway alignment within the selected corridor and the distance to existing/future sensitive receptors
- Noise – increased noise related to vicinity development and associated roadway systems
- Hydrology – the combined effects of floodplain encroachment, loss of pervious surfaces, increased rates of runoff, and increased flooding
- Water Quality – degradation of water quality when combined with upstream flow increases
- Biological Resources – habitat loss and fragmentation

All substantial environmental effects identified above would be “significant impacts” under CEQA. All other impacts of the proposed project would be “less than significant,” or “less than significant with mitigation incorporated” under CEQA. Minimization and mitigation strategies are identified in Chapter 4 of the Draft Tier 1 EIS/EIR and included in the Mitigation Monitoring and Reporting Program in Appendix D of this Final Tier 1 EIS/EIR.

Placer Parkway Corridor Preservation  
Final Tier 1 EIS/EIR

Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Land Use	Land Use Conversion	No impact	1,918.43 acres	1,836.78 acres	1,863.56 acres	1,627.64 acres	<b>1,623.47 acres</b>	Not analyzed**	Qualitative analysis only
	Potentially Bisected Parcels	No impact	<b>26</b>	28 <sup>‡</sup>	<b>26</b>	30	35 <sup>‡</sup>	Not analyzed**	Qualitative analysis only
	Compatibility with Proposed Land Uses	No impact	Depends on future land use approvals	Depends on future land use approvals	Depends on future land use approvals	Depends on future land use approvals	Depends on future land use approvals	Not analyzed**	Qualitative analysis only
	Conflict with General Plan Policies	No impact	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Not analyzed**	Quantitative analysis only
Socioeconomics	Number of Residential Communities Affected	No impact	1 <sup>‡</sup>	<b>0</b>	<b>0</b>	1	1	Not analyzed**	Qualitative analysis only
	Number of Homes, Farmsteads Affected	No impact	4	4	<b>3</b>	7	10	Not analyzed**	Qualitative analysis only
	Number of Employment Centers Affected	No impact	<b>1</b>	1	1	2	2	Not analyzed**	Qualitative analysis only
Farmlands	Prime Farmland	No impact	<u>68.5</u> 195.07acres	<u>68.5</u> 309.60acres	<u>68.62</u> 265.20acres	<u>38.44</u> <b>161.35acres</b>	<u>38.65</u> <sup>‡</sup> 168.09 acres	Not analyzed**	Qualitative analysis only
	Unique Farmland	No impact	<u>89.99</u> <b>167.87acres</b>	<u>419.11</u> 191.11acres	<u>421.54</u> 203.26acres	<u>433.98</u> 289.22acres	<u>530.82</u> 388.69acres	Not analyzed**	Qualitative analysis only
	Farmland of Statewide Importance	No impact	<u>435.75</u> 422acres	<u>466.70</u> 464.13acres	<u>464.01</u> 472.77acres	<u>302.23</u> <b>305.90acres</b>	<u>307.48</u> 319.01acres	Not analyzed**	Qualitative analysis only
	Farmland of Local Importance	No impact	<u>756.12 acres</u>	<u>592.79 acres</u>	<u>619.23 acres</u>	<u>569.44 acres</u>	<u>452.9 acres</u>	Not analyzed**	Qualitative analysis only

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

\* For the build alternatives, the greatest potential impact is shown in a shaded cell; the least potential impact is shown in **bold**. The greatest and least potential impacts are not identified for criteria resulting in identical impacts among all build alternatives.

\*\* A quantitative analysis for this resource was performed for existing conditions only (2004) in order to determine potential environmental impacts under Existing Plus Project conditions.

<sup>‡</sup> Shading added

<sup>‡</sup> Shading removed

**Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)**

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Farmlands (continued)	Grazing Land	No impact	<b>237.42 acres</b>	240.73 acres	240.77 acres	246.1 acres	248.5 acres	Not analyzed**	Qualitative analysis only
	Williamson Act Land Affected	No impact	<b>119.85 acres</b>	243.70 acres	240.56 acres	240.62 acres	240.26 acres	Not analyzed**	Qualitative analysis only
Public Service and Utilities	Municipal Facilities Affected	No impact	108.5 acres City of Roseville Retention Basin	109 acres City of Roseville Retention Basin	100 acres City of Roseville Retention Basin	100 acres City of Roseville Retention Basin	<b>96 acres</b> City of Roseville Retention Basin	Not analyzed**	Potential encroachment into future Western Regional Sanitary Landfill expansion area
Visual and Aesthetics	Potential Level of Impact from Build Alternative	No impact	Moderate/High	Moderate/High	Moderate/High	<b>Moderate</b>	<b>Moderate</b>	Not analyzed**	Qualitative analysis only
Cultural Resources	Archaeological Resources	No impact	No identified impact	No identified impact	No identified impact	No identified impact	No identified impact	Not analyzed**	Qualitative analysis only
	Built Environment Resources	No impact	1 property and 3 potential properties	1 property and 3 potential properties	1 property and 3 potential properties	<b>1 property</b>	<b>1 property</b>	Not analyzed**	Qualitative analysis only
	Paleontological Resources	No impact	High sensitivity	High sensitivity	High sensitivity	High sensitivity	High sensitivity	Not analyzed**	Qualitative analysis only
Traffic and Transportation	Vehicle Miles of Travel (VMT)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	<b>No-Build = 17,723,337</b> Alt 1 = 17,844,410 Alt 2 = 17,872,706 Alt 3 = 17,885,664 Alt 4 = 17,869,007 Alt 5 = 17,871,704‡	<b>No-Build = 25,977,539</b> Alt 1 = 26,419,100 Alt 2 = 26,472,170 Alt 3 = 26,482,608 Alt 4 = 26,476,869 Alt 5 = 26,455,500

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

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**Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)**

Potential Impact*		2004						2020	2040	
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)			
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.										
Traffic and Transportation (continued)	Level of Service Impacts	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	All Alternatives affect: • Portions of SR 70/99 • Portions of SR 65	All Alternatives affect: • Portions of SR 70/99 • Portions of SR 65 • Portions of Fiddymet Road • Portions of Sierra College Blvd • Portions of Valley View Parkway • Portions of Whitney Ranch Parkway	
	Vehicle Hours of Delay 3-hour a.m. and 3-hour p.m. Commute Periods	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	LOS D: No Build = 35,694 <b>Alternative 1 = 34,206</b> Alternative 2 = 34,272 Alternative 3 = 34,409 Alternative 4 = 34,501 Alternative 5 = 34,382	LOS D: No Build = 100,775 <b>Alternative 1 = 94,619</b> Alternative 2 = 95,077 Alternative 3 = 95,100 Alternative 4 = 95,493 Alternative 5 = 94,929
		Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	LOS E: No Build = 25,077 <b>Alternative 1 = 23,783</b> Alternative 2 = 23,880 Alternative 3 = 23,992 Alternative 4 = 24,077 Alternative 5 = 23,951	LOS E: No Build = 81,200 <b>Alternative 1 = 76,003</b> Alternative 2 = 76,450 Alternative 3 = 76,479 Alternative 4 = 76,885 Alternative 5 = 76,335
		Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	LOS F2 <sup>1</sup> No Build = 16,447 <b>Alternative 1 = 15,448</b> Alternative 2 = 15,530 Alternative 3 = 15,617 Alternative 4 = 15,739 Alternative 5 = 15,588	LOS F2 <sup>1</sup> No Build = 62,327 <b>Alternative 1 = 57,974</b> Alternative 2 = 58,463 Alternative 3 = 58,473 Alternative 4 = 58,885 Alternative 5 = 58,351

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

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**Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)**

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Air Quality	Construction Emissions – ROG, NO <sub>x</sub> , PM <sub>1</sub>	No impact	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	N/A	N/A
	Operational Emissions-reactive organic gases (ROG)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Alts 1-5 exceed FRAQMD significance thresholds	Alts 1-5 exceed FRAQMD significance thresholds Alts 1-5 <u>No exceedance</u> of PCAPCD significance thresholds
	Operational Emissions – carbon monoxide (CO)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Significance thresholds not exceeded	Alts 1-5 exceed PCAPCD <u>Significance thresholds not exceeded</u>
	Operational Emissions – nitrogen oxide (NO <sub>x</sub> )	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Alts 1, 2, 3, 4, and 5 exceed FRAQMD <u>and</u> PCAPCD significance thresholds	Alts 1-5 exceed FRAQMD significance thresholds Alts <u>1-5, 3, 4, and 5</u> exceed PCAPCD significance thresholds
	Operational Emissions – respirable particulate matter (PM <sub>10</sub> )	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Significance thresholds not exceeded	Significance thresholds not exceeded
	Operational Emissions – sulfur dioxide (SO <sub>x</sub> )	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Significance thresholds not exceeded	Significance thresholds not exceeded

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

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Placer Parkway Corridor Preservation  
Final Tier 1 EIS/EIR

Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Noise and Vibration	Noise at Residential Units Exceeding Threshold (66 dBA)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Alt 1 = 0 Alt 2 = 2 Alt 3 = 2 Alt 4 = 0 Alt 5 = 1	Alt 1 = 0 Alt 2 = 2 Alt 3 = 2 Alt 4 = 0 Alt 5 = 1
	Number of Roadways with projected increases in traffic noise > 12 dBA	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	No-Build = 1 Alt 1 = 1 Alt 2 = 1 Alt 3 = 1† Alt 5 = 1
Energy	Estimated Fuel Consumption	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	No-Build = 717,544 gallons Alt 1 = 722,445 gallons Alt 2 = 723,591 gallons Alt 3 = 724,115 gallons Alt 4 = 723,441 gallons Alt 5 = 723,550 gallons	No-Build = 1,051,722 gallons Alt 1 = 1,069,599 gallons Alt 2 = 1,071,747 gallons Alt 3 = 1,072,170 gallons Alt 4 = 1,071,938 gallons Alt 5 = 1,071,072 gallons
Hazardous Materials/Waste	Number of RECs potentially located within alignment	No impact	3	3	3	4	4	Not analyzed**	Qualitative analysis only
Hydrology and Floodplains	New Impervious Area	No impact	745 acres	737 acres	740 acres	624 acres	622 acres	Not analyzed**	Qualitative analysis only
	Stream/Canal Crossings	No impact	16	12	11	10	10	Not analyzed**	Qualitative analysis only
	Area Affected Within 100-Year Floodplain	No impact	269 acres	302 acres	317 acres	370 acres	372 acres	Not analyzed**	Qualitative analysis only

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

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**Revised Table ES-1**  
**Summary of Potential Impacts from the Placer Parkway Alternatives**  
**(Continued)**

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Geology – Soils, Seismic	Soils or Geology Affected; Seismic or Geologic Factors	No impact	No major potential impacts	No major potential impacts	No major potential impacts	No major potential impacts	No major potential impacts	Not analyzed**	Qualitative analysis only
Water Quality	Watersheds Traversed	No impact	5	5	5	<b>4</b>	<b>4</b>	Not analyzed**	Qualitative analysis only
Biology	Riparian Habitat	No impact	5.9 acres	12.3 acres	<b>4.8 acres</b>	<b>4.8 acres</b>	4.9 acres	Not analyzed**	Qualitative analysis only
	Potential Giant Garter Snake Habitat	No impact	340.8 acres	340.8 acres	340.8 acres	<b>268.2 acres</b>	<b>268.2 acres</b>	Not analyzed**	Qualitative analysis only
	Potential Swainson's Hawk/White-Tailed Kite Nesting Habitat	No impact	6.4 acres	7.9 acres	4.6 acres	<b>3.3 acres</b>	3.6 acres	Not analyzed**	Qualitative analysis only
	Potential Swainson's Hawk Foraging Habitat	No impact	1,024.0 acres	952.3 acres	989.0 acres	863.5 acres	<b>759.4 acres</b>	Not analyzed**	Qualitative analysis only
	Potential Valley Elderberry Longhorn Beetle Habitat	No impact	1.9 acres	1.3 acres	<b>1.2 acres</b>	<b>1.2 acres</b>	<b>1.2 acres</b>	Not analyzed**	Qualitative analysis only
	Wetlands	No impact	35.8 acres	30.9 acres	32 acres	28.3 acres	<b>28.0 acres</b>	Not analyzed**	Qualitative analysis only
	Vernal Pool Complexes	No impact	122.7 acres	124.1 acres	127.6 acres	<b>106.7 acres</b>	124.0 acres	Not analyzed**	Qualitative analysis only

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

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**Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)**

Potential Impact*	2004						2020	2040		
	No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)				
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.										
Growth Inducement	No impact	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Not analyzed**	Qualitative analysis only	
Section 4(f) Analysis	4(f) Resources in the study area	No impact	RD 1000	RD 1000	RD 1000	RD 1000	RD 1000	RD 1000	Not analyzed**	Qualitative analysis only

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

\* For the build alternatives, the greatest potential impact is shown in a shaded cell; the least potential impact is shown in **bold**. The greatest and least potential impacts are not identified for criteria resulting in identical impacts among all build alternatives.

\*\* A quantitative analysis for this resource was performed for existing conditions only (2004) in order to determine potential environmental impacts under Existing Plus Project conditions.

† Shading added

‡ Shading removed



**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~~.

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## 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.



**3.2 COMMENTS ON THE DRAFT TIER 1 EIS/EIR, AND RESPONSES (PAGES 1 THROUGH 200)**

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September 10, 2007

Ms. Celia McAdam  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, California 95603

RECEIVED

SEP 11 2007

P.C.T.P.A.

Re: Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/  
Program Environmental Impact Report ("EIS/EIR")

Dear Ms. McAdam:

These comments are submitted on behalf of the Placer Vineyards Development Group, LLC ("PVDG"). The members of the PVDG each own real property within the Placer Vineyards Specific Plan ("PVSP"). The PVSP area is located in unincorporated southwestern Placer County, bounded on the north by Base Line Road, on the south by the Sacramento/Placer County line, on the west by the Sutter/Placer County line and Pleasant Grove Road, and on the east by Dry Creek and Walerga Road. As approved by the Board of Supervisors in July 16, 2007, the PVSP contemplates the development of a mixed-use planned community, including 14,132 residential units, 274 acres of commercial uses, 919 acres of park and open space land, and 640 acres of public and quasi-public (i.e., public facilities/services, religious facilities, schools and major roadways) land uses.

In its analysis of cumulative traffic impacts, the PVSP EIR included the construction of Placer Parkway in its "Mitigated Transportation Network." (See PVSP Revised Draft EIR, pp. 4.7-60 to 4.7-61.) The PVDG believes the Placer Parkway is a vital improvement to the western Placer County transportation network, as recognized in the PVSP EIR:

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**B-001-001**

This comment is noted. The Placer Vineyards Specific Plan (PVSP) EIR identified Placer Parkway as an important part of the roadway improvements needed to mitigate traffic impacts of the PVSP on several major roadways in southwest Placer County and South Sutter County. As discussed in Chapter 1 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, Placer Parkway is intended to reduce anticipated traffic congestion on both the local and regional transportation systems in southwest Placer County and South Sutter County. Please see response to Comment F-004-022.

B-001-001

[Placer Parkway] would decrease traffic volumes on a number of existing and planned roadways in western Placer County, including Baseline Road, and numerous roadways in the City of Roseville. This regional facility would help mitigate traffic impacts of not only the proposed Placer Vineyards project but the traffic impacts from other proposed developments in western Placer County as well, and thus was considered a key improvement in the Mitigated Transportation Network.

(PVSP Revised Draft EIR, p. 4.7-61.)

The Placer Parkway Corridor Tier 1 EIS/EIR contains several factual errors and inconsistencies that require revision, as detailed below:

- B-001-002** • On page 1-30, the EIS/EIR states that “[t]he analysis showed that a maximum of 13,266 housing units could be built on vacant land in unincorporated Placer County that is suitable for residential development (Crawford, 2003). No commercial or industrial land use development was analyzed in the *Land Use Element*.” This text should be deleted, as it is inconsistent with the discussion of the PVSP on page 1-17, which provides that the PVSP would contain “about 14,100 dwelling units and about 500 acres of commercial/industrial uses.”
- B-001-003** • On page 1-17, the EIS/EIR states that “Placer County has been evaluating a development application for the proposed PVSP south of Baseline Road. . . . A Blueprint Alternative for the PVSP would contain over 21,000 dwelling units but about the same amount of commercial/industrial uses.” This text should be updated to reflect the Board of Supervisors’ approval of the PVSP on July 16, 2007. All references to the PVSP Blueprint Alternative should be deleted, since the Board of Supervisors approved the “Base Plan” (which provides for 14,132 residential units), rather than the Blueprint Alternative.
- B-001-004** • On page 1-33, the status of the PVSP should be updated to reflect the fact that the Placer County Board of Supervisors approved the plan on July 16, 2007.
- B-001-005** • On page 4.1-20, the PVSP should be moved to the list of “Approved Major Developments.”
- B-001-006** • In the discussion on pages 1-33 to 1-34, the EIS/EIR should make clear the assumed timing of build-out of major approved and proposed developments in western Placer County. Currently, the EIS/EIR does not make clear whether accurate building timing assumptions were relied upon in the impact analyses. The EIS/EIR should also be

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## B-001-002

The Draft 2002–2007 Placer County Housing Element notes that a maximum of 13,266 housing units could be build on vacant land in unincorporated Placer County that is suitable for residential development. The commenter notes that this number is not consistent with the PVSP, which states that the PVSP would contain about 14,100 dwelling units and about 500 acres of commercial/industrial uses. The commenter requests that the text in the Draft Tier 1 EIS/EIR be deleted because of this inconsistency. The text is an accurate quotation, representing the best available data at the time of the publication of the Draft Housing Element, and deletion is not required. The analysis in the Draft Tier 1 EIS/EIR assumes 14,132 dwelling units in the PVSP (please see Table 3-2 on page 3-7), which accounts for the rapidly changing development conditions in Placer County. The difference between the number used in the Draft Tier 1 EIS/EIR analysis and the analysis in the PVSP is 32 dwelling units, which would not change the conclusions reached in the Draft Tier 1 EIS/EIR.

The Draft Tier 1 EIS/EIR acknowledges the likelihood of such changes in Section 3.6.1, Evolving Existing Conditions, beginning on page 3-10. For this reason, and because including assumptions regarding proposed projects in the 2020 analysis would be somewhat speculative, they were not included. (The exception for Phase 1 of Placer Vineyards recognized its special planning status in the Placer County General Plan.) In hindsight, this approach has proven to be valid. For example, due to unforeseen circumstances including availability of credit, fall in housing prices, and a general downturn in the economy, some projects proposed in 2007 are either not currently proposed (Placer Ranch Specific Plan, Creekview Specific Plan) or have changed their characteristics (Sierra Vista Specific Plan). Planned and proposed development will be revisited and updated during the Tier 2 environmental process.

Ms. Celia McAdam  
September 10, 2007  
Page 3

B-001-006

consistent with the build-out timing assumptions relied upon in the PVSP EIR traffic analysis.

For all of the reasons stated above, the PVDG believes the Placer Parkway Corridor Tier 1 EIS/EIR requires revision. The PVDG appreciates PCTPA's thoughtful consideration of these comments.

Very truly yours,



Megan M. Quinn

cc: Kent MacDiarmid

{00019586.DOC; 1}

### B-001-003

The number of dwelling units in the PVSP was not approved until after the publication of the Draft Tier 1 EIS/EIR. The Draft Tier 1 EIS/EIR correctly described the potential number of residential dwelling units in the PVSP at the time of publication, and modification of this information is not required. The commenter notes that the number actually approved was 14,132 (the "Base Plan"), not more than 21,000 units (the "Blueprint Alternative"). Please see response to Comment B-001-002, which identifies that the difference in the number of residential dwelling units between the PVSP and the Draft Tier 1 EIS/EIR was 32 units, which would not change the analysis in the Draft Tier 1 EIS/EIR.

In response to several comments requesting that information regarding the PVSP be revised, the following paragraph is added at the end of page 1-17:

Subsequent to the publication of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, the Placer County Board of Supervisors approved the PVSP. On July 16, 2007, they approved the "Base Plan" rather than the "Blueprint Alternative."

### B-001-004

Please see response to Comment B-001-003.

### B-001-005

Subsequent to the publication of the Draft Tier 1 EIS/EIR, the PVSP was approved by the Board of Supervisors (July 2007). It is acknowledged that the PVSP is now an "Approved Major Development," rather than a "Proposed Major Development." This information does not change any of the conclusions in the Draft Tier 1 EIS/EIR and no changes to the Draft Tier 1 EIS/EIR are therefore necessary.

The Draft Tier 1 EIS/EIR acknowledges the likelihood of such changes in Section 3.6.1, Evolving Existing Conditions, beginning on page 3-10.

**B-001-006**

The traffic analyses in the Draft Tier 1 EIS/EIR uses two scenarios for build-out timing assumptions: an Opening Year Scenario (2020), and a Cumulative Development Scenario (2040). These are described in Section 3.4.1 of the Draft Tier 1 EIS/EIR. The 2040 scenario is based on the same “Super-Cumulative” development scenario that was developed for the evaluation of traffic impacts of the PVSP EIR. The Super-Cumulative Scenario was prepared through discussions with the staffs of Placer County and the cities of Roseville, Rocklin, and Lincoln and was developed to allow consistent evaluation of traffic impacts within pending EIRs for several major developments in west Placer County. These scenarios present assumptions for timing of build-out of major approved and proposed developments in western Placer and south Sutter counties, and were approved by the Placer Parkway Advisory Committees, which included all relevant jurisdictions, including Placer County. It is recognized that individual development proposals may have more detailed build-out assumptions; however, all such assumptions are based on market conditions and other factors. The Draft Tier 1 EIS/EIR acknowledges the likelihood of such changes in Section 3.6.1, Evolving Existing Conditions, beginning on page 3-10.

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September 4, 2007

07-1286

Ms. Celia McAdam  
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RECEIVED  
SEP 10 2007  
P.C.T.P.A.

**RE: Tier I Parkway EIR Comments**

Dear Ms. McAdam:

These comments are offered on behalf of the Placer Athens Limited Partners, LLC, the owners of approximately 300 acres west of Hwy. 65 in Placer County, APN 017-061-075. The comments are preliminary in nature, and may be revised or supplemented prior to the close of the public hearings on the draft EIR. This initial limited review focuses on the examination of traffic impacts, project alternatives, and land use.

I. Traffic Analysis

1. More supporting analysis is necessary to highlight the differences between No Build and the Parkway, and to place the significance of the differences in context. The traffic data reveals that there are major congestion problems with or without the Parkway, that the Parkway effects are mixed, and that the benefits of the Parkway are limited in scope. Given the complexity of the traffic setting and mixed results, the benefits of the Parkway, particularly in relation to cost, are far from clear cut. More analysis and discussion is necessary regarding the significance of Parkway effects.

For example, of the 110 segments analyzed in the 2020 material, there are only five segments where there is a difference in LOS between the No Build and with Parkway/Alt.1 conditions (there does not appear to be significance differences in the traffic effects of the various alignments). Of those five, one segment (SR 70/99 North of Elverta Road) goes from LOS D to E; one remains better than LOS C, and the remaining two (Sierra College Blvd. North of King Road and Sunset Blvd West of SR 65) go from LOS E to D, and F to E, respectively.

Excluding Hwy. 65, Hwy. 70, and I-80 (i.e. on local arterials), the 2020 LOS analysis shows 18 of the 93 remaining analyzed road segments operating at LOS D or worse under No Build Conditions. Of those 18, only three change with the construction of the Parkway (Alt. 1). All three changes are beneficial. The EIR notes that the Parkway improves the LOS generally, with the exception of noted major segments. How significant is the LOS improvement in this limited number of segments in relation to overall conditions in the area road system? How significant are the traffic improvements in relation to the noted major segments that are adversely affected by the Parkway? And finally, how significant are the majority of the segments where there is no major difference between No Build and the Parkway?

**B-002-001**

The discussion on pages 4.8-61, 4.8-70, 4.8-110, and 4.8-111 of the Placer Parkway Draft Tier 1 EIS/EIR places the difference in the traffic conditions between the No-Build Alternative and the build alternatives in context by noting the following:

- Placer Parkway would have an impact on travel patterns in a fairly wide area.
- While some roadway segments would increase in traffic volumes due to Placer Parkway, traffic volumes on a larger number of roadway segments would have decreases.
- In addition to measuring changes in traffic volumes and level of service (LOS) on a large number of individual roadway segments, the Draft Tier 1 EIS/EIR provides systemwide measures to show the impacts and benefits to the roadway system as a whole.
- Tables 4.8-21, 4.8-22, 4.8-38, and 4.8-39, which show the projected systemwide vehicle delay, indicate that Placer Parkway would significantly reduce vehicle hours of delay, especially in the Analysis Focus Area.

Systemwide estimates of vehicle-hours of delay (VHD) and vehicle miles travelled (VMT) by LOS category were included in the Draft Tier 1 EIS/EIR for each alternative to provide the reader with important summary measures of the benefits of Placer Parkway and to highlight the difference between the alternatives on the overall performance of the transportation system. No additional supporting analysis is necessary to highlight the differences between the alternatives.

**B-002-002**

The commenter focuses on differences between Alternative 1 and the No-Build Alternative and is referring to changes in LOS under 2020 conditions, which are presented in Table 4.8-12. This table shows that 20 (not 18) local roadway segments would be operating at LOS D or

B-002-002

In terms of 2020 VMT in the TSA, when No Build and Alternative 1 are compared, freeways operating at LOS F go from 39.2% to 36.6%. There is virtually no VMT percentage change between No Build and Parkway Alt. 1 on arterials. In the Analysis Focus Area, 2020 VMT by LOS Category, Freeways operating in LOS A-E goes from 60.2% to 66.3%. In the same category there is no significant increase in VMT on arterials. The same pattern is revealed in LOS Category F—i.e. beneficial freeway effects and limited effect on arterials. The hours of delay analysis appears to show a similar pattern of greater delay reduction on freeways than arterials, with roughly a 7% reduction on freeways and a 3% reduction on arterials. These beneficial VMT Parkway effects do not appear to be significant enough to take the Freeways (with the exception of a portion of SR 70/99) out of LOS F with or without the Parkway. How significant are the VMT changes with the Parkway given the resulting LOS conditions? How significant is the limited VMT changes on arterials given the goal of improving the overall road system?

B-002-003

Under long term 2040 cumulative conditions, the LOS analysis reveals that of the 110 analyzed road segments (excluding those that would operate at LOS C or better with or without the Parkway), there are 10 segments where there is a difference between No Build and Alt. 1—of the 10, six show improvement, and four show a worsening with the Parkway. Under 2040 conditions there is an improvement in the VMT and Delay with the Parkway over No Build. Again in the case of the 2020 analysis, an enhanced discussion of the significance of the VMT and Delay findings in relation to LOS is necessary.

Given the factual findings, how effective is the Parkway at accomplishing its stated objectives? Is there a pattern regarding particular roadways or types of roadways in terms of the effectiveness of the Parkway to ameliorate future conditions? Do any of these conclusions inform the consideration of alternatives?

B-002-004

3. In addition to an analysis of the segments that have changes between No Build and Parkway conditions, more discussion is necessary regarding the significance of the segments that show *no* change. Under 2020 conditions, Hwy. 65, SR 70/99(North of I-5), and all of the analyzed I-80 segments remain at LOS F with or without the Parkway. Under 2040 conditions SR 70/99 North of Elverta goes to LOS F, and otherwise LOS F conditions are the same as under the 2020 scenario. There are also a number of local segments that shown no change between Parkway and No Build conditions, and many of these segments would operate at level of service C or better under either condition. How effective is the Parkway in affecting future roadway conditions given the extent of the roadway segments that show no LOS difference between build and no build?

B-002-005

4. The VMT and Delay figures in the Analysis Focus Area show much greater relative improvement than the same analysis for the TSA as a whole. The LOS analysis does not break out the Analysis Focus Area. It would be helpful to isolate the LOS data on the segments within the Analysis Focus Area and discuss the significance of the VMT and Delay changes in relation to LOS. This would provide a better idea of the significance of the benefits in the area where the Parkway appears to have the greatest effect.

B-002-006

5. There is no analysis of the extent to which future traffic impacts on state highways and I-80 are generated by increases in traffic volume with an origin or destination outside the TSA and outside the Analysis Focus Area. Thus, it is difficult to ascertain the degree to which future traffic conditions are sensitive to development activity within the TSA or Focus Area. Additional factual and narrative analysis would also be helpful on the question of the degree to which existing

worse under the No-Build Alternative. It indicates that the LOS would improve by one LOS category on four of those congested roadway segments under all of the build alternatives. The LOS would improve by one LOS category on two other congested roadway segments under some of the build alternatives.

It should be noted that each LOS category has a range of operations, as described in Table 4.8-2. As shown on Figures 4.8-5 through 4.8-9, the build alternatives would reduce traffic volumes on a number of local roadway segments in 2020. While the LOS on a particular roadway segment may not improve from one LOS category to the next category, the volume/capacity ratio and thus delay on that segment may be reduced. To adequately show how the build alternatives would affect traffic operations, the volume/capacity ratio and vehicle-hours of delay information provided in the Draft Tier 1 EIS/EIR should be reviewed.

Table 4.8-11 shows that of the 20 roadway segments that would operate at LOS D or worse under the No-Build Alternative, 14 would have a lower volume/capacity ratio under all, or nearly all, of the build alternatives.

As noted in the response to Comment B-002-001, systemwide estimates of vehicle-hours of delay were included in the Draft Tier 1 EIS/EIR for each alternative to provide the reader with an important summary measure of the benefits of Placer Parkway and to highlight the difference among the alternatives on the overall performance of the transportation system. The systemwide delay measure does not just account for the number of segments where delay is reduced or increased but also the volume on each segment. Tables 4.8-21 and 4.8-22, which show the projected systemwide vehicle delay in 2020, indicate that Placer Parkway would significantly reduce vehicle hours of delay, especially in the Analysis Focus Area (AFA).



**B-002-006** deficiencies in the roadway system are contributing to 2020 and 2040 conditions. For example, there are a number of roadway segments that are currently operating at LOS conditions that generally do not meet agency standards. These segments are identified in the EIR. Various improvements to the roadway system are assumed as part of the Parkway analysis, and also identified as Parkway mitigations. To what degree do the assumed non-Parkway improvements adequately address existing deficiencies? Of all the assumed and recommended non-Parkway improvements, which are critical to the success of the Parkway, and what is the commitment status of the local, state, and federal agencies to these future non-Parkway improvements? May it be assumed that the recommended Parkway EIR mitigations are critical, and to what degree are these improvements embodied in an approved CIP or MTP?

**B-002-007** 6. As noted below, LOS, VMT, and Delay data, with a more detailed narrative analysis, should be available on the Project Alternatives so that they may be compared to the Project and No Build scenarios.

**B-002-008** 7. The EIR notes that the development that would occur in certain pending or anticipated specific plans, including Placer Ranch, have not been included in the 2020 traffic demand analysis. Per the discussion below on fiscal matters, a substantial portion (all?) of the Parkway funding is to come through the payment of fees by developments requiring specific plans, general plan amendments, rezoning, or that voluntarily participate in development agreements. We have been informed that approximately 150,000 future households are projected in these categories, and will pay the Parkway fee. It is not clear the degree to which the categories of development that are intended to pay for the Parkway have been included in the demand analysis. Perhaps all this development is reflected in the 2040 traffic projections? Certain of the presently excluded specific plans are likely to experience development before 2020. If certain new specific plan developments will actually occur prior to 2020, and are being expected to pay for the Parkway, should not their traffic demand be modeled in the 2020 projections?

## II. Project Alternatives.

**B-002-009** 1. The traffic impacts of the route alternatives are thoroughly documented in the main body of the EIR. However, the TSM, TSM Plus Shorter Parkway, and Shorter Parkway alternatives analysis are handled in summary fashion in the Alternatives material. The actual numerical data upon which the Alternatives conclusions are based—e.g. a table comparing the Travel Miles, Delay, and LOS under 2020/2040 conditions for the No Build, Parkway (Any Alignment Alternative), TSM, TSM Plus Shorter Parkway, and Shorter Parkway, should be provided, perhaps in a supplemental appendix. Without the data it is not possible to compare the extent to which the Project represents an improvement over the alternatives.

**B-002-010** 2. The 2020 and 2040 scenarios assume substantial non-Parkway improvements to the road system. Additional substantial improvements are recommended as further mitigation for post Parkway conditions. In terms of future LOS conditions, the EIR reveals that there are limited differences between the Parkway and No Build Condition. Is there an additional Alternative that would consist of a coherent package of planned and additional selected roadway improvements coupled with the TSM that could more specifically target the critical roadway segments that the LOS analysis reveals are problems, i.e. would accomplish the objectives of the Parkway in a more focused and cost effective manner. For example, would it be more effective to redirect freeway funds that would have been expended on the Parkway to construct the recommended further improvement of

It should also be noted that the Draft Tier 1 EIS/EIR analysis indicates that the build alternatives would have a greater overall reduction in systemwide vehicle delay in 2040 than in 2020 due to higher levels of congestion under the No-Build Alternative by 2040 (please see response to Comment B-002-003).

### **B-002-003**

The commenter is referring to changes in LOS, presumably from Table 4.8-29, and focuses only on differences between Alternative 1 and the No-Build Alternative and presumably includes only local roadways. This table indicates that, excluding roadway segments that would operate at LOS C or better under the No-Build Alternative and Alternative 1, 13 (not 10) local roadways would change by at least one LOS category and 3 would have a worse LOS with Alternative 1.

As noted in the responses to Comment B-002-002, each LOS category has a range of operations. While the LOS on a particular roadway segment may not improve from one LOS category to the next category, the volume/capacity ratio and delay on that segment may be reduced. As shown on Figures 4.8-11 through 4.8-15, the build alternatives would reduce traffic volumes on a large number of local roadway segments in 2040. Table 4.8-28 shows that of the 51 roadway segments that would operate at LOS D or worse under the No-Build Alternative, 36 would have a lower volume/capacity ratio under Alternative 1, 10 would have a higher volume/capacity ratio under Alternative 1 and the remaining 5 would not change. The other build alternatives show similar numbers.

As noted in the responses to Comments B-002-001 and B-002-002, systemwide estimates of vehicle-hours of delay were included in the Draft Tier 1 EIS/EIR for each alternative to provide the reader with a summary measure of the benefits of Placer Parkway and to highlight the difference among the alternatives on the overall performance of the transportation system. The systemwide delay measure does not just

**B-002-010** Hwy. 65, SR70/99, and I-80, perhaps coupled with TSM and a more energetic funding of arterial improvements? Should this type of an alternative be augmented by a much enhanced role for public transit?

**B-002-011** 3. Is there a viable alternative consisting of freeway improvements at the eastern and western terminus of the Parkway with a less than freeway connector that would accommodate the through component? As a related matter, can and should the Parkway be phased, for example, to construct eastern and western segments as the development of these areas proceeds with a subsequent construction of the connecting link, or some other phasing approach.

**B-002-013** 4. It is difficult to pull the key differences in traffic impacts/benefits associated with the TSM, TSM Plus Shorter Parkway, Shorter Parkway, Parkway, and No Build from the separate narrative discussion on each of these alternatives. It would be helpful to have a summary narrative of essential comparative traffic conclusions supported by a summary table and graphic, something that would highlight the key differences side by side. As stated above there should be additional data support for the consideration of alternatives.

**B-002-014** 5. There is limited supporting analysis for why the full Parkway has been selected as the preferred alternative, and why avoidance alternatives were not selected. The traffic data and additional narrative suggested above could provide a more complete factual basis for why the preferred alternative of a full Parkway was selected. However, there is a significant missing component of a true consideration of alternatives, namely the cost and fiscal impacts of the various alternatives. Based on a quick review of the Parkway project library on-line materials, we have been unable to locate a comparative fiscal—cost/benefit analysis of Parkway alternatives that would be an important part of the framework of making a project decision. If this material has been previously produced it should be referenced in the EIR and used the alternatives analysis. It would appear that the certification of the EIR will require over-riding findings of socio-economic justification. The fiscal impacts of the preferred Project and the cost-effectiveness of the alternatives, including the No Build Alternative, could be an important part of providing that justification.

**B-002-015** 6. Various Parkway related studies have been previously conducted by SPARTA and SACOG. It would be useful for the Alternatives Analysis to reference, not just the various alignments and configurations that have been previously analyzed, but the nature of any project avoidance type alternatives that were previously considered (including any formal environmental review), particularly in the Metropolitan Transportation Plan context.

**B-002-016** 7. The Alternatives Analysis references the “No Development Buffer Concept.” The stated purposes of the “Buffer” include: “preserving open space, preserving biological resources, limiting development along the Parkway, and constraining “unplanned” Parkway interchanges and growth inducement. There is also a suggestion that the limitation of growth by preventing development in the buffer would reduce future traffic demand.

**B-002-017** The bulk of the Parkway corridor is designated and zoned for agriculture; however, there are significant segments of high intensity commercial/industrial. The agricultural zoning itself is the primary open space protection mechanism, not a limited strip of undeveloped land. There are no land use conflicts between freeway and agricultural land, nor does the proximity of high intensity commercial/industrial uses create land use conflicts. Both uses commonly co-exist with freeways without expansive buffers. Biological resources are protected through various regulatory processes.

account for the number of segments where delay is reduced but also the volume on each segment. Tables 4.8-38 and 4.8-39, which show the projected systemwide vehicle delay in 2040, indicate that Placer Parkway would substantially reduce vehicle hours of delay (on the order of 20 percent), especially in the AFA.

#### **B-002-004**

The commenter is referring to changes in LOS. As discussed in response to Comments B-002-002 and B-002-003, each LOS category has a range of operations. While the LOS on a particular roadway segment may not change from one LOS category to the next category, the volume/capacity ratio and delay on that segment may change. The volume/capacity ratio and vehicle-hours of delay information provided in the Draft Tier 1 EIS/EIR show how the build alternatives would affect traffic operations. This information is summarized below.

Placer Parkway would have an impact on travel patterns in a fairly wide area. As shown in the Draft Tier 1 EIS/EIR, some roadway segments would increase in volume/capacity ratio due to Placer Parkway, but the volume/capacity ratio on a larger number of roadway segments would decrease. On some roadway segments in the Traffic Analysis Study Area (TASA), the build alternatives would result in little or no change in the volume/capacity ratio.

Systemwide estimates of vehicle-hours of delay were included in the Draft Tier 1 EIS/EIR for each alternative to provide the reader with an important summary measure of the benefits of Placer Parkway and to highlight the difference between the alternatives on the overall performance of the transportation system. Tables 4.8-21, 4.8-22, 4.8-38 and 4.8-39, which show the projected systemwide vehicle delay, indicate that Placer Parkway would significantly reduce vehicle hours of delay, especially in the AFA.

**B-002-017** To the extent acquisition is necessary, important biological sites should be selectively acquired, far more cost effective than acquiring a continuous buffer strip along the entire length of the freeway. The buffer has no utility to prevent future interchanges, nor is a strip of land effective to prevent future zoning changes—both the interchanges and rezoning are at the primary discretion of local agencies. The existence of a buffer is not an impediment if an agency wants an interchange or wishes to rezone the area. Finally, the buffer is expensive. The alternatives analysis does not contain information regarding the additional costs incurred to provide the buffer. The logic of spending a lot of money to ineffectively tie the hands of the very agencies that are approving the project is questionable. There is no factual support offered for the suggestion that the absence of development in the buffer would significantly reduce future traffic demand, and this logic would not apply on the lands that are to remain in agriculture.

**B-002-018** It is questionable whether the buffer is needed for aesthetic purposes in areas that are planned to remain in agricultural use. The question remains of whether the acquisition of buffer in high intensity commercial/industrial areas, where the land will be expensive, produces enough of a positive aesthetic effect by creating a “Parkway” atmosphere to justify the cost. There is also a question of whether the aesthetic effects of a “Parkway” atmosphere can be achieved through expanded treatment of the median and a modestly expanded right of way.

**B-002-019** The discussion offered does not justify the buffer as mitigation for the Parkway itself, and there is insufficient information on cost and effectiveness to justify including the buffer as an aesthetic amenity.

### III. Land Use

**B-002-020** Placer County has land use policies that promote industrial development and job generation. An expansive no development buffer through the Sunset Industrial Park is inconsistent with these objectives. The core Parkway right of way already results in a significant loss of land devoted to high intensity use.

### IV. Fiscal and Cost/Benefit Issues

**B-002-021** A fiscal analysis is frequently included in environmental review material, or concurrently conducted. As a decision making tool, the Parkway DEIR suffers from lack of analysis of the relative fiscal pros and cons of the project alternatives and the viability of the financing scheme for the Parkway. Based on conversations with County and SPARTA staff, most, if not all, of the Parkway construction (4 lanes) is to be funded by development fees in a zone of benefit; and further, the fees are to be generated only by projects that require general plan amendments, rezoning, specific plans, and/or that voluntarily participate in development agreements. Likewise based on staff input, no contribution to the Parkway is contemplated by new development that does not fall within the above mentioned categories, nor is state and federal funding anticipated. The viability of this financing scheme needs to be evaluated, including the legal and policy nexus/fair share framework.

In the absence of any proposed state or federal funding, the entire burden of the benefits to state and federal highways rests upon a class of area landowners. This is a major nexus consideration. There is no factual analysis of the extent to which future traffic demands will be generated from sources that are not subject to the fee. Nexus and fair share principles include the propositions that landowners should not be responsible for the cost of correcting existing deficiencies

### **B-002-005**

The boundary of the TASA was based on an evaluation of the changes in traffic volumes. It covers the area where the travel model shows substantial (“significant” under the California Environmental Quality Act) changes in traffic volumes, although the percentage of roadways that would be affected by Placer Parkway decreases on the fringes of that area. As shown in Figure 4.8-2, the AFA is a subarea of the TASA. As noted on pages 4.8-61 and 4.8-111, the AFA is close to the build alternatives and thus represents the area where most of the transportation benefits of constructing Placer Parkway would occur.

The AFA was defined to provide only systemwide analysis measures, including VMT and delay. The systemwide measures of VMT and delay provide the best summary information on the impacts and benefits of the build alternatives on the AFA.

### **B-002-006**

The commenter appears to be requesting an analysis of the origins and destinations of the traffic using all of the state highways in the TASA. The analysis in the Draft Tier 1 EIS/EIR shows that local roadways in the AFA would benefit the most, in terms of reductions in overall delay, from the build alternatives. The state highway system, especially an interstate freeway such as Interstate 80 (I-80), inherently serves traffic from a very large area, including regional and inter-regional travel. While a significant portion of the growth in traffic on the state highways within the TASA would stem from growth within the TASA, the principle purpose for the Parkway is not to reduce traffic on I-80, but to reduce congestion on the local and regional system serving South Sutter County and southwest Placer County. Providing origin and destination information on the state highway system in the TASA, including I-80, does not appear to be warranted.

The Draft Tier 1 EIS/EIR provides factual and narrative analysis of


**B-002-021**

in the roadway system, nor should they pay to ameliorate the traffic impacts of others who are not contributing to the improvements. We have been informed that all the available state and federal funding during the pre-Parkway construction period (2020?) has been allocated to the Lincoln Bypass and I-80 improvements. If so, such a funding allocation is a transportation policy decision with nexus implications. It is not clear what level of state and federal funding is contemplated for the roadway improvements assumed and recommended as mitigations in the EIR. Perhaps there is a nexus rationale for why such other non-Parkway project funding should be considered when examining the fair share responsibilities for Parkway construction.

Parkway financing, existing and planned local agency traffic fees, the various JPA fees that are intended to fund selected interchanges, and the potentially substantial new fees recommended in the EIR to fund Parkway mitigations should be cumulatively evaluated to consider the total transportation financing burden in relation to land value. This type of analysis is frequently done when considering major infrastructure financing with much lower dollar levels than involved in this instance. The cumulative burden of this financing may significantly and adversely affect other land use policies, for example, industrial development and job creation, or affect the viability of the Parkway itself.

It may very well be that the present strategy would be reaffirmed with more fiscal and cost/benefit information in hand. It is also possible that a far less than perfect solution may be advisable. However, to make a good project decision, more fiscal and nexus analysis is essential, and cost in relation to the actual traffic benefits of the project should be clearly understood.

Sincerely,  
Law Offices of Jeffrey F. Bordelon

  
Jeffrey F. Bordelon  
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existing deficiencies, including existing levels of service on major roadways in the TASA (Table 4.8-3) and a listing of roadways that do not currently meet LOS standards (please see page 4.8-9). Improvements, other than Placer Parkway, are planned for many of those roadways in the Metropolitan Transportation Plan (MTP). The future transportation system assumed for the Draft Tier 1 EIS/EIR analysis is discussed on pages 4.8-17 through 4.8-25, which clearly indicates that both the 2020 and 2040 No-Build roadway systems were based on the MTP adopted by the Sacramento Area Council of Governments (SACOG). The MTP generally includes all of the roadway improvements from local jurisdictions' Capital Improvement Programs (CIP). Therefore, the mitigation measures for the build alternatives in the Draft Tier 1 EIS/EIR are improvements beyond those included in an approved CIP and MTP.

**B-002-007**

The Draft Tier 1 EIS/EIR provides detailed volume, volume/capacity, LOS, VMT, and delay data within the TASA so that the No-Build Alternative can be compared to each of the build alternatives. The document provides estimates of the volume/capacity ratio and LOS for 110 roadway segments in the TASA and compares the result for each build alternative to the No-Build Alternative. This information is used to identify LOS impacts for each build alternative and identifies mitigation strategies for each impact.

**B-002-008**

The development projections used in the analysis are discussed in Section 3.4.1 of the Draft Tier 1 EIS/EIR. Based on discussions with the project's Technical Advisory Committee (TAC), the transportation analysis of build alternatives was conducted for the following two future development scenarios:

- A 2020 "Opening Year" scenario reflecting 2020 development levels based on current general plans.

- A Cumulative (2040) Development Scenario. This scenario goes beyond SACOG's 2025 development levels to include foreseeable development based on input from local jurisdictions and SACOG's Preferred Blueprint Scenario.

The Placer Parkway Project Development Team (PDT) concluded that these two scenarios would “bracket” regional development levels from a low (2020) level to a high (2040) level. The exact pace and location of development is unknown. Use of the two scenarios allows the Tier 1 EIS/EIR to evaluate impacts for a range of reasonably foreseeable development levels. Please also see response to Comment B-001-002.

**B-002-009**

As discussed in Sections 2.4 and 2.5, a number of alternatives were considered, evaluated and rejected in early phases of the project development – including the Transportation Systems Management (TSM), Shorter Parkway and Shorter Parkway Plus TSM alternatives. Section 2.5.4 discusses how these three “avoidance alternatives” were defined with the U.S. Army Corps of Engineers (USCOE) and the U.S. Environmental Protection Agency (U.S. EPA) under a modified National Environmental Policy Act (NEPA)/404 process and were evaluated, based on screening criteria approved during that process. In cooperation with the USCOE and U.S. EPA, as part of the modified NEPA/404 process, those alternatives were eliminated in that process from further consideration on the basis that they did not meet the project Purpose and Need and were not further analyzed with the build alternatives.

The Draft Tier 1 EIS/EIR does present information on VMT, VHD, and LOS for the TSM alternative and compares this alternative to the No-Build Alternative and the Parkway.

Additional details, including quantitative analysis, of avoidance

alternatives described in Section 2.5 of the Draft Tier 1 EIS/EIR are provided in several technical reports incorporated by reference into the Tier 1 document and are listed in Section 10.2. These documents are available at Placer County Transportation Planning Agency (PCTPA), 299 Nevada Street, Auburn, California.

**B-002-010**

The analysis in the Draft Tier 1 EIS/EIR indicates that most of the traffic that would use the proposed Placer Parkway would not be diverted from State Route (SR) 65, SR 70/99, and I-80, but would come from congested local roadways. Therefore, further improvements to those state highways, while warranted, would not significantly change the travel demand on most local roadways in the AFA, and thus would not meet the project Purpose and Need. The analysis indicates that Placer Parkway would reduce traffic volumes on a large number of local roadway segments. In Section 2.5.4 of the Draft Tier 1 EIS/EIR, a TSM Alternative was analyzed. It included all of the transportation elements for the No-Build Alternative described on pages 4.8-18 through 4.8-25, and the additional elements identified in Table 2-1 on page 2-30, which included a substantial amount of new transit service in the AFA. Such an alternative would not meet the project Purpose and Need. Please see Master Response 2, which provides information regarding PCTPA transit planning activities.

**B-002-011**

During the development of alternatives under the modified NEPA/404 process described in Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR, shorter versions of a freeway were considered. The “Shorter Parkway” Alternative involved a freeway improvement along the eastern portion of Placer Parkway, diverting traffic around Roseville.

As discussed in Section 2.5.4 of the Draft Tier 1 EIS/EIR, this concept

would substantially increase traffic volumes on Baseline Road and Riego Road west of the terminus of the Parkway. The volume of projected traffic could not be handled by a six-lane expressway, and would result in LOS F along Riego Road for 4 to 6 hours per day. To provide (1) an acceptable LOS (LOS C/D) and travel time; (2) access to the Placer Vineyards development; and (3) to accommodate short- to medium-distance trips, substantial new transportation capacity would need to be constructed. The extent of the necessary capacity increase would require a freeway facility plus a parallel frontage road. For these reasons, the Shorter Parkway Alternative was eliminated from further consideration. It is unlikely that upgrading Baseline/Riego Road to a freeway plus construction of a parallel frontage road to accommodate more local traffic would be feasible, given probable costs and existing development along or near Baseline/Riego Road.

**B-002-012**

The Parkway could be phased as the commenter suggests, that is, constructing Eastern and Western segments as the development of these areas proceeds. This would be evaluated during Tier 2 environmental review, which could consist of the entire roadway from SR 70/99 to SR 65, or could consist of segments. The number of lanes could also be phased. If the project is phased, the components being phased must have logical beginning and ending points related to a transportation purpose, called “logical termini.”

According to the Federal Highway Administration, “Logical termini for project development are defined as (1) rational end points for a transportation improvement, and (2) rational end points for a review of the environmental impacts. The environmental impact review frequently covers a broader geographic area than the strict limits of the transportation improvements... the most common termini have been points of major traffic generation, especially intersecting roadways. This is due to the fact that in most cases traffic generators determine the size

and type of facility being proposed...Construction may then be "staged," or programmed for shorter sections or discrete construction elements as funding permits" (FHWA, 1993). Therefore, as currently proposed, a phase could, for example, include a segment from Fiddymont Road to SR 65, but could not include a segment from the SR 70/99 to the Sutter County/Placer County line. The particular phasing (if phasing is considered) would be determined during the Tier 2 environmental process.

**B-002-013**

As described in Sections 2.4 and 2.5 of the Draft Tier 1 EIS/EIR, the project team worked together with the USCOE and the U.S. EPA under a modified NEPA/404 process to identify feasible "avoidance alternatives" that would meet the Purpose and Need of the project. The identification and analysis of the avoidance alternatives took place over a period of more than a year. During that period, a variety of measures were used to show the benefits and impacts of the various alternatives. Common measures included traffic volumes and LOS on key roadway segments and travel times between selected locations. However, system-level benefits were measured using the amount of vehicle miles of travel at LOS F conditions for some alternatives and the amount of vehicle-hours of delay for other alternatives.

As discussed in Section 2.5.4, the analysis concluded that the TSM, Shorter Parkway, and Shorter Parkway Plus TSM alternatives would not meet the Purpose and Need of the project because they would not reduce congestion and delay on the local roadway system. This is illustrated in the table titled response to Comment B-002-013 at the end of the responses to this Comment Letter. Baseline Road and Riego Road would be heavily congested under the No-Build Alternative. This congestion would cause traffic to divert to other longer but less-congested routes.



- The TSM Alternative would result in a marginal change in the level of service along Baseline Road and Riego Road.
- The Shorter Parkway and Shorter Parkway Plus TSM alternatives would cause the level of service on Baseline Road and Riego Road to actually get worse.
- Placer Parkway provides an uncongested (LOS B conditions) alternative route to Baseline Road and Riego Road, which would result in traffic reductions on several parallel routes.

The avoidance alternatives would therefore not reduce congestion on the local roadway system. They would also not meet another element of the project purpose, which is to improve travel times between the SR 65 corridor and SR 70/99 by maintaining a travel speed at or near the free flow speed of the Parkway, which on a freeway reflects LOS C to D conditions. Travel speeds on Placer Parkway can meet that objective, while speeds along Baseline Road and Riego Road would be very slow under the TSM, Shorter Parkway, and Shorter Parkway Plus TSM alternatives.

Please see Table 1 in the attachment following responses to this Comment Letter.

**B-002-014**

In Section 2.5.4 of the Draft Tier 1 EIS/EIR, three avoidance alternatives are discussed. The discussion clearly identifies why each avoidance alternative was not selected for further analysis.

The avoidance alternatives were eliminated either because they would not meet the project's Purpose and Need or because they would require substantial additional facilities resulting in substantial land to be converted to freeways or frontage roads, and add new interchanges. They were not eliminated due to fiscal considerations, and no fiscal analysis is necessary. Findings and/or statements of overriding

considerations for the Parkway under the California Environmental Quality Act do not rely solely on fiscal considerations.

**B-002-015**

The Draft Tier 1 EIS/EIR referenced the appropriate planning documents for the context in which the project is being proposed. The Metropolitan Transportation Plan did not specifically analyze alternatives to Placer Parkway while holding other components of the Plan constant; therefore, this Plan and its environmental review were not referenced with respect to avoidance alternatives.

The project study area was informed in part by a focus on identifying ways to avoid or reduce impacts to environmental resources and existing development. While these efforts have not undergone formal environmental review, input was received from various public and private entities, as described on page 2-21 of the Draft Tier 1 EIS/EIR.

**B-002-016**

The purpose of the no-development buffer is outlined in Section 2.2.4.1 on page 2-9 of the Draft Tier 1 EIS/EIR. The no-development buffer is intended to achieve the objectives described by the commenter. The buffer is also intended to limit opportunities for growth inducement (please see Section 2.2.4.1) in areas not planned for growth. The Draft Tier 1 EIS/EIR does not suggest that preventing development in the buffer will limit traffic demand in other parts of the study area, but rather that control of the land within the buffer will allow the restriction of access to the Parkway by controlling the number and location of future interchanges. Limiting the construction of unplanned interchanges will ensure that the Parkway remains a free-flowing high-speed facility and will constrain unplanned growth that would be expected to occur in the vicinity of such interchanges. Additional details on the no-development buffer are provided in Master Response 1.

**B-002-017**

Open space and biological resources in the project area are subject to a variety of regulatory programs, including those discussed in the Draft Tier 1 EIS/EIR (please see, e.g., Sections 4.6.1 and 4.14.1). The purpose of the no-development buffer, included as part of the Parkway project, is not to mitigate impacts of the project on open space, biological, or other resources. The buffer does, however, contribute to reduction or avoidance of land use conflicts. The buffer, including the relationship to interchanges and traffic demand, is discussed in Master Response 1.

**B-002-018**

The acquisition of land to create the no-development buffer is an essential component of the Parkway project (please see Section 2.2.4 of the Draft Tier 1 EIS/EIR). The primary objectives of the buffer are to preserve natural resources and open space around the Parkway, including prevention of conversion of agricultural land to unplanned development uses, and to control access to the Parkway in order to maintain a high-speed, free-flowing facility and limit the potential for unplanned growth through controlling the land required for future additional interchanges. The preservation of a buffer will also provide additional benefits, such as opportunities to enhance the visual qualities of the Parkway through the continuation of agricultural activities, installation of landscaping and preservation of open space. Landscaping will be carefully planned to respect the surrounding topography and landscape character and to buffer the Parkway from future adjacent land uses that are incompatible with a parkway concept.

The Draft Tier 1 EIS/EIR does acknowledge that, since the value of the no-development buffer zones to maintain the parkway concept and limit access depends to some extent on the adjacent land uses, 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 (please see page 2-9). Additional details on the no-development buffer are provided in Master Response 1.

**B-002-019**

The no-development buffer is not intended to provide mitigation for any adverse environmental impacts that could be associated with the Parkway. In fulfilling its primary functions of environmental resource and open space preservation and limitation of access and unplanned growth, the buffer does offer some additional benefits that will lessen its visual impacts. Please also see response to Comments B-002-017 and B-002-018.

**B-002-020**

The Placer Parkway project, including the no-development buffer, as described in the Draft Tier 1 EIS/EIR, was developed with extensive cooperation and input from Placer County. This is described further in Section 2.4 of the Draft Tier 1 EIS/EIR. The Placer County General Plan provides for preservation of right-of-way for the Parkway (please see Section 4.1.1.1 of the Draft Tier 1 EIS/EIR), but does not specifically address the width of the right-of-way or the no-development buffer. Please see response to Comment L-010-001, which specifically addresses potential flexibility of the buffer in areas undergoing urban development.

By nature, a general plan must balance the competing interests of preservation and protection of the natural/human environment with the accommodation of growth within its boundaries. Placer County's General Plan policies are intended to guide a project's development

within the Plan's framework, as defined by the goals, objectives, and land use designations for the project area, and are sufficiently broad to guide preservation efforts through the full range of development intensities, and uses. They intentionally provide decision-makers with flexibility for evaluating a project's design in the context of a particular location.

**B-002-021**

The fiscal pros and cons of the alternatives are fairly basic—the longer the Parkway and the greater the number of interchanges, the more costly the facility.

New growth from major projects anticipated in south Placer County will require additional transportation infrastructure. In anticipation, the cities of Lincoln, Roseville, and Rocklin, and the County of Placer each adopted a Memorandum of Agreement (MOA) effective May 27, 2009 to impose a Tier II Development Fee Program to fund the Placer Parkway and SR 65/I-80 interchange improvements. The Tier II fee, which ranges from \$1,000 to \$5,473 per development unit equivalent (DUE) with annual inflationary adjustments, is to be imposed by the local jurisdictions on new development in the southwestern portion of Placer County as specified in the MOA via development agreements. The fee levels were developed based on a nexus analysis of transportation impacts of the new growth areas.

Moreover, under the terms of the Tier II MOA, developers that construct a portion of the Parkway can receive credit and/or compensation. The MOA also provides for the local jurisdictions to require the dedication of land for the Placer Parkway right-of-way where the Placer Parkway is programmed within new development in the Tier II fee area, with no credit or compensation.

The Tier II Developer Impact Fee program, along with a proportional

contribution from Sutter County, will contribute \$475 million toward a four-lane Placer Parkway facility. However, the existing development is expected to generate the need for two additional lanes, for a total six-lane facility. The additional two lanes will be paid through other sources, such as future state or federal funding, or through another local source, such as a transportation sales tax.

Sutter County will be responsible for approximately \$100 million toward funding of the Parkway. They expect to obtain these funds through development of the Sutter Pointe Specific Plan, which would impose fees of approximately \$4,000 per dwelling unit in that development.

## Response to Comment B-002-013

**Table 1  
Levels of Service for Avoidance Alternatives  
On Selected Roadways**

Alternative	Level of Service		
	Baseline Road (Watt Avenue to Sutter County Line)	Riego Road (SR 70/99 to Placer County Line)	Placer Parkway (Fiddymont Road to SR 99)
No Build	F1	F1-F3	NA
TSM	F1	E-F2	NA
Shorter Parkway	F2-F3	F3	NA
Shorter Parkway Plus TSM	F1-F3	F2	NA
Placer Parkway (Alternatives 1 through 5)	D-F1	F1	B
<p>Notes:</p> <p>F1 is one hour of LOS F conditions during the peak commute periods while F2 and F3 are two or three hours of LOS F conditions.</p> <p>NA = Not Applicable.</p> <p>SR = State Route.</p>			

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September 25, 2007

Via E-Mail and U. S. Mail

Celia McAdam, Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

**RE: Comments on the Draft Placer Parkway Corridor Preservation Tier 1  
EIS/Program EIR**

Dear Ms. McAdam:

On behalf of KT Communities, we submit the following comments on the above-referenced EIS/EIR.

**B-003-001**

The Draft Placer Parkway Corridor Preservation Tier 1 EIS/Program EIR concludes that among the build alternatives, Alternative 4 is the Environmentally Superior Alternative. However, there are a number of inaccuracies and inadequacies in the environmental analyses upon which this conclusion is based.

**1. Farmland Impacts**

**B-003-002**

The analysis of farmland impacts is not based on the most current data from the Department of Conservation Farmland Mapping and Mitigation Program (FMMP). The data that were used, as represented in Figure 4.4-1, are substantially different than the data that were released in 2006 based on 2004 mapping. In particular, figure 4.4-1 does not show any Farmland of Local Importance within the Placer County portion of the study area. The areas that are currently classified as Farmland of Local Importance have largely been classified as Other lands (e.g., not farmlands) in the EIS/EIR analysis. It should be noted that Placer County determined that impacts to Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance were considered significant in the Placer Vineyards EIR, adopted by the Board of Supervisors in July, 2007.

**B-003-001**

Please see responses to Comments B-003-012 through B-003-016, below.

**B-003-002**

At the time of preparation of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, in 2006, the most recent Farmland Mapping and Mitigation Program (FMMP) data were downloaded from the California Department of Conservation–Division of Land Resource Protection (DLRP) ftp site. These data were from 2002. Just prior to the release of the Draft Tier 1 EIS/EIR, the DLRP released 2004 FMMP data. Several commenters on the Draft Tier 1 EIS/EIR correctly noted that the 2002 FMMP data used in the farmland impact analysis in the Placer Parkway Corridor Preservation Tier 1 EIS/EIR Community Impact Assessment (CIA), and subsequently incorporated into the Draft Tier 1 EIS/EIR analysis, were not current.

The DLRP was contacted in August 2007 in order to obtain the most current information for use in the farmland analysis. According to the DLRP, the FMMP data are updated periodically, not on a regular schedule, based on information submitted by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS).

The data that were used for the farmlands analysis in the Draft Tier 1 EIS/EIR were updated and presented in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD), which was circulated for public review on January 30, 2009. A Notice of Preparation of the PRD was sent to the commenter.

In the PRD, Section 4.4 of the Draft Tier 1 EIS/EIR was revised and the potential impacts to farmland were reassessed. Figure 4.1-4 and Table 4.4-8 in the Draft Tier 1 EIS/EIR were also updated based on the 2004 FMMP data. The revised analysis in the PRD concludes that farmland

**B-003-002**

Due to the inaccuracies of the data used in the analysis, the impacts to Important Farmlands as summarized in Table 4.4-8 and Table 5-1 are misstated for all alignments. The relative difference between impacts associated with Alignment 4 and Alignment 5 is also incorrect. Based on an independent analysis of the current data, Alignment 4 impacts appear to be equal to and possibly in excess of those associated with Alignment 5.

## 2. Land Use Impacts

**B-003-003**

One of the criteria used to evaluate land use impacts is the number of parcels that would be bisected by the individual alignments. One rationale given for this evaluation criterion is that the size of fragments would not be large enough to remain useable. However, no discussion is provided as to either the size or ownership of the remaining parcels. Both of these characteristics should be considered in order to evaluate the potential for a given alignment to constrain future use of affected parcels. For example, if the bisection of a large parcel only separates a few acres from the parcel, its potential land uses may be virtually unchanged. Similarly if two adjacent bisected parcels are under the same ownership, the resultant parcels may still be suitable for the same types of land uses as they were prior to the split, by combining the two smaller resultant parcels into a single parcel.

**B-003-004**

A second rationale given for considering parcel bisection as an impact is that access to fragment parcels would be very limited since the Parkway will have a very limited number of interchanges. However, it is possible that access to split parcels may be available in many locations from existing and/or proposed surface roads associated with development in the project area. The EIS/EIR does not take this future local road network into consideration when evaluating this issue.

**B-003-005**

Table 4.1-3 lists the number of pre-existing inconsistent parcels affected by each alignment. These are parcels that are currently non-conforming to minimum parcel size. Since they are currently non-conforming, there is no clear rationale provided for why these are considered in the impact analysis, since presumably any further reduction in size would not create a new impact.

## 3. Noise Impacts

**B-003-006**

The analysis of noise impacts to the Regional University Specific Plan (RUSP) area that would result from Alignment 4 are described as "limited" in the Cumulative Impact Evaluation for noise (Section 4.10.3.5). The analysis of these impacts that was conducted for the RUSP finds that noise from this alignment would result in a significant impact. Based on the Placer Parkway EIS/EIR Traffic Noise Analysis Technical Memorandum, Appendix B, Input Data for Noise Modeling, the 60dBA contour for Alignment 4 in the area of the RUSP could extend as much as 1,700 feet from the centerline of the Parkway by the year 2040 if the Watt Interchange is constructed, or 1,533 feet without the Watt Interchange. Alignment 4 would be routed north of the RUSP site, with the closest segment within 300 feet of the western portion of the RUSP area,

impacts are greater for Alternative 4 than for Alternative 5, as noted by the commenter.

### **B-003-003**

The potential bisection of parcels was an evaluation criterion used in the impact analysis for land use (please see page 4.1-24). Size was a factor in the analysis, and all potentially affected parcels that would be less than 80 acres (current zoning is 80-acre minimum) with the implementation of each alternative are identified (please see pages 4.1-27 through 4.1-36, including Figure 4.1-5, and Table 4.1-3).

Ownership was not judged to be a criterion applicable to a Tier 1 analysis, both because it is speculative as to owners' future actions regarding combining parcels, and because the project level environmental review would occur in the future when ownership may be different.

Also, at this stage of development for the conceptual roadway, not enough information is available to provide a project-level analysis of the potential impacts, because only general concepts of the roadway design and location are known. If a corridor is selected and preserved at the Tier 1 stage, a subsequent Tier 2 analysis will evaluate the Parkway itself. That is, the specific roadway footprint within the selected corridor will be discussed in detail, including construction and operation of the roadway. Commitment to this tiered approach is evidenced by the statement in Section 4.1.5.1 on page 4.1-47 of the Draft Tier 1 EIS/EIR, which states that a land use-specific conversion and bisected parcel analysis will be evaluated on a parcel-specific basis in the Tier 2 analysis.

### **B-003-004**

Not enough information is available at this time to determine the future local roadway network, the exact amount of take and thus the actual size

**B-003-006** | where residential and school uses could be developed. Thus, portions of the RUSP area could be exposed to transportation noise levels that exceed the Placer County General Plan standards for outdoor activity areas (60 dBA) and exceed the interior standard for residential and school uses (45 dBA).

The ranking of combined impacts in Table 4.10-7 (Noise Impact Ranking by Alternative (2020)) is potentially confusing. The "No Build" option is shown only for comparison purposes and should thus not be ranked. Alternative 5 should be ranked as either 2 or 3 accordingly. There is also no explanation as to the relative nature of the ranking.

#### 4. Cultural Resources

**B-003-007** | The analysis of Cultural Resources concludes that Alignment 5 is the least archaeologically sensitive alternative of the five build alternatives. This information is not reflected in table ES-1 which presumably summarizes the impact analyses. Section 5.19.4 (Conclusion) states that the central segment of Alternative 4 is preferred over other build alternatives due in part to the lesser amount of impacts to potential historic resources as compared to the other build alternatives. However, impacts to historic resources appear to be identical for Alignment 4 and Alignment 5, while Alignment 5 is less sensitive than Alignment 4 for archaeological resources.

#### 5. Biological Resources

**B-003-008** | The EIS/EIR concludes that the central segment of Alignment 4 is superior to the corresponding segment of the other build alignments with respect to impacts to biological resources. This conclusion appears to be based exclusively on impacts to vernal pool complexes. The analysis fails to explain why this resource is given priority over all other resources analyzed. Some consideration should be given to the potential to avoid impacts to vernal pool complexes, since the width of the preserved corridor is significantly greater than the eventual proposed road width. If any single resource, such as vernal pool complexes, is to be given priority over other resources, then justification for this prioritization should be given, and the analysis should rely on current, accurate data to determine the quality of the resource. For example, a recent field inspection shows that approximately half of the acreage mapped as vernal pool complex for Alignment 5 is tilled agricultural land (see attached photo of area in question). If such analysis is not feasible in the Tier 1 effort, then a single preferred alignment cannot be definitively determined and multiple alignments should be moved forward to the next phase of analysis.

**B-003-009** |

**B-003-010** | Alignment 5 has substantially less impact on foraging habitat for Swainson's hawk and white-tailed kite than any other alignment yet this result is ignored in the conclusion.

of the remnant parcel, or the desires of the future owners. Analysis of the capability of the existing and planned local road network to provide access to bisected and/or fragmented parcels will be undertaken for the Tier 2 analysis. Please also see response to Comment B-003-003 for more information regarding the level of detail provided in this Tier 1 EIS/EIR analysis.

#### **B-003-005**

As disclosed in the Draft Tier 1 EIS/EIR in Section 4.1.3.2, consistency with existing zoning acreage requirements is one of six different evaluation criteria used to assess land use impacts of the proposed project. Further decrease in the size of a parcel that does not conform to the minimum zoning requirements is an indicator that a small parcel would become smaller, potentially reducing its viability for agricultural production. This parameter was therefore deemed to be appropriate to include at a Tier 1 level of environmental analysis. Please also see response to Comment B-003-003.

#### **B-003-006**

Section 4.10.3.5 of the Draft Tier 1 EIS/EIR describes potential cumulative noise impacts on the Regional University Specific Plan (RUSP) area. Based on Federal Highway Administration (FHWA) and Caltrans noise abatement criteria, noise levels within 1 A-weighted decibel (dBA) of the 67 dBA FHWA Category B absolute noise threshold (defined on page 4.10-4 of the Draft Tier 1 EIS/EIR), which applies to sensitive receptors such as schools, residences, churches, etc., is an impact, and requires consideration for reasonable and feasible abatement. As Table 4.10-2 explains, under the Placer County General Plan and County Noise Ordinance (Section 4.10.1.3), although the Placer County maximum noise level from a transportation noise source is 60 dBA, it may be acceptable to allow an exterior noise level up to 65 dBA provided exterior noise reduction levels have been implemented. Ultimately, the assessment of noise impacts and the need for noise

**6. Executive Summary Table and Conclusions**

**B-003-011**

The convention to show the least potential impact in bold text and the greatest potential impact in a shaded cell is not consistently applied to the ES-1 summary table. These inconsistencies make it difficult for the reader to understand the findings of the analysis and the ultimate conclusions. For example, Alternative 1 should be shaded for the Number of Residential Communities Affected under Socioeconomics. In another example, the row showing Vehicle Miles of Travel should point to Alternative 3 as having the greatest potential impact in 2020 with 17,885,664 VMT, not Alternative 5 as is currently shown with only 17,871,704 VMT.

**B-003-012**

The Conclusions section of the document is also lacking justification for why certain impacts are weighted more heavily than others. There is no discussion of the relative significance of impacts.

**7. 1000-foot Buffer Concept and Current Development Scenario**

**B-003-013**

The environmental analysis for the Placer Parkway corridor preservation began prior to much of the development activity that is currently underway or anticipated in the project area. Thus the analysis and conclusions do not give adequate consideration to the reality of future land use in the area. The preservation of a 1000-foot buffer has much less significance in a scenario where the Parkway is flanked by development, than in the originally envisioned scenario in which much of the adjacent land would remain in agricultural or other open space uses. The one notable exception to this incongruity may be Alignment 5, which has the potential to be adjacent to a large, contiguous open space (Reason Farms) to the north. This would be a strong argument in favor of Alignment 5 from a land use perspective.

**B-003-014**

**B-003-015**

**B-003-016**

Another land use consideration that has not been addressed is the likely and potential uses of the collective lands adjacent to the Parkway. Instead, the land use analysis in the EIS/EIR focuses primarily on impacts to individual parcels. Given the anticipated development in the project area, Alignment 4 has the potential to separate two communities (one to the north and the other to the south) as the area is likely to be developed. The Parkway, without access and egress points, would create a significant barrier to movement between the communities for purposes of commerce, use of recreational facilities, access to jobs, and schools. It could also result in infrastructure duplication.

abatement will be determined under the more detailed Tier 2 EIS/EIR.

The impact/abatement criterion to be applied (FHWA/Caltrans or Placer County) will depend upon which is developed first, residential developments or Caltrans sponsored roadways. If the residential developments are planned and programmed before the roadway, the lead agencies for Placer Parkway will be obligated to assess noise impacts and implement reasonable and feasible noise abatement according to their own protocol. If the roadway is developed before residential developments are planned and programmed, the developers will be required to assess noise impacts and implement noise abatement according to Placer County General Plan provisions.

The Draft Tier 1 EIS/EIR (Section 4.10.3.5) explains that the cumulative 66 dBA noise contour of Alternative 4 could impact a small area of the RUSP. Should Alternative 4 be selected as the preferred alternative and carried forward for Tier 2 analysis, then additional noise analysis would be undertaken at the Tier 2 stage to identify potential impacts on the RUSP, and appropriate mitigation measures would be considered as necessary to provide a significant level of noise reduction.

With respect to Table 4.10-7, the No-Build Alternative is included and ranked as an alternative because it is a required analysis under both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). It is included as an alternative throughout the Draft Tier 1 EIS/EIR, and would result in potential noise impacts in the study area in 2020. Alternative 5 is ranked as "4" because it would have the third highest potential combined noise impacts (absolute and relative), with Alternatives 2 and 3 both being ranked highest and the No-Build and Alternatives 1 and 4 both being ranked lowest. The ranking is explained in the notes accompanying the table.

Celia McAdam  
September 25, 2007  
Page 5

Thank you for this opportunity to comment on this important document.

Very truly yours,

HEFNER, STARK & MAROIS, LLP



By  
Timothy D. Taron

TDT:dan  
Enclosure  
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#### **B-003-007**

The commenter correctly points out an error in the discussion in Section 5.19.4. As described in Section 4.7.3.3 of the Draft Tier 1 EIS/EIR, while neither Alternative 4 or 5 has historic built environment resources in the Central Segment, Alternative 5 is the least archaeologically sensitive of all alternatives. Alternative 4 is the second least archaeologically sensitive of the build alternatives.

The third paragraph of Section 5.19.4 has been changed as follows:

In the Central Segment, Alternative 4 would be preferred over other build alternatives, due to the lesser amount of ~~significant unmitigable impacts on prime farmland and farmland of statewide importance; impacts to potential historic resources; and~~ impacts to biological resources, again with the least impact on vernal pool complexes.

Please note that the PRD that was circulated for public comment on January 30, 2009 also revised farmland information (please see response to Comment B-003-002), and identifies that the final paragraph of Section 5.19.4 on page 5-35 is revised as follows:

Based on this analysis, the No-Build Alternative is the Environmentally Superior Alternative under CEQA, except with respect to traffic, where it is substantially worse than all build alternatives. Among the build alternatives, Alternative ~~4~~ ~~5~~ *[4 is deleted; 5 is added]* is the Environmentally Superior Alternative under CEQA.

#### **B-003-008**

The evaluation of biological resource impacts considers at least seven separate categories, as summarized in Table 4.14-4 of the Draft Tier 1 EIS/EIR:



1. Wetland resources
2. Riparian habitat
3. Vernal pool complexes
4. Potential giant garter snake habitat
5. Potential Swainson's hawk/white-tailed kite nesting habitat
6. Potential Swainson's hawk foraging habitat
7. Potential valley elderberry longhorn beetle habitat

In the initial development of alternatives, as described in Section 2.5 of the Draft Tier 1 EIS/EIR, potential alternatives were modified in order to avoid environmental resources, with particular focus on avoidance of aquatic resources. However, as shown in Table 4.14-4, none of these seven resources are given priority over others in the environmental analysis presented in Chapter 4 of the Draft Tier 1 EIS/EIR. Alternative 4 would potentially affect fewer acres of vernal pool complex. Alternative 4 would have similar or lesser impacts to each of the other six biological resource categories except potential Swainson's hawk foraging habitat, while Alternative 5 would affect the least amount of wetlands. However, foraging habitat is not likely a limiting resource for Swainson's hawks in western Placer County compared to the other resource categories evaluated in the Draft Tier 1 EIS/EIR, as such habitat is plentiful.

**B-003-009**

The commenter states that approximately half of the vernal pool complex habitat mapped in Alternative 5 is tilled agricultural land. However, soil tilling or disking does not preclude the presence of vernal pool wetland features and associated special-status species because these activities do not alter the surface topography (depressions) and subsurface characteristics (e.g., claypan or hardpan) that are typically responsible for vernal pool wetland features.

Biological resources are evaluated in the Draft Tier 1 EIS/EIR based on existing available data in combination with reconnaissance surveys to

confirm the mapped data. The Placer County vernal pool complex mapping used in the Draft Tier 1 EIS/EIR was developed for the Placer Legacy project and has been used for planning associated with the Placer County Conservation Plan (PCCP) process. Selection of a single preferred alignment is reasonable based on the results of the analysis presented in the Draft Tier 1 EIS/EIR because the selection is based on the evaluation of a wide range of impact categories, including biological resources.

**B-003-010**

Potential impacts on Swainson's hawk and white-tailed kite foraging habitat are presented in Table 4.14-4 in the Draft Tier 1 EIS/EIR. This table shows that Alternative 5, along with Alternative 4, has the least amount of habitat potentially suitable for both nesting and foraging Swainson's hawks and white-tailed kites.

Section 4.14 of the Draft Tier 1 EIS/EIR does not include conclusions. Please see response to Comment B-003-012, which describes where in the Draft Tier 1 EIS/EIR conclusions are presented.

**B-003-011**

Revised Table ES-1, included in Chapter 2 of this Final Tier 1 EIS/EIR, has been revised to reflect these comments and others, as well as updates identified in the PRD circulated for public comment on January 30, 2009.

**B-003-012**

The only "Conclusions" section of the Draft Tier 1 EIS/EIR is in Chapter 5, CEQA Evaluation, Section 5.19.4, where environmental preferences are identified based on the impact discussions presented in this chapter, for purposes of identifying the Environmentally Superior Alternative.

The discussion does not weigh certain impacts more heavily than others. It primarily focuses on impacts that differentiate among alternatives. Since Section 5.19.4 is a summary of the information presented in this chapter, it does not recapitulate the "significance" of impacts under CEQA, which are described in detail in the preceding sections of the chapter. In these preceding sections, for each resource, "significant and unavoidable impacts" under CEQA, if any, are identified, by alternative, as are potential environmental effects that are not significant or that can be mitigated to below a level of significance. In the conclusion, a summary of this information is presented, focused on which alternatives have fewer impacts and which have greater impacts, in order to make a conclusion as to the Environmentally Superior Alternative under CEQA.

**B-003-013**

Future land use in the study area is taken into account in the environmental analysis for the Parkway. The analysis evaluates an opening-year scenario (2020) and also a future cumulative (2040) development projection scenario. Details of these scenarios are presented in Section 3.4 of the Draft Tier 1 EIS/EIR. Please also see response to Comment B-002-008.

**B-003-014**

While the project study area is predominantly undeveloped at this time, parts of the study area are within local General Plan designations that allow urban growth. In addition, numerous proposals for major new development projects in and around the study area are currently in various stages of the approval and entitlement process. The ultimate level of development, including the growth represented by these current project proposals, is addressed in the Draft Tier 1 EIS/EIR in the Cumulative Scenario (Year 2040). This accounts for the cumulative impact of the Parkway and other reasonably foreseeable developments,



including those now in the planning process of the local jurisdictions (page 3-10).

Please refer to response to Comment L-010-001 regarding adjustments to the no-development buffer in the context of changing land uses.

**B-003-015**

The commenter expresses a preference for a specific alternative. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR. The comment is noted.

**B-003-016**

The commenter expresses the concern that construction of Alternative 4 will create a barrier between future commercial and residential development to the north and south of the proposed roadway alignment. It is assumed that the commenter refers to the Central Segment of Alternative 4, where no interchanges are proposed as part of the project.

The Draft Tier 1 EIS/EIR considers anticipated development in the study area inasmuch as the 2040 analysis scenario assumes all of the known planned and proposed development in the study area. These projects are depicted on Figure 1-15 at the end of Chapter 1. No development is planned or proposed to the north of Alternative 4 in the Central Segment, save for the planned Reason Farms Retention Basin, within which some recreational facilities may be planned. Therefore, it is difficult to respond to the commenter's statement that anticipated development would occur to the north. However, as explained in Section 4.2.4.3 of the Draft Tier 1 EIS/EIR, existing and future roadway connectivity of local roadways will be maintained to ensure community access.

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September 25, 2007

Ms. Celia McAdam  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, California 95603

Re: Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/  
Program Environmental Impact Report ("EIS/EIR")

Dear Ms. McAdam:

These comments are submitted on behalf a group of property owners who own roughly 2,170 acres in the southern portion of the City of Roseville's adopted sphere of influence, commonly known as the proposed Sierra Vista Specific Plan ("SVSP"). The SVSP owners group believes that the construction of the Placer Parkway ("the Project") is an important component of Placer County's regional transportation network and, therefore, is generally supportive of the Project. The SVSP owners group does not, however, support the southernmost alignment, Alignment 1, as it is the least compatible with proposed land uses in Placer County. Moreover, Alternatives 1 would result in the most significant and substantial direct environmental impacts of the alternatives analyzed, as outlined below:

1. The U.S. Fish and Wildlife Service and California Department of Fish and Game's comment letter contains errors and unfounded assertions.

The SVSP owners group also submits this letter in response to the September 4, 2007, comment letter submitted by the U.S. Fish and Wildlife Service ("USFWS") and the California Department of Fish and Game ("DFG"). The USFWS/DFG letter contains

**B-004-001**

The commenter states that Alignment 1 is the least compatible with proposed land uses in Placer County and would result in the most significant and substantial direct environmental impacts of the alternatives analyzed. This comment is noted.

**B-004-002**

The commenter disagrees with a comment letter on the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR submitted by the U.S. Fish and Wildlife Service and California Department of Fish and Game (please see Comment Letter F-003). The transportation agencies (Federal Highway Administration, California Department of Transportation, South Placer Regional Transportation Authority) have responded to this letter in responses to Comments F-003-001 through F-003-012, and the commenter is referred to these responses. No additional response is required.

B-004-001

B-004-002

Ms. Celia McAdam  
September 25, 2007  
Page 2

B-004-002

several errors and unfounded assertions that require clarification. First, the USFWS/DFG's discussion of the Placer Vineyards Specific Plan "Blueprint Alternative" (21,631) was rendered moot by the Placer County Board of Supervisors' approval of the "Base Plan" (14,132 units) on July 16, 2007. (See USFWS/DFG Letter, p. 2.) Any further discussion of the "Blueprint Alternative," therefore, is irrelevant.

B-004-003

Second, the USFWS/DFG's letter states that "[t]he southerly alternatives, and most notably, Alternative 1, although quantitatively may result in greater direct impacts . . ., results in substantially and significantly lower likelihood and less risk of habitat fragmentation and or population isolation." (USFWS/DFG Letter, p. 4.) Assuming this assertion is true, the USFWS/DFG letter still fails to explain why lowering the risk of habitat fragmentation at the expense of increasing the Project's direct impacts on land use, population and housing, aesthetics, hydrology, water quality, and biological resources, is preferable. For example, lowering the risk of habitat fragmentation is neither intuitively nor biologically proven to be superior to increased impacts on wetlands.

B-004-004

Finally, the USFWS/DFG assert that Alternative 1 "would provide a substantially greater opportunity, along with other land in western Placer County, for conservation provided lands north of the alternative were dedicated to long term conservation purposes as proposed in *some* PCCP alternatives." (USFWS/DFG Letter, p. 5 (italics added).) The PCCP is currently being developed, and its ultimate mitigation strategy has not yet been determined. It is not clear which PCCP alternative, if any, will ultimately be adopted. Therefore, it is premature to state which Placer Parkway alignment alternative would be most consistent with the as-yet-undetermined PCCP mitigation strategy.

B-004-005

2. Alternative 1 would result in the most direct environmental impacts, and, as such, should be eliminated from further consideration in the EIS/EIR.

As the Tier 1 EIS/EIR makes clear, Alternative 1 would result in the most direct environmental impacts. The SVSP owners group respectfully request this alternative be removed from further consideration, given the substantially greater environmental impacts associated with Alternative 1:

Land Use: Alternative 1 would affect the greatest amount of total land acreage, while Alternative 4 would affect the least. (Tier 1 EIS/EIR, pp. 5-2 to 5-3.) Alternative 1 would result in significant conversion of farmland, result in potentially incompatibility with proposed land uses, conversion of lands under Williamson Act contracts, and inconsistency with applicable General Plan policies. (Tier 1 EIS/EIR, p. 5-30.) Alternative 1 is the least compatible with proposed land use plans; this alternative would affect the proposed SVSP,

**B-004-003**

Please see response to Comment B-004-002.

**B-004-004**

Please see response to Comment B-004-002.

**B-004-005**

The commenter states that the Draft Tier 1 EIS/EIR presents information that confirms that Alternative 1 would have greater potential environmental impacts on a number of resource categories as compared to other build alternatives. This comment is noted.

Ms. Celia McAdam  
September 25, 2007  
Page 3

B-004-005

Regional University Specific Plan ("RUSP") and Sutter Pointe Specific Plan ("SPSP"). (Tier I EIS/EIR, p. 5-3.)

Population and Housing: Alternative 1 would have the greatest impact on the displacement of isolated homes or farmsteads, on 120.6 acres of the rural residential settlement on the north side of Baseline Road. (Tier 1 EIS/EIR, p. 5-6.)

Aesthetics: Alternative 1 would have the most visual impacts of all alternatives, with potentially Moderate/High impacts using FHWA visual impact criteria. (Tier 1 EIS/EIR, p. 5-9.)

Hydrology: Alternative 1 would cause the most increase in impervious surfaces, which would lead to potential increases in runoff, a potentially significant impact. (Tier 1 EIS/EIR, p. 5-15.) Alternative 1 also has the most stream crossings (18 crossings).

Biological Resources: The corridor associated with Alternative 1 traverses the largest amount of wetlands. Alternative 1 in the Western Segment has 0.3 acre of wetland within the corridor alignment, 15.5 acres of wetland within the Central Segment, and 20.0 acres of wetlands within the Eastern Segment. (Tier 1 EIS/EIR, p. 4.4-11 to 4.4-22.)

3. The SVSP owners group supports selection of Alternative 5.

B-004-006

The SVSP owners group concurs with the City of Roseville's support of Alternative 5. Alternative 5 best preserves opportunities for a potential future Watt Avenue or Blue Oaks Boulevard interchange. Also, Alternative 5 represents the general alignment being considered by Sutter County in its SPSP planning process.

For all of the reasons stated above, the SVSP owners group respectfully requests that Alignment 1 be eliminated from further consideration in the Tier 1 EIS/EIR due to the extent of their potentially significant direct environmental impacts, as compared to the other alternatives, as well as their incompatibility with proposed land uses in Placer County.

Very truly yours,



Megan M. Quinn

### B-004-006

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

Ms. Celia McAdam  
September 25, 2007  
Page 4

cc: SVSP Owners Group  
Marcus Lo Duca  
Kathy Pease, City of Roseville

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September 25, 2007

VIA ELECTRONIC MAIL  
AND FIRST CLASS MAIL

Placer County Transportation Planning Agency  
Attention: Celia McAdam, Executive Director  
299 Nevada Street  
Auburn, California 95603

**RE: Placer Parkway Draft Tier 1 Environmental Impact Statement/Program  
Environmental Impact Report**

Dear Ms. McAdam:

I represent the Measure M Owners Group. The Measure M Group is the team that has proposed the 7,500-acre Sutter Pointe Specific Plan project in south Sutter County. The Sutter Pointe Specific Plan is located along both sides of State Route 99/70 in the vicinity of the western terminus of Placer Parkway. We have reviewed the draft EIR/EIS Tier 1 document and offer the following comments:

**B-005-001**

1. We have spent the last 2 ½ years working on the land use plan for Sutter Pointe. As part of our planning effort, we have planned for the eventual construction of Placer Parkway. However, we have planned for it in only one location, along Sankey Road (currently identified as alignments 4 and 5). An alignment other than Sankey Road would divide our community and result in irreparable harm to our development concept.

**B-005-002**

2. Any of the southern alignments create operational problems. We are currently working with Sutter County and Caltrans to construct an interchange at Riego Road and State Route 99/70 beginning in 2011. The proximity of Placer Parkway connection to State Route 99/70 for the southern alignments would be too close to the Riego Road/SR 99/70 interchange. Certain traffic movements would probably not be permitted such as westbound Riego Road to northbound to SR 99/70. Plus, westbound Placer Parkway traffic heading south on SR 99/70 may conflict with westbound Riego Road traffic getting on southbound SR 99/70.

**B-005-003**

3. Alignment 4, the Sankey Road alignment, has been found to be the least environmentally damaging alternative and should be selected.

**B-005-004**

4. On multiple occasions, Sutter County has indicated its preference for the Sankey Road alignment.

### **B-005-001**

The alternatives for Placer Parkway analyzed in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR include two alternatives located along Sankey Road, as noted by the commenter. Because the Sutter Pointe Specific Plan (SPSP) was not approved at the time of publication of the Draft Tier 1 EIS/EIR, the environmental review cannot consider the SPSP as an approved project with actual conflicts based on existing plans. Placer County Transportation Planning Agency (PCTPA) has been working with Sutter County since the 1990s regarding Placer Parkway, and with the commenter since his involvement with the SPSP. The environmental analysis in the Tier 1 EIS/EIR does consider the proposed SPSP, particularly as respects proposed dwelling units, commercial and industrial acreage and resulting jobs, and the environmental impacts that could result from such development, at a Tier 1 level. It is acknowledged that selection of Alternatives 1, 2, or 3 would present difficulties to the current development concepts for the SPSP. Decision-makers at the Federal Highway Administration (FHWA) and SPRTA will consider the issues brought up by the commenter in making a final decision on the preferred alternative.

### **B-005-002**

The commenter notes operational conflicts between the southern alignments and the planned interchange at Riego Road and State Route (SR) 70/99. Alternatives 1, 2, or 3 would be designed to avoid direct conflicts with this interchange by providing braided ramps to eliminate weaving problems associated with this interchange, as described on page 2-2 of the Draft Tier 1 EIS/EIR.

The SR 70/99 Placer Parkway interchange would provide complete high-speed freeway-to-freeway connector ramps for all traffic to and from Placer Parkway and SR 70/99. This alternative would require that access to and from Placer Parkway at Riego Road and the SR 70/99 interchange not be allowed, for safety reasons, as described on page 2-7

**B-005-005**

5. The Draft EIR/EIS does not identify an overcrossing over the railroad tracks which run north and south, just east of Natomas Road.

**B-005-006**

6. The Draft EIR/EIS assumes no development by 2020. At this point, we estimate that Sutter Pointe will begin construction by 2010. The EIR/EIS should at least assume some level of both residential and non-residential development by 2020.

Thank you for the opportunity to comment on this project. We encourage the Agency to continue to work with Sutter County and the Measure M Group regarding the completion of the Placer Parkway.

Sincerely,

ORIGINAL SIGNED

George M. Carpenter, Jr.

cc: Doug Libby, Sutter County Community Services (via email only)  
Pierre Martinez, Lennar Communities (via email only)

of the Draft Tier 1 EIS/EIR. PCTPA has been working with Caltrans to include a longer than normal overcrossing structure at the Riego Road/SR 70/99 interchange to provide for Placer Parkway ramps.

It is acknowledged that operations of Alternatives 1, 2, or 3 near SR 70/99 are not optimal, and would require access to the Parkway via a local interchange, requiring travel through the SPSP area. However, the operations as proposed would eliminate conflicts and preserve safe operations.

PCTPA and FHWA have been working with Sutter County and Caltrans to ensure that the final design of the improved interchange could accommodate both the ramps as well as the westbound Riego Road traffic getting on southbound SR 70/99. Please also see response to Comment B-005-001.

**B-005-003**

Please note that the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD), circulated for public comment on January 30, 2009, identifies that Alternative 5, not Alternative 4, is the Environmentally Superior Alternative under CEQA. This change was also described as part of project presentations at the February 23 and 25, 2009 public hearings on the PRD held in Yuba City and Roseville, California.

**B-005-004**

The commenter notes that Sutter County has expressed a preference for the Sankey Road alignment on numerous occasions. This comment is correct, and has been noted. Please see Comment Letters L-008 and L-019, in which Sutter County reiterates this position, and Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**B-005-005**

The second paragraph of Section 2.2.2 on page 2-2 of the Draft Tier 1 EIS/EIR identifies that, as necessary, bridges would be used to span certain features and improvements, such as the Natomas East Main Drainage Canal, which is close to the nearby railroad tracks identified by the commenter. It is likely but not certain that the span would also include the railroad tracks.

During the Tier 2 environmental review, once a corridor alignment alternative has been selected, more detailed design will be undertaken, including the identification, locations, and design of overcrossings.

**B-005-006**

It was recognized that the 2020 scenario did not include development in new growth areas that were not yet approved for urban development. However, the projected growth per year between 2004 and 2020 in the Traffic Analysis Study Area (TASA) is actually slightly higher than the projected growth per year between 2004 and 2040. While the potential approval of new development areas prior to 2020 may change the location of 2020 development somewhat, it would not be anticipated that there would be more development in the TASA by 2020.

Please also see the second paragraph of response to Comment B-001-002.



# Brookfield Land

2271 Lava Ridge Court Ste. 220 Roseville, California 95661

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September 21, 2007

Celia McAdam, Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street,  
Auburn, CA 95603

Re: Placer Parkway Draft Tier 1 EIS/EIR

Dear Ms. McAdam:

Brookfield Land (Brookfield) offers the following comments regarding the Placer Parkway Draft Tier 1 Environmental Impact Statement / Program Environmental Impact Report (DEIS/DEIR). Brookfield appreciates the opportunity to provide its input in this environmental review process, and supports the project subject to the concerns expressed below.

## BACKGROUND

Brookfield has development interests in 680 acres of undeveloped land lying mainly in the Eastern Segment of the proposed Parkway alignment. The Brookfield site is located on the south side of Sunset Blvd., 1.5 miles west of Fiddymont Road. The site is bordered by the Creekview Specific Plan area on the south, by the Placer Ranch Specific Plan area on the east and Reason's Farm to the west. The corridor would traverse the northern and western quadrants of Brookfield's site, and divide the northwest corner from the remainder. In all, the proposed alignment and buffer would occupy nearly 1.5 miles and over 165 acres of Brookfield's site, or approximately 24% of Brookfield's site.

## COMMENTS

B-006-001

### Brookfield's Planned Development

The DEIS/DEIR incorrectly describes the development status of Brookfield's property. The DEIS/DEIR states that no development is currently proposed for this site. On June 20, 2007, however, the City of Roseville accepted a Notice of Intent to consider an amendment to its sphere of influence to include

### **B-006-001**

The future proposal of the Brookfield site is acknowledged. However, no proposals for development were under consideration by the City of Roseville or any other jurisdiction at the time the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR was published, or to this date. The development assumptions in the Draft Tier 1 EIS/EIR were approved by the project's Advisory Committee, including participation from the City of Roseville, and no changes to the Draft Tier 1 EIS/EIR are warranted. Please also see response to Comment L-012-009.

**B-006-001**

Brookfield's property and identify the property for future annexation into Roseville. Brookfield's potential units are being analyzed in various public facilities studies within the region. Accordingly, Brookfield's site should be identified as planned or possible future development in section 1.5.2 of the DEIS/DEIR, and in other portions of the DEIS/DEIR where Brookfield's site is mentioned.

**Need for New Project Alternative**

**B-006-002**

Second, and of critical importance, the DEIS/DEIR neglects to discuss or evaluate a key project alternative. The DEIS/DEIR does not analyze whether project objectives could be satisfied and environmental impacts could be minimized by using a narrower Parkway corridor.

Under CEQA, an Environmental Impact Report must discuss a range of reasonable project alternatives "which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (Guidelines, § 15126.6, subds. (a), (c).) NEPA, likewise, requires discussion of "alternatives to the proposed action." (42 U.S.C. § 4332 (2)(C)(iii).)

The Parkway, in its current proposed form, is an exceptionally wide transportation corridor. The corridor cuts a minimum swath of 500 feet, and broadens to 1,000 feet for the majority of its length. By comparison, Interstate 5 is no more than 250 feet wide, including shoulders, roadways and medians, for most of its length throughout northern California. The Parkway's current design places it among the widest transportation corridors in California, notwithstanding the "parkway" concept, and significantly wider than the 99/70 and 65 routes which it proposes to connect.

The impacts resulting from the size of the corridor are significant. The corridor poses additional land impacts to between 1,623 and 1,917 acres, depending on the alignment selected. This includes several hundreds of acres of critical farmland as well as land subject to Williamson Act contracts. The DEIS/DEIR also estimates impacts of up to 35.8 acres of wetlands, 127 acres of vernal pool complexes, 340 acres of Giant Garter Snake habitat, and 1,024 acres of Swainson's Hawk habitat, among other biological impacts. Further, the DEIS/DEIR describes additional impacts to hydrology, public services and utilities, cultural resources and socioeconomics.

These impacts could be substantially reduced by narrowing the width of the corridor. Brookfield's 680-acre property, for example, stands to lose 165 acres through implementation of the project now being contemplated. The impacted land includes significant vernal pool complexes, a stream and habitat for special-status species. Reducing the width of the proposed corridor would lessen or avoid significant land-use, biological and other impacts. Further, an

**B-006-002**

The size of the no-development buffer was developed early in the planning process for the Parkway, and is intended to provide space for the ultimate alignment of the roadway, should the project be adopted, and to achieve the other purposes of the buffer. Although the Draft Tier 1 EIS/EIR presents a worst-case analysis by identifying all the resources within the buffer area that are potentially subject to impact, most of these resources will be preserved in place by the buffer. Only the area within the roadway footprint will be subject to direct impacts; the remaining area within the buffer will not be affected by the Parkway. Therefore, impacts to the resources mentioned could not be reduced by reducing the size of the buffer. In fact, a smaller buffer would expose those resources to impacts from other future projects.

Alternatives to the project are discussed in Section 2 of the Draft Tier 1 EIS/EIR. Possible alternate sizes for the buffer were considered in the planning process described in Section 2.4 of the Draft Tier 1 EIS/EIR. A separate set of corridor alignment alternatives with a narrower buffer is not necessary to evaluate the potential impacts of the project.

Please see Master Response 1 for further discussion of the buffer, and response to Comment L-010-001 regarding adjustments to the buffer in the context of changing land uses.

B-006-002

alternative that reduces the width of the corridor would supply the CEQA-required project alternative for the project's Eastern Segment, where none currently exists.

A "reduced footprint" alternative also could feasibly attain most of the basic objectives of the project. A 500-foot corridor width provides more than ample space for a high-speed roadway, which is the central purpose of the project.

B-006-003

If one of the goals of the 1,000-foot corridor is to control land use adjacent to the Parkway, then we believe that should not be part of this effort. The local jurisdictions (Placer County, City of Lincoln, City of Roseville and Sutter County) are the land-use authorities along the route. To impose a permanent restriction within the study corridor that goes beyond the limits of the right of way needed to build the roadway is a "take" beyond what we feel is reasonable. Compensation for the "takes" along the route would result in a more significant use of public funds to acquire the right of way, in addition to creating incidental takes such as the stranded property to the north of the Parkway alignment as it passes through Brookfield's site. This approximately 82-acre triangle created would be cut off from the balance of our property, and not serve the existing use under current agricultural zoning, let alone what might be considered for future plans.

In summary, after considering the substantial reductions in impacts that could be accomplished by a reduced-footprint alternative, the alternative seems like it should be analyzed within the DEIS/DEIR. Although we support the effort to relieve traffic congestion on the Highway 65 and Interstate 80 routes, we believe it can be done through less damaging and less costly methods.

#### CONCLUSION

Brookfield believes the Placer Parkway concept represents a strong first step towards managing projected growth in southwestern Placer County and southern Sutter County. We appreciate the opportunity to comment, and would be pleased to provide any additional information requested concerning its development plans or the foregoing comments.

Very truly yours,



Deanne M. Green  
Project Manager  
Brookfield Land

#### **B-006-003**

The purposes of the no-development buffer are discussed in Master Response 1. Taking of property for the Parkway, and appropriate mitigation and compensation are addressed in Section 4.1.4.1 of the Draft Tier 1 EIS/EIR. Please also see response to Comment L-010-001.



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September 24, 2007

Ms. Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

Re: Comments on the Placer Parkway Corridor Preservation Project Draft Tier 1 EIS/Program EIR

Dear Ms. McAdam:

Thank you for providing our client, Blue Oaks Property Owners Group ("BOPO"), the developers of the Creekview Specific Plan ("Creekview"), an opportunity to comment on the Draft Tier 1/Program EIR for the Placer Parkway Corridor Preservation Project ("Draft EIS/EIR"). On behalf of the Blue Oaks Property Owners, we have taken this opportunity to highlight key concerns regarding the Placer Parkway Corridor Preservation Project that we believe merit consideration in the Final EIS/EIR. In short, we are concerned that the Draft EIS/EIR violates the requirements of both the National Environmental Policy Act ("NEPA") and the California Environmental Quality Act ("CEQA") because the analysis improperly segments or piecemeals the Placer Parkway Project in a manner in which:

- fails to accurately describe the Creekview Specific Plan and development time frames, and intentionally defers the analysis of impacts to a later date;
- omits an analysis of impacts to the Creekview Specific Plan and other development within the area,
- dismisses the impacts associated with the "no development buffer zone" on the one hand, while relying on the buffer zone for mitigation for undefined impacts on the other; and
- fails to adequately evaluate cumulative impacts.

1. Background on Creekview Specific Plan

The Creekview Specific Plan is located in western Placer County, immediately northwest of the City of Roseville's existing City limits, west and north of the West Roseville Specific Plan ("WRSP") area, in unincorporated Placer County. The 650-acre project is located north of the future extension of Blue Oaks Boulevard, north of the Pleasant Grove Wastewater Treatment Plant and the Roseville Energy Park. A ten-acre finger of the project is located south of the planned extension of Blue Oaks Boulevard.

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**B-007-001**

The commenter provides information regarding the proposed Creekview Specific Plan (CSP), and expresses concern that the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR violates the National Environmental Policy Act and the California Environmental Quality Act because it segments or piecemeals the Placer Parkway project. These concerns are unfounded, as the Draft Tier 1 EIS/EIR considers the Placer Parkway project as a whole.

The commenter alleges that the Draft Tier 1 EIS/EIR fails to adequately describe the CSP and development time frames, and intentionally defers the analysis of impacts to a later date. The Draft Tier 1 EIS/EIR does not improperly defer analysis of impacts; by its nature a tiered or program document is more general than a project-level environmental document. The tiering concept includes a broad-based level of detail that emphasizes relative differences among corridor alternatives. This approach was used in part because of the rapidly growing development pressure that southwest Placer County was experiencing, and the need to preserve a corridor as soon as possible, within which a future Placer Parkway would be constructed. This is discussed in detail on pages ES-2 through ES-4, and on pages 1-1 and 1-2.

As the commenter notes, the Parkway would affect the proposed CSP, but no publicly available information was available about Plan area specifics at the time the Draft Tier 1 EIS/EIR was written, so a detailed analysis was not possible. In the Notice of Preparation issued for the CSP on March 6, 2008, nine months after the Draft Tier 1 EIS/EIR was circulated for public comment and six months after the commenter's letter was written, the project description clearly identified that the Parkway was being planned in the location(s) identified in the Draft Tier 1 EIS/EIR. This was one of the stated purposes of pursuing a Tier 1 approach, "so that the location of the future Placer Parkway can be considered in local jurisdictions' planning decisions" (page ES-3).

**B-007-001**

The eastern-most portion of the Creekview Specific Plan is within the City of Roseville's current sphere of influence (SOI) and was contemplated as part of the WRSP. The SOI that covers the Creekview Specific Plan was analyzed in the WRSP Feasibility Analysis and WRSP EIR for the purposes of expanding the City's sphere to its present location. Development plans are under consideration for this portion of the Creekview Specific Plan.

The Creekview Specific Plan includes a SOI expansion to add approximately 136 acres of the Reason Farms panhandle site to the City's SOI. The City is evaluating the SOI expansion area for potential use as a university/job center and has developed programming characteristic concept plans to evaluate the service needs for these uses so that Creekview infrastructure can be sized appropriately. For the 511-acre portion of the Creekview Specific Plan area within the City's existing SOI, a specific plan is being prepared for a mixed-use community. The Specific Plan would involve the phased development of a mix of residential (2,277 units), commercial, mixed-use, parks, open space and public uses to accommodate the growing population of western Placer County. The project is being prepared to implement the planning principles of the Regional Blueprint.

In 2005, the City initiated the specific planning process and is currently engaged in the environmental review and entitlement process for the Creekview Specific Plan. Proposed development is expected to be complete before the year 2020, contrary to the Draft EIS/EIR assumptions indicating that Creekview development will not occur before 2040 (p.3-4-7).

As shown on the attached exhibit, Creekview is immediately east of the point where all of the eastern and central segments of the Placer Parkway alignments converge. Regardless of the alignment selected, Placer Parkway is coterminous with the western boundary of the Creekview Specific Plan ("SOI expansion area"), and the property would be substantially impacted by all of the alternative corridors and the no-development buffer zone currently under consideration.

**B-007-002**

2. Lack of Coordination with Local Jurisdictions and Landowners

We value the South Placer Regional Transportation Authority ("SPRTA") and Placer County Transportation Planning Agency's ("PCTPA") (hereinafter, all references to "SPRTA" shall include PCTPA) efforts to coordinate with affected agencies, landowners and organizations regarding the planning of the Placer Parkway Corridor Project. We understand that SPRTA conducted over 15 workshops or meetings with the Advisory Committee as part of this consultation effort. Notwithstanding such efforts, the Draft EIS/EIR fails to account completely for the Creekview project, nor does the document reflect any effort to coordinate the multiple concurrent planning processes.

We appreciate that SPRTA believes it coordinated with local jurisdictions and landowners, such as the BOPO Group, given SPRTA's decisions with respect to a future alignment of the Parkway. We respectfully request, however, that SPRTA take a hard look at the impacts the Parkway corridor will have on Creekview, undertake a concerted effort to ensure that consultation occurs with BOPO and other affected parties, and that conflicts are minimized to the greatest extent possible while identifying avoidance and minimization measures to address such impacts on the Creekview Specific Plan as discussed below.

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Development time frames can vary widely over the 40-year horizon for the Placer Parkway project, as acknowledged in the Draft Tier 1 EIS/EIR and as explicitly discussed in Section 3.6.1. This has been true of the CSP even since the commenter's letter was written, and is one of the reasons that the 2020 and 2040 horizon years were developed for analysis. These years were intended to "bracket" regional development levels from a low (2020) to high (2040) level, as described in response to Comment B-002-008, and it was not intended to include an analysis of specific projects' development time lines in the Tier 1 environmental review.

Please see response to Comment L-010-001 for a discussion of the no-development buffer, which is not offered as mitigation for any impacts.

The Draft Tier 1 EIS/EIR adequately analyzes cumulative impacts. The cumulative impact scenario is described in detail on pages 3-4 through 3-7, and was approved by the project's Advisory Committees, which considered input from local jurisdictions and regional and federal agencies. The 2040 analysis in each of the technical sections of Chapter 4 is the cumulative impact analysis, which is summarized in Section 5.18 for CEQA considerations.

**B-007-002**

Please see pages 2-21 through 2-25 for a history of the coordination with local jurisdictions and landowners. Since at least 1999, staff from Placer County and the City of Roseville have been active participants in the Technical Advisory Committee (TAC) and the Study Advisory Committee (SAC) for the project. Interested stakeholders were added to the e-mail distribution list for SAC meetings as they became known, including representatives of the Blue Oaks Property Owners Group (BOPO), and the public was welcome to attend and provide input. During the development of the Draft Tier 1 EIS/EIR, these committees met eight

B-007-003

3. The Draft EIS/EIR Fails to Adequately Evaluate Impacts to Creekview.

Each of the corridor alternatives (with the “no development buffer” zone as proposed in the EIS/EIR) will impact the Creekview Specific Plan area. In conjunction with the proposed preservation corridor, the alignments could severely impact development of the western edge of the Creekview Specific Plan area where a university and/or job center uses are planned.

It appears that SPRTA did not consider the location of the alignments or the buffer zone in terms of the impacts associated with any proposed alignment adjacent to Creekview. Chapter 4.1 acknowledges that all alternatives will have similar land use compatibility issues, but the EIS/EIR concludes that because there are no adopted plans for Creekview, Sierra Vista, Placer Ranch, Brookfield and Reason Farms Master Plan update, the actual effects are unknown. The EIS/EIR further states that it would be up to the development proposals, themselves, to accommodate the corridor alignment selected by SPRTA, rather than for SPRTA to evaluate the impacts on the development proposals (see p. 4.1-36).

We are surprised that SPRTA would choose to ignore available information from the City of Roseville and Placer County regarding the pending development proposals. This information includes the Memorandum of Understanding (“MOU”) between the City of Roseville and Placer County (1997, amended 1999) that contemplated development in the Creekview Specific Plan area; the West Roseville Specific Plan EIR (2004) that identified portions of the Creekview Specific Plan as part of the Remainder Area that would be annexed to the City and developed in the future; the City’s Growth Management Visioning Committee’s (GMVC) (2005) recommendations identifying this area for potential sphere of influence expansion; and actions by the Roseville City Council (May 2007) and Placer County Board of Supervisors (June 2007) initiating the processing of the Creekview Specific Plan, consistent with the MOU. Such policy direction does not excuse the EIS/EIR conclusion on page 4.1-21 that because the Creekview Specific Plan is in the preliminary stages of planning, detailed land uses plans are not available. By contrast, through the previous WRSP and current Creekview planning processes, the City of Roseville has accumulated a large body of technical information (i.e. mapping, biological surveys, cultural resources surveys, hydrology, land use studies, circulation plans, etc.) that could further inform the Placer Parkway EIS/EIR analysis.

For these reasons, we request that SPRTA evaluate and quantify in the Draft EIS/EIR the Placer Parkway project’s impacts to existing and proposed land uses, wetlands and other biological resources, the loss of agricultural resources, and transportation and circulation effects, among others.

B-007-004

4. The Draft EIS/EIR Fails to Adequately Evaluate the No Development Buffer Zone.

The Draft EIS/EIR indicates that the purpose of the Tier 1 analysis for the proposed project is to “preserve right-of-way for a new or upgraded east-west connector between SR 65 and SR 70/99” (page 1-8). According to the EIS/EIR, “[t]he Proposed Action for the Placer Parkway Corridor Preservation Project is to select and preserve a 500- to 1,000-foot-wide corridor in the project study area” (page 3-3) and the Draft EIS/EIR refers to the “No Development Buffer” at a variable width ranging from between 500-to 1,000-foot-wide.

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and six times, respectively, as described in Appendix A of the Draft Tier 1 EIS/EIR. Representatives of the BOPO attended several SAC meetings. In addition, Placer County Transportation Planning Agency (PCTPA) staff met with representatives from the BOPO on October 27, 2003 and February 19, 2004.

The Parkway project team and BOPO representatives coordinated extensively with respect to the Parkway between 2003 and 2007 and the Parkway project team shared the Parkway Geographic Information System's (GIS) files with BOPO engineers.

During development of the Tier 2 or project-level environmental document, the EIS/EIR lead agency (South Placer Regional Transportation Authority [SPRTA] or another jurisdiction) will continue to coordinate with all affected landowners.

B-007-003

Neither the 1997 Memorandum of Understanding (MOU), as amended, nor the actions by the Roseville City Council in 2007 provided CSP land use assumptions, which are necessary for detailed impact analysis. Without an approved plan, the Draft Tier 1 EIS/EIR cannot evaluate impacts more specifically. The Draft Tier 1 EIS/EIR evaluates the impacts of the Parkway on planned and proposed development at a Tier 1 level of detail, as is appropriate for corridor selection purposes. This is particularly appropriate for the CSP, as the commenter notes that all build alternatives would have similar impacts on the CSP.

As an example of an appropriate Tier 1 level of analysis, consider noise impacts. Noise contours are provided for 2040 buildout conditions (please see Figure 4.10-8), and mitigation commitments for noise include requests that jurisdictions coordinate with applicants for development proposals so that their project planning processes can account for the likely noise impacts of the Parkway, and avoid costly mitigation in the

B-007-004

The Draft EIS/EIR further describes the purpose of the "No-Development Buffer" as a "corridor that is wider than what is needed for the proposed roadway, with lands on one or both sides of the facility," which would be intended to further a parkway concept that maintains and preserves open space, protects biological resources, prevents future development encroachment, and limits access to the Parkway as defined in Section 2.2.4.1. The Draft EIS/EIR further states that "[s]ince the value of the no-development buffer zones to maintain the parkway concept and limit access depends to some extent on the adjacent land uses, it may be appropriate to adjust the final size and shape of the buffer based on Tier 2 analysis of the Parkway." (§2.2.41 at p. 2-9.) In this way, the EIS/EIR characterizes the buffer zone as a tool to prevent development (see e.g., p. 4.1-29, first full paragraph and p. 4.1-44, first paragraph).

Although the Draft EIS/EIR indicates it may be appropriate to adjust the final size and shape of the buffer based on the Tier 2 analysis of the parkway, the Draft EIS/EIR is unclear as to whether the entire corridor width will be preserved and no development will be allowed in the entire "no development" buffer zone before SPRTA selects a preferred alignment. If the intent is to preserve the entire width (which is inconsistent with prior understandings from SPRTA), the Draft EIS/EIR fails to evaluate any environmental impacts associated with acquisition and/or preservation of the entire corridor in advance of selection of a preferred Placer Parkway alignment. Moreover, no information or analysis is provided to support the need for the entire corridor width for all of the alternatives, particularly, since SPRTA has yet to identify a preferred alignment.

Creekview is particularly concerned with the size of the proposed corridor in the alternatives. If SPRTA does intend to preserve a blanket 1,000 foot wide corridor along the Placer Parkway corridor, it will affect Creekview and many other development plans currently undergoing review and approval. Such an approach conflicts with Placer County's directive that the Placer Parkway Project be processed concurrently with development project efforts in the region (see e.g., 10/20/2003 Board of Supervisors Meeting Minutes). Further, the EIS/EIR fails to identify any mitigation for Placer Parkway impacts to Creekview and other development proposals within this buffer zone. Therefore, we respectfully request that SPRTA consider significantly reducing the size of the corridor (which would avoid the otherwise significant impacts to surrounding properties. Since the Board of Supervisors directed several development efforts to occur concurrently, SPRTA cannot shift their obligations to evaluate impacts under CEQA and NEPA to another project that is impacted by the proposed action.

B-007-005

5. The Draft EIS/EIR Fails to Adequately Evaluate Cumulative Impacts

As the Draft EIS/EIR acknowledges, many pending and reasonably foreseeable cumulative projects are under review throughout Placer County and Sutter County (see e.g., pp. 1-32 – 1-35). Many of these development efforts have been underway for decades. Nonetheless, the Draft EIS/EIR simply acknowledges these cumulative projects, but fails to evaluate the combined impacts of past, present and reasonably foreseeable development within the study area in accordance with CEQA and NEPA. (See e.g., 14 Cal. Code Regs. 15130; 40 CFR 1508.7). Here, the Creekview

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future (page 4.10-40). This is entirely appropriate for a Tier 1 environmental analysis, especially in the absence of a detailed land plan.

The Draft Tier 1 EIS/EIR does evaluate and provides some quantification where appropriate for the project's impacts to existing and proposed land uses (Section 4.1), wetlands and other biological resources (Section 4.14), the loss of agricultural resources (Section 4.4), and transportation and circulation effects (Section 4.8), as well as all other required environmental resources (Chapter 4). Revision of the Draft Tier 1 EIS/EIR is not required.

**B-007-004**

Taking of property for the Parkway, and appropriate mitigation and compensation are addressed in Section 4.1.4.1 of the Draft Tier 1 EIS/EIR. Please see Master Response 1 for further discussion of the no-development buffer, and response to Comment L-010-001 regarding adjustments to the buffer in the context of changing land uses.

The Placer County Board of Supervisors did direct County staff to proceed with Parkway planning and processing private development proposals at the same time. Continuing to evaluate the Parkway project as proposed, including the buffer, is not inconsistent with the Supervisors' action. The Parkway design has included a buffer since early planning stages. Potential conflicts with private development proposals do not mean that planning cannot proceed at the same time. Potential conflicts with private development proposals are not environmental impacts of the Parkway project and do not require mitigation other than that provided in Section 4.1.4.1 of the Draft Tier 1 EIS/EIR.

**B-007-005**

The Draft Tier 1 EIS/EIR evaluates the potential contribution of the Parkway to the cumulative combined impacts of other projects within two

Ms. Celia McAdam  
September 24, 2007  
Page 5

B-007-005

Specific Plan is a reasonably foreseeable future project that should be evaluated in the Draft EIS/EIR. (See 40 CFR 1508.7 (defining cumulative impacts to be considered under NEPA).)

Throughout the Draft EIS/EIR, the document acknowledges that Placer Parkway in conjunction with other cumulative projects in the vicinity would result in undefined significant cumulative impacts. In many instances, however, the EIS/EIR fails to quantify and evaluate the cumulative impacts. For example, although the Draft EIS/EIR indicates on page 4.14-32 that the Placer Parkway project would occupy approximately 500 to 600 acres, and additional development anticipated by 2040 would "reduce and fragment remaining habitats within Sutter County and western Placer County substantially," the EIS/EIR fails to describe and quantify the specific impacts. In other instances, the EIS/EIR misrepresents the scope and timing of future development by assuming such reasonably foreseeable development will occur by 2040 when, in fact development, such as Creekview, is projected to occur before 2020.

SPRTA should revise the Draft EIS/EIR to describe the specific impacts to wetlands, special-status species and their habitats, and the amount of acreage that would be fragmented by Placer Parkway and cumulative development projects. In this regard, SPRTA might find useful information and quantitative analyses from other cumulative analyses that have been and are continuing to be conducted for projects in the surrounding vicinity, such as the EIR analysis for the Placer Vineyards Specific Plan.

We appreciate the opportunity to review and comment on the Draft Tier 1 EIS/EIR. Based on our review, we respectfully request that SPRTA substantially revise and recirculate the EIS/EIR to provide further analysis of the Placer Parkway impacts and mitigation measures to avoid and minimize impacts to the Creekview Project and to address cumulative impacts. Creekview remains interested and willing to work together in a collaborative effort as you proceed with the Placer Parkway planning process in hopes that by working together with SPRTA an alignment can be developed for the Placer Parkway that offers a solution for the County, the City of Roseville, the agencies and Creekview.

Very truly yours,

  
Alicia Guerra

cc: John Sprague, City of Roseville  
Mark Morse, City of Roseville  
Kathy Pease, City of Roseville  
Bill Turpie, Blue Oaks Property Owners  
Kris Steward  
George Phillips

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scenarios that are intended to bracket potential future regional development levels between 2020 and 2040. These scenarios are described in more detail in Section 3.4 of the Draft Tier 1 EIS/EIR. The 2040 scenario assumes the implementation of the Creekview Specific Plan and provides a general analysis of impacts at the highest projected level of future regional development.

The analysis of cumulative environmental impacts in the Draft Tier 1 EIS/EIR reflects the 2040 scenario and provides appropriate detail for a Tier 1 project. Project-specific analysis of impacts will be undertaken at the Tier 2 level of environmental review.





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September 24, 2007

Ms. Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

Re: Comments on the Placer Parkway Corridor Preservation Project Draft Tier 1  
EIS/Program EIR

Dear Ms. McAdam:

Thank you for providing our client, Placer Ranch, Inc. ("Placer Ranch"), an opportunity to comment on the Draft Tier 1/Program EIR for the Placer Parkway Corridor Preservation Project ("Draft EIS/EIR"). In the spirit of cooperation, we offer, on behalf of our client, the following comments regarding the Placer Parkway Corridor Preservation Project Draft EIS/EIR. In summary, we are concerned that the Draft EIS/EIR violates the requirements of the National Environmental Policy Act ("NEPA") and the California Environmental Quality Act ("CEQA") in that the document:

- fails to adequately define the purpose and need of the Project;
- improperly segments or piecemeals the Placer Parkway Project in a manner in which the Draft EIS/EIR fails to evaluate the project's impacts on surrounding land uses and planning efforts such as Placer Ranch;
- refuses to evaluate either as a part of the project or as a cumulative project the Placer Ranch proposed alignment of Placer Parkway;
- inaccurately describes the Placer Ranch Specific Plan and development time frames, omits an evaluation of impacts to the Placer Ranch Specific Plan, and intentionally defers the analysis of such impacts to a later date;
- dismisses the impacts associated with the "no development buffer" zone on the one hand, while relying on this buffer zone as mitigation for undefined impacts; and
- fails to evaluate cumulative impacts.

B-008-001

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**B-008-001**

The commenter provides information regarding the proposed Placer Ranch Specific Plan (PRSP), and expresses concern that the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR violates the National Environmental Policy Act and the California Environmental Quality for a variety of reasons that are responded to in responses to Comments B-008-002 through B-008-009.

**B-008-001**

1. Background on Placer Ranch Specific Plan

As you are aware, the Placer Ranch Specific Plan ("PRSP") is located in western Placer County, immediately north of the City of Roseville's northern boundary. The project site is included within the boundaries of the County's Sunset Industrial Area Plan ("SIAP") which was established by Placer County in 1997. The site is approximately one mile west of State Route 65/Sunset Boulevard interchange. The site is bisected by Fiddymont Road and bounded on the north by Sunset Boulevard West.

Since adoption of the SIAP in 1997, this area has been planned to support future manufacturing, business and high-tech industry jobs. Consistent with that vision, Placer Ranch is proposed as a mixed use community designed to support a new campus for the Cal State University system and to provide a job center with over 9 million square feet of commercial/industrial uses that will provide in excess of 20,000 jobs at buildout. Under the Specific Plan, Placer Ranch would involve the phased development of a mixture of industrial, commercial, office and professional, residential and educational land uses on approximately 2,213 acres to accommodate the growing population of western Placer County. A central feature of the Placer Ranch Specific Plan is the Sacramento State – Placer Campus located on 295.1 acres in the western portion of the Plan Area. The campus is designed to accommodate up to 25,000 full-time equivalent students with 1,584 student housing units and 156 faculty homes. A mixed use town center supporting residential and commercial land uses is proposed. Placer Ranch also includes approximately 4,589 dwelling units (not including university housing), 625 acres of office/professional and business park land uses and a second mixed-use town center, and parks, and open space. Additionally, roadway rights-of-way account for an approximate 380 acres within the Placer Ranch Specific Plan area.

**B-008-002**

Currently, Placer Ranch is engaged in the environmental review and entitlement process for the development of the Placer Ranch Specific Plan. Proposed development of the Specific Plan is expected to be complete before the year 2020, contrary to the assumptions contained in the Draft EIS/EIR that development of the PRSP will not occur before 2040 (p.3-4-7). Since 2002, Placer Ranch has invested considerable time, money and energy in the planning, design and environmental review processes associated with the development of the Placer Ranch Specific Plan. Placer Ranch commenced this process pursuant to the Board of Supervisors' direction:

"The Placer Parkway routing process must be considered concurrently with the planning for new development within the corridor being studied." [Placer County Board of Supervisors Minutes from October 20, 2003, p. 419; see also, e.g., Letter from SPRTA to George Phillips dated October 30, 2006].

Notwithstanding the ongoing Placer Ranch planning efforts, the Draft EIS/EIR identifies an eastern segment of the Placer Parkway Corridor which would extend through most of the northern portion of the Placer Ranch Specific Plan property. We find the extent of the proposed corridor surprising, because since February 2006, the Placer Ranch Specific Plan has been designed to accommodate necessary right-of-way for a 3.25 mile segment of the potential Placer Parkway which would travel east to west along the northern Placer Ranch boundary, and right-of-way for

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**B-008-002**

Please see the second paragraph of response to Comment B-001-002 and the first part of the response to Comment B-001-006 regarding development assumptions.

The Placer County Board of Supervisors did direct County staff to proceed with Parkway planning and processing private development proposals at the same time. Continuing to evaluate the Parkway project as proposed, including the no-development buffer, is not inconsistent with the Supervisors' action. The Parkway design has included a buffer since early planning stages. Potential conflicts with private development proposals do not mean that planning cannot proceed at the same time. Potential conflicts with private development proposals are not environmental impacts of the Parkway project and do not require mitigation other than that provided in Section 4.1.4.1 of the Draft Tier 1 EIS/EIR.

The Placer Parkway corridor in the vicinity of the PRSP was identified long before 2006, and a representative of the PRSP was a member of the Study Advisory Committee who was presented with this information as early as 2005, yet the planning for the PRSP did not consider this information. One of the reasons for pursuing a Tier 1 approach was, "so that the location of the future Placer Parkway can be considered in local jurisdictions' planning decisions" (page ES-3). A different alignment is not considered a reasonably foreseeable alignment just because it is proposed by an interested party. Nevertheless, Placer County Transportation Planning Agency (PCTPA) worked diligently with the developer regarding its proposed alignment, including participation in a meeting with federal agencies, and it is noted that the location of the suggested alignment was eventually withdrawn by the PRSP applicant.

**B-008-002**

interchanges anticipated at Fiddyment Road and at the Foothills Boulevard extension. Contrary to NEPA and CEQA, the Draft EIS/EIR fails to include this reasonably foreseeable alignment.

**B-008-003**

2. Lack of Coordination with Local Jurisdictions and Landowners

We commend the South Placer Regional Transportation Authority ("SPRTA") and Placer County Transportation Planning Agency ("PCTPA")<sup>1</sup> for your efforts to attempt to coordinate with affected agencies, landowners and organizations regarding the planning of the Placer Parkway Corridor Project. We understand that SPRTA and PCTPA conducted over 15 workshops or meetings with the Advisory Committee as part of this consultation effort.

Notwithstanding the purported coordination efforts, the Draft EIS/EIR fails to adequately address the concerns raised by Placer Ranch representatives during the Placer Parkway planning process, nor does the document reflect any effort to coordinate the two concurrent planning processes despite the Board of Supervisors' October 2003 direction. In this regard, SPRTA was well aware of the significant impacts that the eastern Placer Parkway Corridor would have on the PRSP, and the substantial impacts to the community supporting the new CSU campus, but the Draft EIS/EIR does not reflect an effort on the part of SPRTA to evaluate and minimize those impacts. Rather, the EIS/EIR indicates that SPRTA will figure them out later and in the meantime, the burden is on the PRSP to address impacts of Placer Ranch on a "to-be-determined" Placer Parkway alignment. Such an approach clearly does not demonstrate a willingness to collaborate.

We respectfully request that SPRTA take a hard look at the impacts the Parkway corridor will have on the PRSP, evaluate the Placer Ranch alignment, and identify avoidance and minimization measures to address such impacts on the Placer Ranch Project as discussed below.

**B-008-004**

3. Failure to Adequately Define Purpose and Need for the Proposed Action

The Draft EIS/EIR indicates on page ES-4 that the purpose of the Proposed Action is to preserve right-of-way for a new or upgraded east-west connector between SR 70/99 and SR 65 before an alignment is selected in Tier 2. According to the Draft EIS/EIR, planned and proposed development in the project vicinity may preclude opportunities for construction of a new or upgraded connector without the ability to preserve right-of-way for Placer Parkway.

While this purpose and need may apply to Placer Parkway segments outside of Placer Ranch, it no longer applies to the PRSP because the Specific Plan already reserved an area for Placer Parkway, and identified the area in which development may occur outside of that proposed alignment. Because Placer Ranch already incorporates into its specific plan a Placer Parkway alignment, the need for a full 500 to 1,000 foot corridor is not necessary. The Draft EIS/EIR, however, fails to include *any* analysis of the proposed Placer Ranch alignment for Placer Parkway, nor does it justify the identification of an up to 1,000 foot "no development buffer" zone through the Placer Ranch area, even though the Specific Plan incorporates the alignment. Accordingly, the

<sup>1</sup> Hereinafter, all references to "SPRTA" refer to SPRTA and SPRTA, unless otherwise noted.

**B-008-003**

There has been a substantial effort to coordinate the planning processes of the Parkway and the PRSP. Appendix A of the Draft Tier 1 EIS/EIR identifies meetings at which this specific issue was identified and discussed. Beginning in June 2006, numerous meetings were held with PRSP representatives and the Placer Parkway team to address various issues surrounding the PRSP planning efforts which did not conform to the alternatives being analyzed in the Draft Tier 1 EIS/EIR. These meetings included Placer County, engineering and environmental consultants, PCTPA, and sometimes the City of Roseville. In addition, the PRSP issues with regard to deviations from the Parkway alternatives were the subject of a special modified National Environmental Policy Act (NEPA)/404 meeting held on October 23, 2006 (meeting notes are included in Appendix A). Subsequently, the PRSP team modified a portion of their alignment to bring it more into conformity with the Parkway alignments, although issues relating to the size of the no-development buffer remained.

The PRSP process is suspended, and no further evaluation of the impacts of the Parkway on the PRSP is warranted because there is no more information to study.

**B-008-004**

Please see Master Response 1 for a discussion of the purposes of the no-development buffer.

No PRSP land use plan been approved by either Placer County or the City of Roseville. The PRSP process has been suspended, and no reanalysis is required.

B-008-004

Draft EIS/EIR should be revised and recirculated to analyze the proposed Placer Ranch alignment for the Placer Parkway and to reflect the revised project purpose and need.

4. The EIS/EIR must evaluate the PRSP Placer Parkway Alignment.

B-008-005

Placer Ranch proposes to reserve right-of-way for Placer Parkway as part of the Placer Ranch Specific Plan. This alignment would be within a 312 foot corridor and surrounded by development to the south of the parkway. This is a reasonably feasible alternative that must be evaluated in the EIS/EIR. (See 40 CFR 1502.14(a); 14 Cal Code Regs §15126.6.)

Further, given that an alignment is known and it is part of the improvements contemplated within the proposed Placer Parkway corridor, the EIS/EIR cannot piecemeal the analysis of the proposed Parkway. While it may be true that SPRTA may some day evaluate alternatives to other segments of Placer Parkway, SPRTA cannot ignore the fact a specific alignment currently exists as proposed by Placer Ranch, and that this alignment is a part of the Placer Parkway project. In other words, the proposed Placer Ranch alignment for the Parkway is also a reasonably foreseeable project under NEPA, the impacts of which should be evaluated in the EIS/EIR. (See e.g., 40 CFR 1508.25.) The Placer Parkway EIS/EIR should acknowledge that the PRSP alignment avoids impacts due to land use incompatibility and potential land use conflicts with Placer Ranch (a pending project). By contrast, a future eastern alignment through the PRSP area that is inconsistent with the Placer Ranch proposed alignment will result in significant environmental impacts to the planned development within Placer Ranch. With respect to impacts to wetlands and habitat, a comparison of the PRSP alignment for Placer Parkway with other practical alignments within the corridor results in less than a 0.10 acre difference in impact to wetlands within the Placer Parkway corridor. None of this information is contained in the Draft EIS/EIR in violation of CEQA and NEPA.

The Draft EIS/EIR should be revised and recirculated to include an analysis of the PRSP Placer Parkway alignment.

B-008-006

5. The Draft EIS/EIR fails to evaluate impacts to the PRSP.

The eastern corridor (with the "no development buffer" zone as proposed in the EIS/EIR) will severely impact the PRSP area. In conjunction with the proposed preservation corridor, this alignment could impede any development of the PRSP area. For example, the EIS/EIR states,

"All corridor alignment alternatives of the proposed Placer Parkway would bisect the PRSP area." (p. 4.1-21) . . . [a] bisected parcel is presumed to be adversely impacted" (p. 4.1-24).

Even before the Draft EIS/EIR was released, Placer Ranch representatives notified SPRTA of the need to consider the PRSP in the preparation of the Draft EIS/EIR. In that regard, Mr. James Moose stated on behalf of the PRSP representatives,

"Prudence therefore suggests that, in preparing the EIR/EIS for your project, you should treat the Placer Ranch project as a "given," and consider its location in determining the 'practicability' of any

**B-008-005**

Please see responses to Comments B-008-002 and B-008-004.

**B-008-006**

The Draft Tier 1 EIS/EIR evaluates the impacts of the Parkway on planned and proposed development at a Tier 1 level of detail, as is appropriate for corridor selection purposes. This is particularly appropriate for the PRSP, as all build alternatives would have similar impacts on the PRSP, which was not and is not an approved plan. The commenter quotes a PRSP representative as suggesting that the PRSP be treated as a "given." Considered in the context of the planned and proposed projects in the study area (please see Figure 1-15), this would require the Draft Tier 1 EIS/EIR to analyze specific impacts of many projects which have not yet undergone environmental review or project approval, and whose land use plans (if any) were speculative as to such approval. Please see the second paragraph of response to Comment B-001-002, and response to Comment B-007-003.

B-008-006

proposed Placer Parkway alignment.” (Appendix A, p4 of Moose comment letter.)

SPRTA, however, did not consider the location of the eastern alignment or the buffer zone in terms of the impacts associated with any proposed alignment through Placer Ranch. The Draft EIS/EIR indicates that SPRTA is aware of the problems associated with the eastern corridor and the impacts it would have to the PRSP, but the EIS/EIR dismisses these effects as Placer Ranch’s responsibility to address (see e.g., Draft EIS/EIR, pp. 3-10 – 3-13). Further, Chapter 4.1 acknowledges that all alternatives will have similar land use compatibility issues, but because there are no adopted plans for the PRSP, Brookfield and Reason Farms Master Plan update, the actual effects are not known. Moreover, the EIS/EIR states that it would be up to the development proposals to accommodate the corridor alignment selected, rather than for PCTPA and SPRTA to evaluate the impacts on the development proposals (see p. 4.1-36). This approach is in direct conflict with CEQA and NEPA requirements. (See e.g., *Kern v. U.S. Bureau of Land Management* 284 F.3d 1062, 1075 (9<sup>th</sup> Cir. 2002) quoting *Neighbors of Cuddy Mountain v. USFS* 137 F.3d 1372, 1379-80 (9<sup>th</sup> Cir. 1998) (“general statements about ‘possible’ effects and ‘some risk’ do not constitute a ‘hard look’ absent justification” regarding why definitive information could not be provided.))

We are surprised that SPRTA would choose to ignore available information from Placer Ranch and Placer County, such as the identification of potential environmental resources in the February 2006 Placer Ranch Notice of Preparation, that could have informed the Placer Parkway EIR/EIS analysis. We remain concerned that the Draft EIS/EIR defers the analysis of impacts and mitigation based on SPRTA’s own admission that it will determine land use impacts to Placer Ranch and other developments at a later date (see e.g., p. 4.1-28, 4.1-36). Such an approach clearly conflicts with the requirements of CEQA and NEPA. (See *Stanislaus Natural Heritage Project, Sierra Club v. County of Stanislaus* (1996) 48 Cal.App.4th 182; *Sundstrom v. County of Mendocino* 202 Cal. App. 3d 296, citing Pub.Resources Code § 21003.1, et. al; see also 1 Kotska & Zischke, Practice Under the Cal. Environmental Quality Act (Cont.Ed.Bar 1st ed. 2005) §15.41, p. 770 citing *Marin Mun. Water Dist. v. KG Land Cal. Corp.* (1991) 235 CA3d 1652, 1666 (“The lead agency should ordinarily respond to comments suggesting a new alternative that can substantially reduce significant project impacts by either explaining why further consideration of the alternative was rejected or providing an evaluation of the alternative.”; see also 42 USC §4332(E) (requiring the agency preparing the EIS to consider appropriate alternatives); 40 C.F.R. §1502.14(a) (requiring an EIS to “rigorously explore and objectively evaluate all reasonable alternatives”) *Bob Marshall Alliance v. Hodel* 852 F.2d 1223, 1225 (9<sup>th</sup> Cir. 1988) (NEPA “requires that alternatives . . . be given full and meaningful consideration.”).) This is not a case where the information relevant to the analysis of reasonable foreseeable significant adverse effects to the human environment is incomplete or unavailable; rather the information exists as described above and it is essential to a reasoned choice regarding a future Placer Parkway alignment (see e.g., 40 CFR § 1502.22).

For these reasons, we request that SPRTA evaluate and quantify in the Draft EIS/EIR the impacts to existing and proposed land uses, wetlands and other biological resources, the loss of agricultural resources, and impacts to transportation and circulation among other categories of

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B-008-006

effects. Additionally, the EIS/EIR should evaluate PRSP's proposed alignment within the eastern corridor of Placer Parkway, and propose mitigation measures in order to avoid and minimize impacts to Placer Ranch and the existing natural resources.

B-008-007

6. The EIS/EIR Fails to Adequately Evaluate the No Development Buffer Zone.

The Draft EIS/EIR indicates that the purpose of the Tier 1 analysis is to "preserve right-of-way for a new or upgraded east-west connector between SR 65 and SR 70/99" (p1-8). According to the EIS/EIR, "[t]he Proposed Action for the Placer Parkway Corridor Preservation Project is to select and preserve a 500- to 1,000-foot-wide corridor in the project study area" (p3-3) and the Draft EIS/EIR refers to the "No Development Buffer" at a variable width between 500-to 1,000-foot-wide.

The Draft EIS/EIR further describes the purpose of the "No-Development Buffer" as a "corridor that is wider than what is needed for the proposed roadway, with lands on one or both sides of the facility" which would be intended to further a parkway concept that maintains and preserves open space, protects biological resources, prevents future development encroachment, and limits access to the Parkway as defined in Section 2.2.4.1. The Draft EIS/EIR further states that "[s]ince the value of the no-development buffer zones to maintain the parkway concept and limit access depends to some extent on the adjacent land uses, it may be appropriate to adjust the final size and shape of the buffer based on Tier 2 analysis of the Parkway." (§2.2.41 at p. 2-9) Although the Draft EIS/EIR indicates it may be appropriate to adjust the final size and shape of the buffer based on the Tier 2 analysis of the parkway, the Draft EIS/EIR is unclear as to whether the entire corridor width will be preserved prior to selection of a preferred alignment. The Draft EIS/EIR should be revised and recirculated to clarify that the entire corridor is not necessary for the alternatives under evaluation.

The Draft EIS/EIR fails to evaluate the environmental impacts associated with acquisition and/or preservation of the entire corridor in advance of selection of a preferred alignment for Placer Parkway. Moreover, no information or analysis is provided to support the need for the entire corridor width for all of the alternatives, particularly, since SPRTA has yet to identify a preferred alignment. The Draft EIS/EIR should be revised and recirculated to provide this analysis.

Placer Ranch is particularly concerned with the size of the proposed corridor along the proposed eastern alignment. If, in fact, SPRTA intends to preserve a blanket 1,000 foot wide corridor along the Placer Parkway corridor, it will virtually freeze the developable land of the PRSP area and certainly will affect many other development plans currently undergoing review and approval within the area. Such an approach conflicts with Placer County Board of Supervisor's directive that the Placer Parkway Project be processed concurrently with the PRSP and other planning efforts. Therefore, SPRTA must consider significantly reducing the size of the corridor, if for no other reason than to avoid and mitigate the environmental impacts to the pending Placer Ranch project. Since the Board of Supervisors directed Placer Ranch and other development efforts to proceed concurrently, SPRTA cannot shift its obligations to evaluate impacts under CEQA and NEPA to another project that will be impacted by the proposed action. (See *Kern* 284 F.3d at 1075 (holding that "[i]t is not appropriate to defer consideration of cumulative impacts to a future date

**B-008-007**

Please see Master Response 1 for a general discussion of the purpose of the no-development buffer, and response to Comment L-010-001 regarding Tier 2 analysis with respect to the buffer.

The Draft Tier 1 EIS/EIR does in fact analyze the entire corridor for each of the five corridor alignment alternatives, and conservatively considers that the entire corridor would be impacted, as well as the fact the actual roadway could be located anywhere within that corridor. No revision to the Draft Tier 1 EIS/EIR is required.

Please also see responses to Comments B-008-002 and B-008-006 regarding the Placer County Board of Supervisors' direction, and the environmental impacts of the buffer on the PRSP, respectively.

**B-008-007** when meaningful consideration can be given now”); 42 USCA §4332; 40 CFR §§1508.7, 1508.25(a), 1508.27(b)(7); see also 40 CFR 1502.22 (requiring an EIS where there is incomplete or unavailable information to include a summary of existing credible evidence and evaluate the impacts based upon theoretical approaches or generally acceptable scientific research methods); *Scientists’ Institute for Public Information, Inc., v. Atomic Energy Commission* 481 F.2d 1079, 1092 (D.C. Cir. 1973) (“reasonable forecasting and speculation is thus implicit in NEPA”).

**B-008-008** 7. The Draft EIS/EIR Fails to Adequately Evaluate Cumulative Impacts

As the Draft EIS/EIR acknowledges, many pending and reasonably foreseeable cumulative projects are under review throughout Placer County and Sutter County (see e.g., pp. 1-32 – 1-35). Many of these development efforts have been underway for decades. Nonetheless, the Draft EIS/EIR only acknowledges the list of cumulative projects, but fails to evaluate the combined impacts of past, present and reasonably foreseeable development within the study area in accordance with CEQA and NEPA. (See Pub. Res. Code §21083(b)(2); *Kern*, 284 F.3d at 1075; *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397.) Here, Placer Ranch is a reasonably foreseeable future project and as such there are reasonably foreseeable consequences of project approval of the Parkway as cumulatively considered with Placer Ranch. (*Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal.App.4<sup>th</sup> 712, 738; *Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376; *O’Reilly v. USACE* 477 F.3d 225 (5<sup>th</sup> Cir. 2007) (requiring agency to include “reasonably foreseeable” future actions in its review).

The Draft EIS/EIR acknowledges that the Placer Parkway in conjunction with other cumulative projects in the vicinity would result in significant undefined cumulative impacts. (See 40 C.F.R. §1508.7 (2000) (Defining cumulative impact as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.”).) In many instances, however, the EIS/EIR fails to quantify the cumulative impacts. For example, although the Draft EIS/EIR indicates on page 4.14-32 that the Placer Parkway project would occupy approximately 500 to 600 acres, and additional development anticipated by 2040 would “reduce and fragment remaining habitats within Sutter County and western Placer County substantially,” the EIS/EIR fails to describe the specific impacts. The Draft EIS/EIR should describe the specific impacts to wetlands, special-status species and their habitats, and the amount of acreage that would be fragmented by Placer Parkway and cumulative projects.

**B-008-009** 8. The EIS/EIR improperly considers the “No Development Buffer” as mitigation.

Throughout the Draft EIS/EIR, SPRTA assumes that the “no development buffer” zone for a future undetermined corridor alignment will minimize and mitigate impacts caused by Placer Parkway. For example, the EIS/EIR assumes there are no impacts to land uses, agricultural resources and other biological environmental resources because of the existence of a no-development buffer zone (see e.g., p. 4.1-44; Section 4.13.6). Later, the Draft EIS/EIR proposes the same “no-development buffer” zone to mitigate impacts from the future Placer Parkway alignment on open space and agricultural uses adjacent to the Parkway (see, p. 4.1-44). By contrast, no mitigation is

**B-008-008**

The Draft Tier 1 EIS/EIR evaluates the potential contribution of the Parkway to the cumulative combined impacts of other past, present, and reasonably foreseeable future projects within two scenarios that are intended to bracket potential future regional development levels between 2020 and 2040. These scenarios are described in more detail in Section 3.4 of the Draft Tier 1 EIS/EIR. Please see also response to Comment B-002-008. The 2040 scenario assumes the implementation of the Placer Ranch Specific Plan, and provides a general analysis of impacts at the highest projected level of future regional development.

The analysis of cumulative environmental impacts in the Draft Tier 1 EIS/EIR reflects the 2040 scenario and provides appropriate detail for a Tier 1 project. Project-specific analysis of impacts will be undertaken at the Tier 2 level of environmental review. Please also see response to Comment B-008-006.

**B-008-009**

Although the Draft Tier 1 EIS/EIR included the no-development buffer zone as part of the project description, it did not assume any environmental benefits. The buffer is not intended to provide mitigation for adverse environmental impacts from the project. The discussion on page 4.1-44 of the Draft Tier 1 EIS/EIR explains that the buffer zone is part of the effort to avoid land use conversions, including parcel bisection. It is not intended to serve as mitigation for any conversion impact that the Parkway may cause. The discussion of the buffer is similar in other sections of the Draft Tier 1 EIS/EIR.

As explained in Section 3.4.1 of the Draft Tier 1 EIS/EIR, the environmental analysis is conducted using a baseline of existing conditions, as well as forecasts of future conditions at several stages. The assumptions regarding future land uses were made based on adopted city and county plans and related planning processes.

Ms. Celia McAdam  
September 24, 2007  
Page 8

B-008-009

identified for impacts to the future development which is already contemplated within the "no development buffer" zone; instead, the EIS/EIR indicates that SPRTA will later determine specific impacts and specific mitigation as part of Tier 2 (see p. 4.1-47). To compound the confusion, the EIS/EIR is inconsistent in its treatment of the "no-development buffer" zone because in other sections, the EIS/EIR indicates that the buffer zone may be reduced depending on a future specific alignment based on performance standards (see e.g., p. 2-9).

Similarly, Section 4.2 of the Draft EIR/EIS indicates that Alternatives 1 through 5 may have significant socioeconomic and community impacts associated with disruption of the existing community and that the Parkway would have a cumulatively considerable contribution to the implementation of planned land use changes. However, there is no analysis of Parkway's impacts on the proposed PRSP land uses. The Draft EIS/EIR relies on a similar approach for the evaluation of visual/aesthetic impacts in Chapter 4.6, and impacts to biological resources in Chapter 4.14.

Given the inconsistent approach to the "no development buffer" zone, the EIS/EIR should be revised and recirculated to address the impacts to reasonably foreseeable development. In addition, the EIS/EIR should consider alternatives to a 500-foot to 1,000-foot buffer, particularly in those instances, such as Placer Ranch, where such a buffer width cannot be justified. If SPRTA intends to rely on a "no development buffer" zone, then it must define the performance standards which will be applied in Tier 1, and evaluate as part of the corridor preservation project, the impacts and mitigation measures to surrounding land uses.

We appreciate the opportunity to review and comment on the Draft Tier 1 EIS/EIR. Based on our review, we respectfully request that SPRTA substantially revise and recirculate the EIS/EIR to evaluate the Placer Ranch alternative for the Placer Parkway Corridor alternative and provide further analysis of the Placer Parkway impacts and mitigation measures to avoid and minimize impacts to the Placer Ranch Project. Placer Ranch remains interested in working with SPRTA to develop an alignment for Placer Parkway that offers a "win-win" situation for the County, the agencies and Placer Ranch. Please feel free to contact us if you have any questions or need further assistance.

Very truly yours,



Alicia Guerra

ACG/clf

cc: John Sprague, City of Roseville  
Mark Morse, City of Roseville  
Kathy Pease, City of Roseville  
Holly Tiche  
Eric Bryant  
George Phillips

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RECEIVED

JUL 30 2007

P.C.T.P.A.

MEMORANDUM FOR: Rodney F. Weiher  
NOAA NEPA Coordinator

FROM: David Zilkoski  
Director, National Geodetic Survey

SUBJECT: **DEIS Regarding 0707-08: Tier 1--Placer Parkway Corridor Preservation Project, Select & Preserve a Corridor for the Future Construction from CA-70/99 to CA 65, Placer & Sutter Counties, CA (20070278)**

The DEIS has been reviewed within the areas of the National Ocean Service (NOS) responsibility, expertise, and in terms of the impact of the proposed actions on NOS activities and projects.

F-001-001

If there are any planned activities which will disturb or destroy geodetic control monuments, NOS requires notification not less than 90 days in advance of such activities in order to plan for their relocation. NOS recommends that funding for this project includes the cost of any required relocation(s).

All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the National Geodetic Survey's home page at the following Internet address: <http://www.ngs.noaa.gov> After entering this website, please access the topic "Products and Services" then "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the National Geodetic Survey database for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

For further information about geodetic control monuments, please contact:

Christopher W. Harm  
Program Analyst  
NOAA's National Geodetic Survey  
Office of the Director  
1315 East-West Highway  
SSMC3 8729, NOAA, N/NGS  
Silver Spring, Maryland 20910

Voice: (301) 713-3234 ext. 155  
Fax: (301) 713-4175  
Email: [chris.harm@noaa.gov](mailto:chris.harm@noaa.gov)

#### F-001-001

The process of environmental review undertaken for the preparation of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR is intended to identify potential direct and indirect impacts, such as noise or air pollution, that could adversely affect communities in the study area. These potential impacts are described in the Draft Tier 1 EIS/EIR, along with general mitigation strategies that could be employed to reduce or avoid such impacts. As this evaluation has been undertaken at the Tier 1 level, the analysis is focused on the identification of impacts at a broad and general level of detail. At the Tier 2 stage, once roadway alignment alternatives have been identified within the selected corridor, more detailed analyses of impacts will be undertaken to focus on a narrower geographical area and identify specific impacts at a more local level. The Tier 2 document will identify measures, such as adjustment of the alignment of the roadway within the selected corridor or implementation of mitigation measures to minimize resultant impacts. At that time, the location of all relevant geodetic control monuments will be identified and the National Ocean Service will be notified in accordance with their requirements. If required, the appropriate geodetic control monuments will be relocated prior to construction as part of the project.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 75 Hawthorne Street  
 San Francisco, CA 94105-3901

September 25, 2007

Gene Fong  
 Division Administrator  
 Federal Highway Administration  
 650 Capitol Mall, Suite 4-100  
 Sacramento, CA 95814

Subject: Draft Tier 1 Environmental Impact Statement/Environmental Impact Report  
 for the Placer Parkway Corridor Preservation Project (CEQ #20070278)

Dear Mr. Fong:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document. We understand that for this project, responsibilities for complying with the National Environmental Policy Act (NEPA) remain with the Federal Highway Administration (FHWA) and are not delegated to the State of California in the pilot program for NEPA delegation. Placer Parkway is identified as an "exception" project in the *Memorandum of Understanding (MOU) Between the FHWA and Caltrans Concerning the State of California's Participation in the Surface Transportation Project Delivery Pilot Program (June 2007)*. Our enclosed detailed comments were prepared pursuant to the NEPA, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act.

This project is following the NEPA/Clean Water Act Section 404 Integration Process MOU (NEPA/404 MOU), as modified for Tier 1 projects, so that decisions made in Tier 1 are consistent with the requirements of Clean Water Act (CWA) Section 404 permitting at the end of the Tier 2 project. We commend FHWA, Caltrans, and the South Placer Country Regional Transportation Authority for engaging in this collaborative approach at Tier 1 and for your responsiveness to EPA's input throughout the NEPA/404 MOU process.

Based on our review of the Draft Environmental Impact Statement (DEIS), we have rated the build alternatives as Environmental Concerns-Insufficient Information (EC-2). Please see the enclosed Summary of EPA Rating Definitions. EPA's major area of concern is the analysis of indirect (secondary) impacts of the Parkway, including potential growth-inducing impacts to aquatic resources, special status species, and biological habitat.

We are particularly concerned that the DEIS lacks a robust qualitative description and quantitative estimates of the Parkway's potential indirect impacts, including effects on sensitive resources due to growth inducement and habitat fragmentation. The DEIS appears

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**F-002-001**

The commenter's concerns regarding insufficient information with respect to the analysis of indirect (secondary) impacts of the Parkway were addressed in the Placer Parkway Partially Revised Draft Tier 1 EIS/EIR (PRD), and in subsequent meetings with the commenter and other federal agencies, as summarized in Appendix A. The federal resource agencies have agreed that Alternative 5 with a no access buffer is the corridor most likely to contain the Least Environmentally Damaging Practicable Alternative (LEDPA).

The commenter provided a summary of U.S. Environmental Protection Agency Rating Definitions and a copy of the Parkway National Environmental Policy Act (NEPA)/404 Memorandum of Understanding. Receipt of these documents is acknowledged.

**F-002-002**

The Draft Tier 1 EIS/EIR includes the analysis of secondary and indirect impacts in all resource categories evaluated within the environmental review process (Sections 4.1 to 4.16 of the Draft Tier 1 EIS/EIR). This analysis includes an analysis of potential indirect impacts on biological resources appropriate for a Tier 1 level evaluation. With respect to potential growth inducement associated with the Parkway and secondary and indirect impacts, the Draft Tier 1 EIS/EIR includes a robust analysis in Section 6.1. This analysis conforms to all parameters recommended for consideration by Caltrans and by the Mare Island interagency working group (of which U.S. EPA is a participant) (*Guidance for Preparers of Growth-Related, Indirect Impact Analyses* (Mare Island Accord, 2006)), as well as a qualitative evaluation using MEPLAN, an integrated land use transportation model that forecasts the influence of transportation conditions on local land use development and the impacts of local land use development on transportation conditions. MEPLAN was used in the Sacramento Area Council of Governments (SACOG) Blueprint project, and was approved for use in the Draft Tier 1 EIS/EIR

F-002-003

F-002-004

to exclude from analysis the indirect impacts of the planned and potential additional interchanges, such as the Watt Avenue interchange. Finally, the DEIS does not demonstrate how the "no-development buffer concept" will be implemented to prevent additional interchanges on the Parkway and to prevent near roadway development.

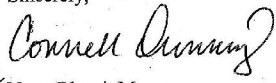
F-002-005

The enclosed detailed comments also provide recommendations related to the following: 1) cumulative impact analysis, 2) hydrology, floodplains, and water quality, 3) air quality, and 4) the hypothetical Land Use and Policy (smart growth) Scenario.

The next steps in the modified NEPA/404 MOU process are the following: 1) select the corridor(s) most likely to contain the "least environmentally damaging practicable alternative (LEDPA)," the only alternative that can be permitted under CWA Section 404, and 2) determine the general mitigation framework for the project. The CWA Section 404 (b)(1) guidelines require consideration of direct, secondary (indirect), and cumulative impacts when determining the LEDPA. We would like to offer our assistance to work with you on these NEPA/404 checkpoints.

We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact me or Nancy Levin, the lead reviewer for this project. Nancy can be reached at 415-972-3848 or levin.nancy@epa.gov.

Sincerely,

  
For Nova Blazej, Manager  
Environmental Review Office

Enclosures:

Summary of EPA Rating Definitions

EPA's Detailed Comments

NEPA/Clean Water Act Section 404 Integration Process MOU Modified for Tier 1 (2004)

cc:

Celia McAdam, South Placer Regional Transportation Authority

Katrina Pierce, California Department of Transportation

Tom Cavanaugh, U.S. Army Corps of Engineers

Ken Sanchez, U.S. Fish and Wildlife Service

John Baker, National Marine Fisheries Service

Jeff Finn, California Department of Fish and Game

by U.S. EPA and the USCOE. The MEPLAN Technical Report (DKS, 2007) is included in the Draft Tier 1 EIS/EIR by reference and is summarized on pages 6-7 and 6-8. After receiving the commenter's letter and discussing it at length in a meeting with U.S. EPA and USCOE, FHWA and SPRTA undertook additional analysis following publication of the Draft Tier 1 EIS/EIR. These analyses were included in the PRD, and are described in Master Response 1.

**F-002-003**

The Draft Tier 1 EIS/EIR includes the analysis of all interchanges proposed as part of the project in the environmental analysis. These interchanges are described in Section 2.2.3 of the Draft Tier 1 EIS/EIR. Additional analysis of a potential future interchange with a future extension of Watt Avenue, which is not part of the project, is also provided in Chapter 7 of the Draft Tier 1 EIS/EIR. This analysis was intended to disclose any potential, reasonably foreseeable, effects of the Parkway if the Parkway design was modified in the future to include a potential Watt Avenue interchange. Such an interchange would be subject to independent future environmental review, and the inclusion of this hypothetical interchange does not predetermine the construction or the alignment of a future Watt Avenue interchange or extension.

**F-002-004**

Please see Master Response 1 regarding the effect of the no-development buffer and mechanisms to implement it.

**F-002-005**

Please see responses to Comments F-002-006 through F-002-020. The next steps in the modified NEPA/404 process identified by the commenter are noted, and the transportation agencies (FHWA, Caltrans, and SPRTA) welcome U.S. EPA's assistance in completing this process. Please see Chapter 2 for an update of this process.

EPA'S DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE TIER 1 PLACER PARKWAY CORRIDOR PRESERVATION PROJECT IN PLACER AND SUTTER COUNTIES, CALIFORNIA. SEPTEMBER 25, 2007

### **Section I: Integration of Clean Water Act and National Environmental Policy Act Requirements**

The Federal Highway Administration (FHWA) and the South Placer Regional Transportation Authority (SPRTA), the project sponsor, are using a tiered process for the National Environmental Policy Act (NEPA) analysis of the proposed Placer Parkway project. The goal for this Tier 1 (programmatic) Environmental Impact Statement (EIS) is to identify a corridor for future right-of-way preservation. The Tier 2 (project-level) EIS will identify a specific alignment for the Parkway within the corridor(s) identified in Tier 1. After Tier 2 project approval, but before project construction, the project proponent will need to obtain a Clean Water Act (CWA) Section 404 individual permit from the Corps.

The CWA Section 404(b)(1) Guidelines (Guidelines) are binding, substantive regulations that restrict CWA Section 404 permits to the "least environmentally damaging practicable alternative (LEDPA)." The Corps cannot grant a CWA Section 404 permit to a preferred project-level alternative that is not the LEDPA; therefore, it is critical that the LEDPA is not prematurely eliminated during the Tier 1 NEPA review.

In 2004 the FHWA, California Department of Transportation (Caltrans), the Placer County Transportation Planning Agency (on behalf of SPRTA), U.S. Army Corps of Engineers, and U.S. EPA Region IX agreed to follow a NEPA/CWA Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU) – modified for Tier 1 decision making – as the framework to guide the environmental review of the programmatic, Tier 1 Placer Parkway project.<sup>1</sup> The goal of the modified NEPA/404 MOU process is to ensure that Tier 1 decisions reflect careful consideration of the Guidelines. The Guidelines should be addressed as early as possible in the Tier 1 NEPA evaluation to eliminate the need to revisit decisions at the Tier 2 project-level that might otherwise conflict with CWA 404 permit requirements.

EPA has agreed with the first three checkpoints in the NEPA/404 MOU process – the purpose and need, criteria for selecting the range of alternatives, and the range of alternatives. The next steps in the process are the following: 1) select the corridor(s) most likely to contain the "least environmentally damaging practicable alternative (LEDPA)" and 2) determine the mitigation framework for the project.

F-002-006

#### **Corridor(s) Most Likely to Contain the LEDPA**

The Guidelines call for an analysis that compares the total impact – direct and secondary (indirect) – for each alternative. However, the Draft Environmental Impact Statement (DEIS) only includes direct impacts in the comparison of alternatives (e.g., Table 4.14-4). It is important to include indirect, including growth-inducing impacts, in the alternatives

<sup>1</sup> Modified NEPA/404 MOU Integration Process for the Tier 1 Placer Parkway Corridor Preservation Project, April 12, 2004.

F-002-006

analysis, because an alternative with greater direct impacts, but fewer indirect impacts (including growth-related impacts) can qualify as the LEDPA.<sup>2</sup>

**Recommendation**

In order to be consistent with the Guidelines, the alternatives analysis should compare the alternatives using both direct and indirect impacts to environmental resources of concern. Specific recommendations are included below in **Section II-A**.

F-002-007

In addition, when evaluating differences between each corridor, it is important to consider resource avoidance options (e.g., elevated structures, bottomless culverts) that are available *within* each corridor, so as to not prematurely eliminate a potential LEDPA alignment.

**Recommendation**

Include planning-level avoidance commitments in the Tier 1 Final EIS (FEIS) for each alternative that will be considered in the LEDPA assessment, such as arched (bottomless) culverts and elevated roadway structures or spans.

F-002-008

Finally, given the magnitude of potential resource impacts, particularly to aquatic resources, species, and habitat, we recommend that FHWA prepare a robust cumulative impacts analysis at Tier 1 that will 1) determine the resource study area for and the baseline condition of each resource of concern, 2) assess reasonably foreseeable changes to environmental resources over time, and 3) identify potential landscape-level mitigation opportunities.

**Recommendation**

Prepare a thorough cumulative impact analysis to sensitive resources affected by the project. Specific recommendations are included below in **Section II-B**.

F-002-009

**Mitigation Framework**

In the Tier 1 FEIS, FHWA should present the framework it will use to prepare the Tier 2 project-level detailed mitigation plan. The Tier 1 mitigation framework describes the processes that FHWA will use, and commitments it will make, to maximize opportunities for successful mitigation of environmental impacts associated with the construction and operation of the Parkway, including long-term mitigation and management of resources.

**Recommendations**

Identify the following in the Tier 1 FEIS mitigation framework:

- Mitigation options available for creation, restoration, enhancement and preservation (e.g., land dedication, acquisition of conservation easements, in lieu fees for acquisition, mitigation banks).
- Potential mitigation sites.

<sup>2</sup> See Chapter 2.3, Guidance for Preparers of Growth-related, Indirect Impact Analyses. [http://www.dot.ca.gov/set/Growth-related\\_IndirectImpactAnalysis/gri\\_guidance.htm#cwadef](http://www.dot.ca.gov/set/Growth-related_IndirectImpactAnalysis/gri_guidance.htm#cwadef)

**F-002-007**

The Draft Tier 1 EIS/EIR provides conceptual descriptions of roadway design features that would be incorporated into the Parkway to avoid resource impacts. These are provided in Section 2.2.2. Each resource impact analysis section (Sections 4.1 through 4.16) also includes a discussion of mitigation commitments and considerations that will be further developed during Tier 2 and that include design features and strategies to avoid resource impacts.

**F-002-008**

The Draft Tier 1 EIS/EIR includes the analysis of cumulative impacts in all resource categories evaluated within the environmental review process (Sections 4.1 to 4.16). This analysis takes into account potential cumulative impacts on aquatic and biological resources appropriate for a Tier 1 level evaluation. With respect to potential growth inducement associated with the Parkway and cumulative impacts, including habitat fragmentation, that could occur as a result of such growth, additional analysis was undertaken following publication of the Draft Tier 1 EIS/EIR. This additional analysis is presented in the PRD, which was circulated for public comment on January 30, 2009.

**F-002-009**

The Draft Tier 1 EIS/EIR presents a framework for a detailed mitigation plan to be developed in the Tier 2 stage. At the end of each section in Chapter 4, the last section is "Avoidance, Minimization, and/or Mitigation Measures." Within this section are individual subsections identifying Tier 1 avoidance and minimization strategies, as well as mitigation consultation, commitments, and considerations for the Tier 2 level of analysis.

Many of the specific items identified by the commenter are included in the Draft Tier 1 EIS/EIR, at a level appropriate for a Tier 1 level of analysis. Please see, for example, pages 4.14-34 through 4.14-36.

F-002-009

- Opportunities to build upon existing or planned conservation efforts and to coordinate with other governmental and non-governmental agencies.
- Habitat types and approximate acres of impact. Special status species and critical habitat impacted. Discussion of buffer areas and habitat linkages that will be adversely affected and replaced.
- Institutions and instruments (e.g., established maintenance endowments) for long-term management of mitigation sites.

## Section II: Indirect and Cumulative Impacts Analysis

F-002-010

### A. Indirect and Induced Growth Impacts

The proposed Placer Parkway is a major new freeway in a rural area with abundant aquatic and biological resources, and large areas of undisturbed habitat. The DEIS recognizes that the proposed project will not only have significant direct impacts on these resources, but also that the project will be growth-inducing in southwestern Placer County and southern Sutter County. The growth-inducement associated with the Placer Parkway will likely have significant adverse impacts to sensitive aquatic and biological resources, including habitat.

We commend FHWA for the recognition of indirect impacts, particularly growth inducement, as a major issue for the project, and for FHWA's objective to avoid unplanned growth in environmentally sensitive areas. EPA is concerned, however, that the DEIS does not contain an estimate, by alternative, of indirect impacts to sensitive environmental resources; and does not sufficiently describe and commit to measures that avoid and minimize growth-inducing impacts.

EPA also has major concerns about the assumption, used throughout the DEIS, that the "no-development buffer concept" will prevent interchanges additional interchanges on and growth near the Parkway.

#### i. Methodology and Scope of Analysis of Indirect Impacts

The DEIS concludes that the project will be growth-inducing. The next step in the indirect impact analysis is to assess the impacts to resources of concern and compare them by alternative. Caltrans has recently completed guidance, in concert with EPA and FHWA, to analyze growth-inducing indirect impacts of projects. We recommend using this guidance to determine the anticipated location of and quantify growth-inducing impacts the Final EIS.

The DEIS states that it is "not feasible to perform a detailed quantitative evaluation of these [indirect and secondary] potential impacts as specific design details of other future projects are not known," and that the effects are evaluated qualitatively. EPA believes that a more detailed qualitative and quantitative analysis of indirect impacts, especially induced growth impacts, to resources of concern can be provided in the FEIS. Detailed information exists for several major developments in the study area, including CWA jurisdictional delineations for Placer Vineyards, Curry Creek, Placer Ranch, and Sierra Vista specific plans. Additional delineations may be available prior to the FEIS. Placer

Detailed mitigation commitments described by the commenter are not appropriate at this time because the extent and magnitude of the potential impacts are not completely known. Additional design details and resources inventories will be required to determine the appropriate mitigation commitments in consultation with federal and state resource agencies. Biological resource mitigation would be implemented as described in Section 4.14.4. Commitments to exact ratios during the Tier 2 process would be based on a detailed assessment of the characteristics of the impacts, the current value of the affected resources, and the types of available mitigation opportunities.

### F-002-010

The Draft Tier 1 EIS/EIR includes the analysis of secondary and indirect impacts in all resource categories evaluated within the environmental review process (Sections 4.1 to 4.16), including an analysis of potential indirect impacts on aquatic and biological resources appropriate for a Tier 1 level evaluation. With respect to potential growth inducement associated with the Parkway, and secondary and indirect impacts, including habitat fragmentation, that could occur as a result of such growth, these analyses are also included in Sections 4.1 through 4.16 and 6.1. Additional analyses on these topics were undertaken following publication of the Draft Tier 1 EIS/EIR.

This additional analysis, which is presented in the PRD, used the referenced Caltrans guidance within the analysis methodology. It also included updated information for major developments in the area, quantitative estimates for indirect impacts for each alternative, and maps that overlay areas of planned, proposed, and approved growth onto aquatic and terrestrial resources.

This analysis did not change the conclusions in the Draft Tier 1 EIS/EIR that there is little difference in the potential for growth among the build alternatives, nor did it change the conclusions related to indirect impacts.

F-002-010

County and other agencies have compiled detailed information on resources in the area that is readily available in a Geographical Information System (GIS) format.

The DEIS states that it is unlikely that the growth-inducing impacts of the project would differ from one alternative to another (Section 6.1.4) but does not provide data to support this conclusion. The potential growth-inducing impacts of the alternatives could vary significantly, depending on the location of the corridor, the interchanges, and their proximity to existing development. The northerly alternatives provide access to largely undeveloped areas facing intense development pressures, including areas around Sunset Boulevard West. The southerly routes provide access closer to existing and planned urban development. Corridor alternatives and interchange locations that direct growth to southern rather than northern areas of Western Placer County would likely have fewer growth-related impacts to environmental resources and result in less habitat fragmentation.<sup>3</sup>

**Recommendations**

Prepare a robust qualitative and quantitative analysis of indirect impacts -- including habitat fragmentation and growth-related impacts to environmental resources -- for each alternative, and provide supporting data:

- Use readily available quantitative information, such as Geographical Information System (GIS) databases and verified CWA delineations to prepare a quantitative estimate of secondary and indirect impacts. Include information from jurisdictional delineations for Placer Vineyards, Curry Creek, Placer Ranch, and Sierra Vista specific plans. Additional delineations may be available prior to the FEIS. Placer County and other agencies have compiled detailed digitized resource information in the area that is readily available.
- Use the Caltrans' Growth Related Indirect Impacts Guidance to analyze the potential growth-inducing impacts of the project and to compare alternatives. It is available at [http://www.dot.ca.gov/ser/Growth-related IndirectImpactAnalysis/gri\\_guidance.htm](http://www.dot.ca.gov/ser/Growth-related%20IndirectImpactAnalysis/gri_guidance.htm).
- Present a quantitative estimate of indirect impacts on each alternative in tabular form in Table ES-1. Also, provide a map overlaying aquatic and terrestrial resources and habitat boundaries with areas of existing and anticipated (planned and reasonably-foreseeable) growth.

F-002-011

ii. Implementation of a "No-Development Buffer Concept"

FHWA has proposed a 500-1,000 foot "no-development buffer concept" to prevent development and additional interchanges along the Placer Parkway. The DEIS states that this buffer would severely constrain growth-inducement from the Parkway project by preventing new access on the freeway, beyond the four to five planned interchanges. EPA

<sup>3</sup> For information on how the location of a transportation facility can influence and direct growth, see Chapter 5, Guidance for Preparers of Growth-related, Indirect Impact Analyses; National Cooperative Highway Research Program (NCHRP) Report 423A, Land Use Impacts of Transportation: A Guidebook; and NCHRP Report 466, Desk Reference for Estimating the Indirect Effect of Proposed Transportation Projects.

Please also see Master Response 1.

F-002-011

Please see Master Response 1 regarding the effect of the no-development buffer.

Section 2.2.4 does not indicate that adjustments that may be made to the no-development buffer at the Tier 2 stage would allow development to the edge of the roadway, and in any event, so long as access to the Parkway is precluded by even a small buffer, access would be precluded.

The list of potential land use controls in the Draft Tier 1 EIS/EIR presents a range of feasible measures to implement a no-development buffer that could control access to the Parkway. Please see Chapter 2 and Appendix A of this Final Tier 1 EIS/EIR for specific provisions regarding easement language focusing on reducing the potential for growth inducement. The commenter's identification of environmental benefits of the buffer is noted.

The boundaries of the Central Segment were shifted for the Draft Tier 1 EIS/EIR to include the portion of the corridor that was common to all alternatives in the Western Segment, for streamlining and simplification of the analysis. However, contrary to the commenter's assertion, there is no portion of the corridor alignments in any of the three segments that is not subject to a no-development buffer, save for the proposed interchanges. Additionally, the size of the proposed corridor remains as previously identified—500 feet to Fiddymont Road, and 1,000 feet west of Fiddymont Road to Pleasant Grove Road, regardless of the change in the segment locations.

believes that the DEIS has not demonstrated that the “no-development buffer concept” would prevent additional interchanges and development within 500-1,000 feet of the roadway.

First, the DEIS states that “adjustments” to the buffer could be made at Tier 2 to accommodate “future approved development.” These adjustments would allow development to the edge of the roadway (Section 2.2.4). In addition, the buffer could be created on just one side of the parkway, leaving the other side available for near roadway development. Given these qualifications to the buffer concept, EPA believes it is misleading to state that the buffer would prevent development near the roadway.

Second, the DEIS does not include assurances that the buffer would be successful in preventing additional interchanges and development near the roadway. The DEIS does not include an implementation plan or timeframe for adopting, implementing, and ensuring long-term effectiveness of a buffer. While the DEIS contains a list of potential land use controls (Section 2.2.4.2), it does not state how and when these measures will be implemented, or how likely they are to succeed. We recognize that FHWA does not have land use authority, and that an effective buffer will require land use decisions by parties other than FHWA. However, the FEIS should state whether relevant parties have agreed to implement measures to prevent development and interchanges on the Parkway, whether the public supports these changes, and whether funding is available to implement them. We recognize that measures could be particularly challenging to implement given the development pressure in southwestern Placer County.

If the buffer were able to prevent additional interchanges on the Parkway, the buffer could have environmental benefits by reducing access to areas with sensitive environmental resources. A 500-1,000 foot buffer could also provide public health benefits by minimizing air toxics impacts to residents and sensitive receptors. We note, however, that a “buffer” along the roadway edge would not be likely to provide habitat benefits, as suggested in the DEIS, since the roadway itself could significantly fragment habitat.

Finally, it appears that the boundaries of the “Central Segment” of the freeway in the DEIS have shifted approximately two miles west, as compared to previously adopted maps.<sup>4</sup> This change would appear to remove approximately two miles of roadway (from the Western Regional Sanitary Landfill Expansion Area to the potential Watt Avenue extension) from the no-development buffer area, providing no constraints on new interchanges in an undeveloped area facing considerable development pressure.

***Recommendations***

Describe and commit to a specific buffer implementation plan that will prevent development near the Parkway and interchanges in the Central Segment. Identify the following:

- specific actions that will be implemented and committed to by FHWA and/or other parties, such as easements and/or deed restrictions

<sup>4</sup> [http://www.pctpa.org/placerparkway/library/5Corridor\\_Align\\_Alts\\_Tier1EIS-EIR\\_09-28-05.pdf](http://www.pctpa.org/placerparkway/library/5Corridor_Align_Alts_Tier1EIS-EIR_09-28-05.pdf)



F-002-011

- responsible parties
- agreed-upon timeframes for completion of specific actions
- specific sources of funding that will be used to prevent near-roadway development and Central Segment interchanges on the Placer Parkway

If such an implementation plan cannot be provided in the Tier 1 FEIS and committed to in the Record of Decision, the Tier 1 FEIS should revise the induced growth analysis to reflect resource impacts that are likely to occur without an assured 500-1,000 foot buffer zone.

Clarify how the boundaries of the freeway segments have changed since EPA's agreement with the range of alternatives for the project (February 16, 2006). Discuss the rationale for expanding the Eastern Segment approximately 2 miles west to the potential Watt Avenue extension. Discuss the potential for additional interchanges in this area, and potential for increased growth-related impacts to environmental resources.

Include quantitative estimates of the indirect impacts, including induced growth impacts, of each alternative in tabular form in Table ES-1 or other summary impact matrix.

F-002-012

iii. Habitat Fragmentation

The DEIS does not adequately address adverse impacts associated with habitat fragmentation from proposed alignments and/or growth adjacent to the Parkway. All proposed Placer Parkway alignments move through a large intact landscape of aquatic and upland habitat. Important natural resources in this landscape include vernal pool grasslands, wetlands, riparian corridors, and stream habitats. These resources provide habitat for federal- and State-listed endangered and threatened species, species of special concern, and other fish and wildlife integral to ecosystem balance and function. Fragmenting these habitats with large urban infrastructure such as a new freeways and/or urban development exposes the remaining resources to myriad adverse impacts associated with isolation in a matrix of urban and suburban developments. At the same time, fragmentation precludes management options that mimic natural disturbance such as burning and grazing needed to maintain health, biodiversity, and productivity of these natural landscapes. Impacts to aquatic resources and endangered species habitat should be estimated for each of the proposed alignments and presented in a summary impact matrix in the FEIS.

**Recommendations**

Include an assessment of potential aquatic and terrestrial habitat fragmentation for each alternative corridor.

Compare the potential impacts of habitat fragmentation by alternative.

F-002-013

iv. Indirect Impacts of Interchanges

EPA is concerned that the DEIS analyzes only the direct footprint of the interchanges but does not include the indirect impacts. In order to determine the corridor(s) most likely to

**F-002-012**

The commenter states that the corridor alignment alternatives are located in a large, intact landscape of aquatic and upland habitats. Recommendations included in this comment are based on the assumption that the affected habitats are intact and not currently fragmented.

The project area and vicinity is not a large, intact landscape of aquatic and upland habitats; however, existing habitats in the project area are fragmented by existing land use practices, including residential development, municipal development, and agricultural practices. Figures 4.14-1, 4.14-2, and 4.14-4 document the fragmented distribution of existing habitats and Figure 3-1 documents the fragmented patterns of existing and proposed land uses in the project area and vicinity. Based on this comment, additional analysis of habitat fragmentation is included in the PRD.

**F-002-013**

The Draft Tier 1 EIS/EIR includes the analysis of all interchanges proposed as part of the project in the environmental analysis. These interchanges are described in Section 2.2.3 of the Draft Tier 1 EIS/EIR. Additional analysis of a potential future interchange with a future extension of Watt Avenue, which is not part of the project, is also provided in Chapter 7 of the Draft Tier 1 EIS/EIR. This analysis was intended to disclose any potential, reasonably foreseeable effects of the Parkway if the Parkway design was modified in the future to include a Watt Avenue interchange as a separate project. Such an interchange would be subject to independent future environmental review and the inclusion of this hypothetical interchange does not predetermine the construction or the alignment of a future Watt Avenue interchange or extension.

With respect to potential growth inducement associated with

F-002-013

contain the LEDPA, the analysis should include both direct and indirect impacts. New interchanges provide access and can facilitate growth, particularly in rural areas that are facing development pressure. The location of interchanges can direct growth to areas that may contain sensitive resources. Given the abundance of aquatic resources, open space, habitat, and farmland, the FEIS should identify not only the direct impacts, but the secondary and indirect impacts, including growth-inducing impacts of the interchanges (including a potential Watt Avenue Interchange).

In addition, the DEIS does not explain why the wetland preserve affected by the Watt Avenue Interchange Option 2 is "outside the scope of this study." If the interchange is part of the proposed project and has direct or indirect impacts on the preserve or other resources of concern, it is within the scope of the project study (40 CFR 1508.8).

**Recommendations**

Analyze both the direct and indirect impacts of project interchanges, including all potential Watt Avenue Interchanges and options.

Include the estimated indirect impacts of interchanges, including habitat fragmentation and growth-inducing impacts, in the analysis of the corridor(s) most likely to contain the LEDPA.

F-002-014

v. Additional Interchanges

The DEIS states that there will be no additional interchanges in the Central Segment. Since a proposed Watt Avenue Interchange is reasonably foreseeable, the FEIS should clearly state that there is likely to be at least one additional interchange – Watt Avenue Interchange – in the Central Segment. Further, given development pressures, other parties may propose to build interchanges in the Central Segment. For example, there could be "enormous pressure on the county to create one or more connections from the parkway to serve the [planned Regional] university."<sup>5</sup> Finally, part of the Central Segment has been reclassified as the Eastern Segment (see **Section II-A-ii** above), which would have no apparent constraints to additional interchanges.

**Recommendation**

Clearly state that there is likely to be at least one additional interchange – Watt Avenue Interchange – in the Central Segment. Given development pressure, especially in the Eastern and Central Segments, discuss the potential that others would seek to build additional interchanges on the Parkway.

F-002-015

**B. Cumulative Impacts Analysis**

The DEIS includes a brief qualitative discussion of cumulative impacts for each resource area. Given the rapid urbanization in the area, we strongly recommend a more comprehensive analysis of cumulative impacts to resources of concern. We recommend using the Caltrans guidance on Cumulative Impact Analysis, co-developed by FHWA and U.S. EPA Region 9, as a framework.

<sup>5</sup> Placer university land gift could net developer hundreds of millions. Sacramento Business Journal, March 2003, by Mike McCarthy.

interchanges, and secondary and indirect impacts that could occur as a result of such growth, including habitat fragmentation, please see Section 6.2, pages 6-16 through 6-24 of the Draft Tier 1 EIS/EIR, which provides the analysis that the commenter suggests is missing. The secondary and indirect impact analysis study area is defined on pages 3-9 and 3-10, and is graphically depicted on Figure 3-1. It includes an expansive study area that extends to the Sacramento and Feather rivers, the City of Lincoln's new city limits and Sphere of Influence area, all of the City of Roseville, and portions of the City of Rocklin and the Town of Loomis. Additionally, each section in Chapter 4 has a specific subsection in the impact analysis devoted to secondary and indirect impacts, all at a Tier 1 level of detail.

In response to this comment, additional analysis was undertaken following publication of the Draft Tier 1 EIS/EIR. This additional analysis, which is presented in the PRD, provides additional analysis of indirect impacts, including habitat fragmentation, of hypothetical additional interchanges as well as full access to the Parkway as if there were no buffer anywhere along its length. This analysis of a hypothetical situation not proposed as part of the project centers on a limited area within one mile of each alternative, to attempt to provide some quantification of the differences among alternatives.

**F-002-014**

The Draft Tier 1 EIS/EIR includes the analysis of all interchanges proposed as part of the project in the environmental analysis. These interchanges are described in Section 2.2.3 of the Draft Tier 1 EIS/EIR. Additional analysis of a potential future interchange with a future extension of Watt Avenue, which is not part of the project, is also provided in Chapter 7 of the Draft Tier 1 EIS/EIR. This analysis was intended to disclose any potential, reasonably foreseeable effects of the Parkway if the Parkway design was modified in the future by others to include a Watt Avenue interchange. This and any other future

F-002-015

The Council on Environmental Quality's regulations implementing NEPA define cumulative impact as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (40 CFR 1508.7)

For example, aquatic resources in western Placer County have been cumulatively affected by past actions and are likely to be adversely impacted by future development, including the proposed parkway. Historical impacts on aquatic ecosystems include California's rapid population growth and resulting losses of approximately 95% of the State's wetlands (Dahl, T.E., 1990) and up to 85% (Holland, Robert, 1978) of the vernal pools. According to estimates provided by the Placer County Planning Department, there are approximately 20,000 acres of vernal pool grassland habitat remaining in the western part of Placer County, a small fraction of historical distribution. The majority of this vernal pool habitat is located on private lands and vulnerable to permanent removal. Proposed development projects in western Placer County threaten at least half of these unprotected vernal pool grassland habitat areas. These projects include, but are not limited to the following: Placer Vineyards, Creekview, Sierra Vista, Placer Ranch, Riolo Vineyards, Regional University, Brookfield, Curry Creek, expansion of the western regional landfill, and portions of the City of Roseville's Retention Basin property.

We also recommend a robust cumulative analysis at Tier 1 because it allows FHWA and other stakeholders to identify early opportunities to avoid and minimize cumulative impacts to resources, and to identify landscape-level opportunities able to protect or restore environmental resources that may be cumulatively at risk.

**Recommendations**

Include a more robust cumulative impact analysis in the FEIS. The Caltrans Cumulative Impact Guidance is a useful reference and is available at the following site: [http://www.dot.ca.gov/ser/cumulative\\_guidance/approach.htm](http://www.dot.ca.gov/ser/cumulative_guidance/approach.htm)

Identify potential landscape-level opportunities to avoid, minimize, and mitigate cumulative impacts to resources of concern, including those that are outside of FHWA's authority. Specifically, in the FEIS, provide resource avoidance guidance for the preparation of the Tier 2 environmental documentation and identify measures that can be accomplished early, before the Tier 2 environmental review process is required.

**Section III: Resource-Specific Comments**

In addition to the major concerns listed above, we have resource-specific concerns regarding: A) hydrology, floodplains, and water quality, and B) air quality.

hypothetical interchanges would be subject to independent future environmental review.

In response to this and other comments provided by the commenter, analysis of hypothetical additional interchanges not proposed as part of the Placer Parkway project was conducted following publication of the Draft Tier 1 EIS/EIR. This analysis is presented in the PRD. Please also see response to Comment F-002-013.

**F-002-015**

Please see response to Comment F-002-008.

**A. Hydrology and Floodplains, and Water Quality**

EPA supports project elements, such as bridges and spans that would avoid environmental impacts. The DEIS states that, "As necessary, bridges would be used to span certain features and improvements such as... floodplains." (2.2.2) and that "[w]here creek crossings coincide with floodplain crossings, the road would be elevated on a bridge." The DEIS also states that "Culverts would be used at smaller creek crossings as appropriate depending on local conditions and permit requirements." We recommend that the Tier 1 FEIS include commitments to use avoidance features such as bridges, spans, and arched or bottomless culverts.

The description of the realignment of Steelhead Creek is unclear. For example, Corridor 1 is stated to cross 7,000 feet of Steelhead Creek longitudinally (page 4.11-15) potentially requiring realignment of Steelhead Creek that could cause substantial adverse impact to the resource. It is unclear from the DEIS whether all roadway alignments in the corridor would require 7,000 feet of creek realignment, or whether there would be opportunities to reduce the amount of creek realignment through the location of roadway alignments and/or additional avoidance measures.

A commitment to avoid impacts associated stream crossings using design options such as elevated structures and bottomless culverts are important aspects of identifying the alternative corridor(s) most likely to contain the LEDPA.

***Recommendations***

Include in the FEIS a description of which floodplain areas would likely be spanned as part of the Placer Parkway project, including a map of the elevated structures over the floodplain and an estimate of elevated road distances.

Provide information on how the creek realignment in Corridor 1 could be avoided or minimized.

Include in the FEIS a commitment to use measures to avoid resource impacts. In particular, commit to the following:

- Use newer technology culverts and less damaging culverts such as large bottomless or arched culverts.
- Span floodplains and major creek crossings to avoid impacts to aquatic resources.

The DEIS states that there are no streams within the Natomas Basin. We recognize that many natural streams in the Basin have been straightened and channelized in portions, but not for their entire courses. In Figure 2-2 the outside slope from roadway corridor to roadway buffer is shown as being a ratio of 4:1. The DEIS does not include a discussion of how the slope will be stabilized or maintained (e.g., vegetation or rock slope protection). Stabilizing slopes with native vegetation is recommended especially if this part of the roadway is built in waters of the U.S. Less steep slopes are preferred for long-term maintenance and reduction of potential future impacts to waters of the U.S. that could occur from steep slopes slumping into waterways.

**F-002-016**

Section 4.11 of the Draft Tier 1 EIS/EIR provides a discussion of hydrology and floodplains appropriate for a Tier 1 level analysis. At the Tier 2 stage, as described in Section 4.11.5, additional analysis will be undertaken to evaluate potential impacts on hydrology and floodplains. This would include additional evaluation of streams and other water features in the Natomas Basin, identification of potential impacts on specific floodplains and more detailed assessment of potential impacts on streams and canals throughout the study area. As described in Section 4.11.4, at the Tier 2 stage, design will include a range of strategies to reduce floodplain and hydrological impacts. These would include avoidance and minimization measures, such as the use of bridges to span floodplains. Additional measures such as those suggested by the commenter (e.g., slope stabilization techniques, newer technology culverts and bottomless or arched culverts) will be evaluated further during Tier 2.

The commenter asks for information on how the realignment of Steelhead Creek, identified as an impact under Alternative 1, could be avoided. Alternative 1 would have additional habitat fragmentation impacts along this tributary of the Natomas East Main Drainage Canal. As proposed, Alternative 1 would require a longitudinal crossing (as opposed to a shorter perpendicular crossing) that would affect approximately 7,000 linear feet of Steelhead Creek. Adjustments in this alignment to eliminate or reduce this impact were explored. Since the creek lies both along the top and the bottom of the corridor alignment, it would be difficult for minor realignments to eliminate this impact entirely without substantive relocation. Realignment of this alternative to the north would not substantively reduce the length of longitudinal crossing (it would pick up an additional length of stream to replace the length avoided, unless it were to lie immediately adjacent to Alternative 2). Reduction in the length of longitudinal crossing could occur if the roadway were realigned to the south. This would involve bisecting the

F-002-016

**Recommendations**

Clarify the extent of streams and canals in the Natomas Basin.

Include a discussion of how the 4:1 slope from the roadway corridor to roadway buffer will be stabilized; and the feasibility of less steep slopes.

Ensure consistency with the Executive Order 13112 on Invasive Species. Include a commitment to use native vegetation and to reuse native soils in re-vegetation.

Add CWA Section 404 to the bulleted list of federal regulations applicable to hydrology and floodplains. (4.11.1.1)

F-002-017

**B. Air Quality**

**i. Mobile Source Air Toxics**

EPA commends FHWA for including a discussion of Mobile Source Air Toxics (MSAT) in the Tier 1 document. While this project is being constructed in a rural area, a large number of residential developments are planned in proximity of the Parkway. Many recent studies have examined the association between living near major roads and different adverse health endpoints. Several well-conducted epidemiologic studies have shown associations with cardiovascular effects, premature adult mortality, adverse birth outcomes, including low birth weight and size, and asthma-related respiratory symptoms in children. Several MSATs are classified as known and likely human carcinogens. Many studies have measured elevated concentrations of pollutants emitted directly by motor vehicles near large roadways. These elevated concentrations generally occur within approximately 200 meters of the road, although the distance may vary depending on traffic and environmental conditions. (See [www.epa.gov/otaq/toxics.htm](http://www.epa.gov/otaq/toxics.htm).)

Interim guidance on MSAT analysis for transportation is available from FHWA (February 2006). However, EPA disagrees with aspects of the guidance, including the use of a 150,000 annual average daily traffic (AADT) threshold for MSAT impacts. Traffic levels well below that threshold can result in public health impacts (Cal-EPA/CARB 2005) depending on proximity to the roadway.

We support the DEIS's use of the *Air Quality and Land Use Handbook: A Community Health Perspective, April 2005* (Cal-EPA/CARB, 2005) as a resource for assessing the potential MSAT impacts. The Handbook reflects recent science on near-roadway air impacts. The project's proposed 500-1,000 foot buffer, if achievable, would be consistent with the California Air Resources Board (CARB) recommendations for minimizing MSAT impacts of a highway with projected volumes of the Placer Parkway. The March 2007 report entitled "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process" conducted for the American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment and funded by the Transportation Research Board ([http://www.trb.org/NotesDocs/25-25\(18\)\\_FR.pdf](http://www.trb.org/NotesDocs/25-25(18)_FR.pdf)) contains additional guidance on assessing MSAT emissions. In addition, procedures for toxicity-weighting, which EPA has found to be especially useful for the targeting of mitigation, are described in EPA's

Country Acres community to the south and impacting Curry Creek at its widest point as the road curves north, or providing unacceptable roadway curvature. In addition, direction from the project's Advisory Committees was to locate this alternative approximately one mile north of Baseline Road, to allow for potential development between Placer Parkway and Baseline Road. For these reasons, realignment is not proposed.

The bulleted list of regulations in Section 4.11.1.1 comprises regulations that apply to transportation projects with respect to hydrology and floodplains. Section 404 permits are only relevant to transportation projects where impacts on waters of the United States are anticipated. The Tier 1 project does not include any construction, and therefore does not require a Section 404 permit, and so this permit is not relevant at this stage of the project. However, the Section 404 process is discussed in general terms in Section 4.11.1.1 of the Draft Tier 1 EIS/EIR. No additional revision of the Draft Tier 1 EIS/EIR is required.

**F-002-017**

A preliminary evaluation of Mobile Source Air Toxics is provided in Section 4.9.3.4 of the Draft Tier 1 EIS/EIR. As described in this section, and in Section 4.9.5, a detailed evaluation of air toxics will be undertaken at the Tier 2 stage. The extent of the analyses will reflect the category the Parkway falls under (as determined by FHWA guidance on air toxics analysis in effect at that time) and will also consider recommendations made by the commenter with respect to the assessment of potential effect on sensitive receptors, the severity of existing conditions, public air toxic concerns, etc. The transportation agencies acknowledge U.S. EPA's disagreement with some aspects of the FHWA guidance; since a detailed evaluation will be conducted in the Tier 2 stage, there is no need to address that disagreement in this Tier 1 document.

F-002-017

Air Toxics Risk Assessment Reference Library. EPA is available to work with FHWA to evaluate the appropriate level of MSAT analysis for this project in Tier 2.

**Recommendations**

EPA recommends performing an analysis of potential MSAT impacts in Tier 2 to inform decision-making and avoidance, minimization, and mitigation options. When considering appropriate and useful levels of analysis, EPA recommends that the lead agency consider the following:

- The likelihood of and potential magnitude of the effect, including both the magnitude of emissions and their proximity to potential residential and sensitive receptors (e.g., schools, hospitals, day care facilities, and nursing homes;
- The severity of existing conditions;
- Whether the project is controversial and whether air toxics concerns have been raised by the public for this project or for other projects in the area in the past;
- Whether there is a precedent for analysis for projects of this type; and
- Whether the analysis could be useful for distinguishing between alternatives, informing design changes, and targeting mitigation.

F-002-018

ii. New 24-hour federal standard for PM<sub>2.5</sub>

Tables 4.9-1 incorrectly states the federal 24-hour National Ambient Air Quality Standard (NAAQS) for fine particulate matter with a diameter of 2.5 microns or less (PM<sub>2.5</sub>) as 65 micrograms per cubic meter (ug/m<sup>3</sup>). In December 2006, the revised 24-hour standard of 35 ug/m<sup>3</sup> for PM<sub>2.5</sub> became effective. While EPA has not yet designated areas as non-attainment for the new 24-hour standard for PM<sub>2.5</sub>, the FEIS should include the most recent monitoring data and assessment of potential PM<sub>2.5</sub> impacts.

**Recommendation**

Correct the federal standard for 24-hour PM<sub>2.5</sub> and include the most recent monitoring data and assessment of potential PM 2.5 impacts in the Final EIS.

**SECTION IV: OTHER COMMENTS**

F-002-019

**A. Hypothetical Smart Growth Scenario**

As part of the Tier 1 modified NEPA/404 MOU process, FHWA agreed to prepare a hypothetical Land Use and Policy – smart growth – scenario that would meet traffic demand without building a Parkway (FHWA letter to EPA, January 18, 2006). The analysis would incorporate tools to meet anticipated demand without a new freeway, even those that are outside the authority of the project sponsors or would require actions by municipalities or decision makers outside the Placer Parkway study area.

The NEPA/404 MOU partners agreed that this hypothetical scenario would not be a reasonable alternative for purposes of NEPA analysis. However, the scenario would illustrate to the public and decision makers the type and combination of activities that a

**F-002-018**

The federal 24-hour PM<sub>2.5</sub> standard has been updated in Table 4.9-1 to reflect the most recent standard of 35 µg/m<sup>3</sup>. In addition, the tables of ambient data and emissions inventories have been updated to summarize the most recent data (2008) available from the California Air Resources Board. This information is included in Chapter 4 of this Final Tier 1 EIS/EIR.

An additional PM<sub>2.5</sub> analysis has not been performed. The existing PM<sub>10</sub> analysis will serve as a surrogate of PM<sub>2.5</sub> emissions. At the time the analysis was performed, PM<sub>2.5</sub> factors were not available within the models used to perform the calculations. Although these models have been updated since the analysis was done to include PM<sub>2.5</sub>, neither the Placer County Air Pollution Control District nor the Feather River Air Quality Management District has PM<sub>2.5</sub> emissions thresholds for purposes of determining significance of impacts. In addition, dispersion modeling was not performed for this Tier 1 analysis; predicted ground-level concentrations are not available to compare to the PM<sub>2.5</sub> ambient air quality standard. As such, the PM<sub>10</sub> emissions will be conservatively assumed to represent PM<sub>2.5</sub> as well.

**F-002-019**

Section 2.6 (pages 2-36 through 2-41) of the Draft Tier 1 EIS/EIR outlines the Land Use and Policy Scenario. This theoretical scenario would reduce travel demand through an enhanced Smart Growth program using improved land use and transportation principles. The discussion of the Land Use and Policy Scenario in the Draft Tier 1 EIS/EIR included a number of components beyond the SACOG Blueprint. These included a visionary approach for transit (not just current plans) and SACOG Blueprint Smart Growth tools for greenfield, infill, and redevelopment areas. The scenario assumed a very robust transit system and a high level of walk/bike trips. The findings showed that the approach would help short trips on local roads but would not

F-002-019

region might adopt to meet transportation demand in a rapidly growing area without building new freeways.

In the Mineta Transportation Institute Report 04-02<sup>6</sup>, authors Johnston, Gao, and Clay demonstrate that a set of policy and land-use changes could be implemented within the SACOG region that would reduce vehicle miles traveled without building new freeways. This study includes policies such as fixed urban growth boundaries, increased transit, and pricing tools, such as gasoline taxes and parking fees. The scenarios in the study went beyond the assumptions made in current plans and the SACOG Blueprint Preferred Scenario.

The Land Use and Policy Scenario in the DEIS limits analysis to assumptions in current transit plans and the SACOG Blueprint, which includes two new freeways. In order to accomplish the goal of the Land Use and Policy Scenario (Section 2.6), FHWA would need to include transit, pricing, and smart growth tools that go beyond the assumptions made in current plans and the SACOG Blueprint, even if their implementation is speculative or funding is not available.

**Recommendation**

Revise the assumptions in the analysis as needed (e.g. urban growth boundaries, increased densities, congestion pricing, additional transit, etc.) to accomplish the goal of the hypothetical Land Use and Policy Scenario.

F-002-020

**B. State Route 65 Auxiliary Lanes**

Section 2.2.3.3 describes the ultimate configuration of the Placer Parkway/State Route (SR) 65 connection. It appears that the auxiliary lanes at State Route 65 are necessary for the full operation of the Placer Parkway, but they are not clearly identified in the DEIS as either part of the project or a connected action (40 CFR 1508.25(a)). It is unclear whether the environmental impacts of the auxiliary lanes on State Route 65 are included in the impact assessment for the Placer Parkway.

**Recommendation**

Include the direct and indirect impacts of all components of the project and connected actions, including the auxiliary lanes on SR 65, in the FEIS. Revise estimates of impacts to resources, as appropriate, and provide additional mitigation opportunities.

<sup>6</sup> Johnston, Gao, Clay (2005). Modeling Long-Range Transportation and Land Use Scenarios for the Sacramento Region, Using Citizen-Generated Policies. Mineta Transportation Institute Report 04-02. <http://transweb.sjsu.edu/mtportal/research/publications/summary/0402.html>

have any major benefits on the regional roadway system. The scenario reflected the intent of going beyond the Blueprint. The analysis in the EIS/EIR is based on the implementation of a wide range of measures to see how far travel demand could be reduced, and found that assuming aggressive reductions in travel demand would not eliminate the need for the Parkway, as the project is needed to serve future growth.

This issue was discussed at length at a Placer Parkway Modified NEPA/404 Process interagency meeting held on November 7, 2007. As a result of discussions at this meetings, agencies agreed that no further analysis would be required.

The Land Use and Policy Scenario was hypothetical and did assume (1) a transit system that clearly goes beyond current plans and (2) very aggressive Smart Growth practices. Both of these are speculative and go beyond the authority of the project sponsors.

The Draft Tier 1 EIS/EIR acknowledges that some "limits" were placed on the assumptions used for the Land Use and Policy Scenario including:

- While no urban development was assumed outside of the areas allowed under the SACOG Blueprint, this scenario did not assume a stronger urban growth boundary than the one implied by the Blueprint because the Blueprint itself assumes limits on urban growth, not just in Placer and Sutter counties but regionwide.
- This scenario does not include pricing mechanisms beyond those assumed by SACOG under the Blueprint. Parking charges would not be technically feasible to implement widespread congestion pricing in a suburban setting because most lots are small and many parkers would find alternative places to park that cannot be controlled. Congestion pricing could not be implemented on arterial roadways, and its implementation on freeways would not provide

## SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### ADEQUACY OF THE IMPACT STATEMENT

#### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

significant traffic relief on the local roadway system; thus, it would not meet the project's Purpose and Need.

The Land Use and Policy Scenario demonstrates that the projected level of new development by 2040 in southwest Placer County and South Sutter County is expected to be substantial with or without Placer Parkway. While Smart Growth, transit and pricing mechanisms aimed at reducing traffic growth on local roadways and vehicle miles of travel should be aggressively pursued, these measures alone would not reduce traffic volumes enough to meet the Purpose and Need for the project.

The only measure that could meet the Purpose and Need for the project without building the proposed Placer Parkway (or building a comparable regional roadway) would involve substantially limiting growth in southwest Placer County and South Sutter County. The amount of reduction that would meet the Purpose and Need is subjective. The 2020 analysis, which limited growth to areas already approved for development, includes over 60,000 new residential units in southwest Placer County. This scenario demonstrates the need for Placer Parkway.

Please see Master Response 2, which provides information regarding Placer County Transportation Planning Agency transit planning activities.

#### **F-002-020**

Auxiliary lanes on State Route 65 are described in Section 2.2.3.3. This section is part of the description of common design features of the Parkway build alternatives. Auxiliary lanes on State Route 65 are part of the project and have been analyzed as such for both direct and indirect impacts, including potential impacts on the transportation network as well as for all other potentially affected environmental resources.



Modification of the "National Environmental Policy Act/Clean Water Act  
Section 404 Integration Process for Surface Transportation Projects  
Memorandum of Understanding (NEPA/404 MOU)"<sup>1</sup>  
for application to  
the Placer Parkway Corridor Preservation Project  
April 12, 2004

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The NEPA/404 MOU integrates requirements of the Clean Water Act Section 404 permit process into the NEPA environmental review. This integration facilitates the preparation of the Section 404 permit application at the end of the NEPA process. While a Tier 1 evaluation will not result in a Section 404 permit application, the associated Tier 2 project will require a permit. Therefore, the NEPA/404 process is modified for Tier 1 to reflect decisions made at Tier 1, and to anticipate the permit application requirements at Tier 2. The NEPA/404 process for Tier 2 will follow the standard procedure outlined in Appendix A of the NEPA/404 MOU.

The goal of the modified NEPA/404 process for Tier 1 is to ensure that Tier 1 decisions reflect careful consideration of the 404(b)(1) Guidelines (40 CFR 230), which are binding, substantive regulations implementing the Clean Water Act. The Guidelines should be addressed as early as possible in the Tier 1 NEPA evaluation to eliminate the need to revisit decisions in Tier 2 that might otherwise conflict with 404 permit requirements.

The Tier 1 (modified) and Tier 2 (standard) NEPA/404 processes are similar in many respects. Both Tier 1 and Tier 2 NEPA/404 include five concurrence points<sup>2</sup>. The main difference between Tier 1 and Tier 2 NEPA/404 processes are the last two concurrence points. In Tier 2, the project proponent seeks agency concurrence on the "least environmentally damaging practicable alternative" (LEDPA) and the conceptual mitigation plan for the LEDPA. In Tier 1, however, the project proponent seeks agency concurrence on the alternative (corridor) *most likely to contain the LEDPA*, and on the *general framework* for mitigation. All other elements of the standard NEPA/404 process apply, unless otherwise indicated.

The Tier 1 modified NEPA/404 process includes five concurrence points:

1. Purpose and Need
2. Criteria for Selecting the Range of Alternatives
3. Range of Alternatives
4. Alternative(s) most likely to contain the LEDPA
5. Mitigation Framework

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<sup>1</sup>Signed by Federal Highway Administration, Federal Transit Administration, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Transportation, Arizona Department of Transportation, Nevada Department of Transportation (1993).

<sup>2</sup>Concurrence/Non-Concurrence is described in Section VI of the NEPA/404 MOU.

These concurrence points are sequential, each one building upon and consistent with previous concurrences. Concurrence points #1 to #3 occur prior to completion of the Tier 1 Draft EIS. Concurrence points #4 and #5 occur prior to completion of the Tier 1 Final EIS. The NEPA/404 signatory agencies may agree to bundle concurrence points for purposes of review.

#### Concurrence Point #1: Purpose and Need

The Council on Environmental Quality regulations implementing NEPA call for a statement of purpose and need (40 CFR 1502.13). The Section 404(b)(1) Guidelines include a basic purpose (40 CFR 230.10(a)(3)) and an overall project purpose (40 CFR 230.10(a)(2)). For NEPA/404 integration, one statement of purpose and need should be developed to meet all requirements.

The NEPA purpose and need statement briefly specifies the underlying purpose and need of the proposed project. The NEPA document should explain the project need, and demonstrate the project's logical termini and independent utility.

The Section 404(b)(1) Guidelines basic purpose is a brief statement that assists regulators in determining whether a project is water-dependent. The overall project purpose is an elaboration of the basic purpose, and provides a more specific description of the purpose and need for the project.<sup>3</sup> The overall project purpose should be broad enough to allow for an appropriate range of alternatives that avoid special aquatic sites, as defined in the Section 404 (b)(1) Guidelines (40 CFR 230 Subpart E). "Avoidance alternatives" could include alternatives that do not require securing a new right-of-way, maximize use of existing infrastructure, implement congestion pricing, or adjust the project study area to include alignments that impact fewer aquatic resources.

#### Concurrence Point #2: Criteria for Selecting the Range of Alternatives

The project sponsor develops criteria for selecting a reasonable range of alternatives. If the number of potential alternatives generated is very large, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS.<sup>4</sup> The criteria can be used to screen out or narrow the range of alternatives that will be carried forward for analysis in the Draft EIS. For NEPA/404 MOU projects, environmental criteria should be applied so that each alternative can be ranked based on its impact to the aquatic ecosystem.

Two types of screening criteria that can be effective for Tier 1 decision making are "project purpose" and "fatal flaw" analyses. Under the Clean Water Act Section 404 (b)(1) Guidelines, an alternative may be eliminated from consideration in the Draft EIS if it does not meet the project purpose. Fatal flaws are unavoidable or unmitigatable impacts associated with an alternative that are so great that the project could never go forward.

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<sup>3</sup>For a discussion of basic purpose and overall project purpose, see Yocom, T.G., R.A. Leidy, and C.A. Morris. 1989. "Wetlands Protection Through Impact Avoidance: A Discussion of the 404(b)(1) Alternatives Analysis." Wetlands. Vol 9, No. 2, pages 283-297.

<sup>4</sup>Council on Environmental Quality's Questions and Answers about the NEPA Regulations, Question 1.b. (1981)

Concurrence Point #3: Range of Alternatives

The Range of Alternatives includes those alternatives that will be evaluated in the Draft EIS. For NEPA/404 projects, the range should include alternatives that avoid and minimize impacts to waters of the U.S. to the greatest extent possible. The range can include reasonable alternatives not within the jurisdiction of the lead agency, and a no-action alternative (40 CFR 1502.14 (c) and (d)).

— Tier 1 DEIS Circulation and Public Comment Period —

Concurrence Point #4: Alternative(s) most likely to contain the LEDPA

The U.S. Army Corps of Engineers cannot grant a CWA Section 404 permit to a Tier 2 preferred alternative that is not the LEDPA. Therefore, it is critical that any alternative likely to contain the LEDPA is not prematurely eliminated during the Tier 1 NEPA review. Although a Tier 1 landscape-level analysis may provide enough information to eliminate alternatives that would clearly have the *greatest* environmental impacts, the analysis may not be detailed enough to identify with certainty a *single* alternative that is likely to contain the LEDPA. If the Tier 1 analysis indicates that there are several alternatives likely to contain the LEDPA, and the lead agency does not want to prematurely eliminate any alternative likely to contain the LEDPA, then all of the alternatives likely to contain the LEDPA should be carried forward to Tier 2.

However, the lead agency can attempt to further narrow the range of alternatives likely to contain the LEDPA by performing additional analysis in Tier 1. Analytical tools could include:

- functional assessment of aquatic resources,
- photo-interpretation of aerial photos,
- spot surveys,
- delineations in selected areas of special significance,
- full delineation of waters of the U.S., or
- geo-referenced data points from delineations done for this or other projects.

If the lead agency chooses to eliminate in Tier 1 any alternative(s) likely to contain the LEDPA, there is a risk that the eliminated alternative(s) may need to be revisited in Tier 2.

Concurrence Point #5 – Mitigation Framework

The Tier 1 mitigation framework will describe in general terms the processes that the project sponsor will use to maximize opportunities for successful mitigation, including long-term mitigation and management of resources. The framework should identify:

1. Mitigation options available for creation, restoration, enhancement and preservation of aquatic resources (e.g., land dedication, acquisition of conservation easements, in lieu fees for acquisition, mitigation banks), and potential mitigation sites.

2. Opportunities to build upon existing or planned conservation efforts of other agencies and non-governmental organizations for the purposes of protecting and restoring large, intact landscapes.
3. Institutions and instruments for long-term management of mitigation sites.

— Tier 1 FEIS Circulation. Agency Comment Period. Tier 1 Record of Decision. —

Note: It is presumed that the Tier 2 project will follow the standard NEPA/404 MOU process.



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U.S. Fish and Wildlife Service File # 1-1-07-TA-1484

Celia McAdam, Executive Director  
 Placer County Transportation Planning Agency  
 299 Nevada Street  
 Auburn, CA 95603

Subject: Comments on the Draft Tier 1 Environmental Impact  
 Statement/Environmental Impact Report for the Proposed Placer Parkway Project  
 in Sutter and Placer Counties, California

Dear Ms. McAdam:

The California Department of Fish and Game (DFG) and the U.S. Fish and Wildlife Service (Service) have reviewed the Draft Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/Program Environmental Impact Report (EIS/EIR) (Report # FHWA-CA-DEIS 2007-46, SCH# 2003092069) (proposed project). This Tier 1 EIS/EIR analyzes the environmental impacts associated with the selection of a corridor from five alternative alignments for Placer Parkway. The proposed project is designed to connect State Route (SR) 65 in Placer County with SR 70/99 in Sutter County. Subsequent Tier 2 documents would provide specific onsite analysis of the selected alternative, ultimately resulting in construction of a 6-lane highway project ranging in length, depending on alternative selected, from about 14.2 to 16.2 miles and directly impacting (impervious surfaces) from 622 to 745 acres.

Significant natural resources of the plan area include stream and riparian habitats, wetlands including vernal pools and upland grasslands and associated federally-listed invertebrates, and both nesting and foraging habitat (grasslands) for the state listed threatened Swainson's hawk (*Buteo swainsonii*). The federally-listed invertebrates of concern include the endangered Conservancy fairy shrimp (*Branchinecta conservatio*), the endangered vernal pool tadpole shrimp (*Lepidurus packardii*), and the threatened vernal pool fairy shrimp (*Branchinecta lynchi*). The area in and around the site of the proposed project also provides important resting and foraging habitat for winter migrant bird species including waterfowl of the Pacific Flyway. The majority of the proposed alternative lands are undeveloped, although several large urban development projects are being proposed or considered within the area.

F-003-001

Currently, all alternatives occur within a large block of nonfragmented vernal pool and grassland habitat. Based on work completed and provided by Placer County, western Placer

**F-003-001**

The assertion in the comment that the proposed project poses a significant risk to the remaining 15,000 acres of unprotected vernal pool habitat in Placer County is not supported by the analysis in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, or by the analysis in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD), which was circulated for public comment on January 30, 2009. None of the proposed project alternatives would affect more than 127.6 acres of vernal pool complex (including wetlands and associated uplands). This acreage is less than 1 percent of the 15,000 acres of such habitat remaining in western Placer County.

As documented in the PRD, the area of western Placer County referred to by the commenter is already subject to extensive planned and proposed future residential, commercial, and municipal development. The contribution of the project to the cumulative effects of this development on vernal pool habitat is described in Appendix G of the PRD. This finding of the cumulative impact analysis presented in this document supports the findings presented in the Draft Tier 1 EIS/EIR; namely that the cumulative impacts of the Parkway and other past, present and reasonably foreseeable future projects would be substantial, and would be considered a "cumulatively significant impact" under CEQA. Although Placer Parkway's contribution to cumulative habitat loss is less than 0.17 percent of the historic acres of vernal pools in the study area (please see Table G-12 in Appendix G of the PRD), and approximately 0.72 percent of future losses (please see Table G-14 in Appendix G of the PRD), this contribution is acknowledged to be substantial ("significant" under CEQA) in the context of past, present, and future losses.

F-003-001

County supports only about 20,000 acres of vernal pool grassland habitat. This acreage of remaining vernal pool grassland habitat is only a small percent of historical levels of this habitat type in the County; about 5,000 acres of this total habitat acreage in Placer County is within existing preserves and, subsequently, about 15,000 acres of this habitat remain vulnerable to urban impact. The proposed project, along with other reasonably foreseeable proposed or considered development in western Placer County, pose significant risk to the persistence of at least 50 percent, or more, of these 15,000 acres as habitat.

The DFG is providing comments in response to the Draft EIS/EIR as trustee for the State's fish and wildlife resources, and which has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of such species. In that capacity, the DFG administers the California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and other provisions of the California Fish and Game Code that affords protection to the State's fish and wildlife trust resources. The DFG also considers issues as related to the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703-712). The Service is providing comments in accordance with the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (ESA), and the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703-712

The DFG and the Service have the following comments:

Existing Conditions/Affected Environment

F-003-002

Section 2.6.2, Sacramento Area Council of Governments's (SACOG) Blueprint, page 2-38 and 2-39: The land use and policy scenario used in this document "assumes an "aggressive" implementation of the Blueprints Smart Growth land use/design principles on a regional basis". We believe that the approval of the Placer Vineyards development by the Placer County Board of Supervisors in a manner inconsistent with SACOG's Blueprint is a fundamental flaw for the basis of any conclusions in this document regarding future land use. Failure by the Board to pursue an increased density project allowing for 21,000 units, as suggested by SACOG, and approving instead a 14,000 unit project will result in additional loss of land to accommodate the additional needed units.

Potential Project Impacts

Direct and Indirect Impacts

F-003-003

Vernal pool species are threatened primarily by loss and fragmentation of existing habitat. Vernal pool complexes, which are mosaics of wetted pools which are hydrologically connected and include the associated upland habitat and local watersheds essential for the function of the pools, must be preserved on a landscape level to ensure the persistence of the species that inhabit them. Although dispersal of vernal pool crustaceans between complexes is and probably always has been relatively low, fragmentation of existing intact complexes could contribute to the loss of genetic diversity of vernal pool species, and reduce the likelihood of

**F-003-002**

This comment is noted. Whether or not the County approved the Blueprint Alternative for the Placer Vineyards Specific Plan, such approvals should not be extrapolated to all development proposals in Placer County, or in jurisdictions within Placer County. For example, the City of Roseville has adopted Implementation Strategies to Achieve Blueprint Objectives (May 2005) (City of Roseville, 2005), and a blanket statement that the Sacramento Area Council of Government's (SACOG) Blueprint cannot be relied on in any way in connection with the Draft Tier 1 EIS/EIR is incorrect.

**F-003-003**

The commenter correctly points to the discussion in the second paragraph on page 4.14-31, which identifies indirect impacts to vernal pools. Although the California Environmental Quality Act (CEQA) Evaluation in Chapter 5 does identify "significant and unavoidable impacts" to vernal pool and wetland species, the section entitled Vernal Pool and Wetland Species on page 5-18 is clarified by adding the following sentence after the second sentence:

In addition, vernal pool wetland features adjacent to the project corridor could be indirectly impacted as described in Section 4.14.3.4.

F-003-003

recolonization from other populations. Fragmentation by conversion or degradation of habitat may essentially serve as a barrier to dispersal. It is essential that large, contiguous areas of uninterrupted vernal pool habitat, including both wetted and upland components, be preserved across the range of each of the listed species to "buffer" against unforeseen stochastic events.

The document in discussing Evaluation Criteria states, in part, on page 4.14-11, second bullet, "Substantial interference with the movement....". We have concluded, using this criteria and an abundance of scientific literature concerning habitat fragmentation, that conclusions reached on page 4.14-31, second paragraph, concerning the degree to which each alternative would impact hydrology and habitat loss and fragmentation must be followed by conclusions in this document that indirect impacts as a result of this project will be significant.

Cumulative Impacts

F-003-004

Executive Summary, page ES-5 under Opening Year – 2020: The Service and the DFG, along with other regulatory agencies, have been meeting regularly with the City of Roseville and proponents for the Creekview and Sierra Vista Specific Plan projects. Both projects are being considered for annexation into Roseville, and are being actively planned and analyzed. Given the current high demand for residential housing in western Placer County, we believe that it reasonable to assume that the proposed projects listed under the second bullet may be built or at the least underway as of the year 2020, and should be considered as cumulative effects.

F-003-005

Page 4.14-32, Paragraph 3, first sentence: We concur that the proposed project is located primarily "within areas already proposed for future urban uses". We believe that to conclude, as this document asserts, that the proposed project will not significantly increase cumulative impacts resulting in habitat fragmentation is unfounded and speculative. First, most all of the land within the central portion of the proposed project in Placer County is currently designated in the Placer County General Plan and zoned for agricultural uses. This does not prevent or preclude any landowner from proposing any project. To thus conclude that a proposal equates to a completed project is inaccurate. Second, the proposed project, even with some element of future growth within the project area, will directly impact animal movement and result in habitat fragmentation and population isolation. The degree to which the proposed project will contribute to this future cumulative impact scenario is unknown because the level of future urban growth is not known, however to conclude other than a significant level of impact is not supported. We conclude that analysis for all of the alternatives has failed to adequately analyze or consider the contribution that the proposed project will have to either the additional increment of urban development or the specific location of that development. We believe that each alternative will impact both levels of growth and the ultimate location of that growth.

Proposed Mitigation and Compensation

F-003-006

Section 4.14.4.3, Tier 2 Mitigation Commitments: The document considers and evaluates habitat fragmentation and concludes these issues to be substantial, however the document fails (basis for need to provide mitigation and compensation is provided in discussion on Indirect

**F-003-004**

Development time frames can vary widely over the 40-year horizon for the Placer Parkway project, as acknowledged in the Draft Tier 1 EIS/EIR and as explicitly discussed in Section 3.6.1. This is one of the reasons that the 2020 and 2040 horizon years were developed for analysis. These years were intended to "bracket" regional development levels from a low (2020) to high (2040) level, as described in response to Comment B-002-008. This is entirely appropriate for a Tier 1 level of analysis, and accurately captures both the lowest probable level of development and the highest probable level of development. The cumulative impact scenario (2040) assumes buildout of the Creekview and Sierra Vista Specific Plans.

**F-003-005**

The commenter states that that it is unfounded and speculative to assert that the proposed project will not significantly increase cumulative impacts resulting in habitat fragmentation. The Draft Tier 1 EIS/EIR does identify that cumulative impacts to habitat would occur (please see pages 5-28 and 5-29), and agrees with the commenter's view that a substantial amount of development is likely to occur in the study area. This discussion points out that the Parkway's contribution to this impact would be limited to those few areas where development would not be likely to occur except for the Parkway (page 5-29). Nevertheless, the Draft Tier 1 EIS/EIR in its CEQA evaluation does state that, "the Parkway's contribution to cumulative impacts associated with habitat loss and habitat fragmentation would be a significant impact of the project" (page 5-29).

As discussed in Section 3.6.1 of the Draft Tier 1 EIS/EIR, the Parkway is being studied in the context of a rapidly urbanizing region. The planning effort considered several sets of development assumptions to address the existing, currently planned, and proposed or possible levels of development. It is, therefore, not accurate to suggest that the Draft Tier

**F-003-006** Impacts above) to identify any measures designed to compensate and mitigate for these impacts. We suggest that additional compensation and mitigation measures are included that address the need to minimize impacts to wildlife movement by the inclusion of such measures as wildlife undercrossings and drift fences.

**F-003-007** The document has not provided specific standards for compensation and mitigation by which future specific measures will be based in the Tier 2 analysis. We believe this is an improper deferral of compensation and mitigation measures and suggest that specific standards be developed for acreage and habitat types that will be required to compensate and mitigate for project impacts. We do not believe it appropriate to consider this mitigation measure as anything other than a commitment rather than a consideration.

**F-003-008** The document has failed to identify mitigation measures for any cumulative impacts that can be attributed to this project. Discussion on page 6-3, last paragraph, states that buffers will assure that the project will not contribute to future growth. Buffers do not and will not preclude future growth. However, there is no additional mention of any mechanism by which the future growth will be constrained. We are concerned that given the extent of planned residential development in the area that the pressure for more accessibility to the proposed project is imminent at some point in the future. We suggest, to assure this project does not facilitate additional growth through construction of interchanges, that all proposed buffers be fully protected by establishment of a conservation easement designed to preclude any future urban development or road construction of any kind. This should be included as a commitment in this document.

Alternative Selection

**F-003-009** We do not believe that a quantitative comparison of each alternative corridor alignment, as suggested in this document, provides the most meaningful analysis of project alternatives. In this regard, although the northerly alternatives may impact less acreage and less wetlands, directly, they alternatively provide the greatest degree of habitat fragmentation and thus the highest likelihood of population isolation. The southerly alternatives, and most notably, Alternative 1, although quantitatively may result in greater direct impacts based on some of the metrics used in this document, results in substantially and significantly lower likelihood and less risk of habitat fragmentation and or population isolation. This conclusion is supported by both currently proposed and likely future projects and an analysis of the cumulative impacts of these projects in conjunction with this proposed project. Approval of Placer Vineyards by Placer County assures a large urban development immediately adjacent to the most southerly alignment and thus lands between Alternative 1 and Placer Vineyards are a significant and substantially smaller block of habitats than more northerly alignments. Agency analysis, based upon the ability of each alternative to preserve large blocks of unbroken habitat, suggests that habitat fragmentation would be increasingly severe as alternatives move north. Simply, each alternative bisects the study area resulting in two remaining habitat blocks. The premise that larger habitat blocks result in greater species diversity and higher likelihood of long term conservation is well founded in scientific literature. We believe that consideration of habitat fragmentation and

1 EIS/EIR either assumes that development will be limited to current zoning, or that all project proposals will be approved and developed. In fact, the document considers both possibilities.

The contribution of the Parkway to growth and the location of that growth are specifically discussed in Section 6.1. This analysis includes both qualitative and quantitative data, and concludes that although the Parkway would be growth inducing, its contribution to regional growth may be limited because no interchanges are proposed within areas that are not already approved or proposed for development, and it is likely that much of the approved and proposed development may occur with or without Placer Parkway (pages 6-15 and 6-16). The conclusions of the growth analysis are that the Parkway would hasten growth or contribute to growth in the region, although by 2040 growth would not be expected to greater with the Parkway than without the Parkway (page 6-13).

The MEPLAN analysis (DKS, 2007) described in Section 6.1 and discussed in more detail in response to Comment F-002-002, identifies that the small amount of additional growth that could occur in the study area (moved from elsewhere in the region) would be more likely to occur under a more southerly alternative than a more northerly alternative. The general location of such growth is shown in Tables 3 through 8 and Figures 9 through 16 in the MEPLAN Technical Report.

Additional evaluation of cumulative effects was conducted in response to public comments, as part of the additional analysis described in Master Response 1. The potential fragmentation impacts resulting from growth adjacent to the Parkway corridor alignment alternatives are discussed in that analysis. The analysis is focused on the secondary and indirect effects of growth, and also considers the indirect fragmentation impacts of the Parkway on biological resources.

The additional analysis concludes that indirect effects of fragmentation of



Ms. Celia McAdam

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F-003-009

population isolation is a superior metric when considering selection of a preferred project alternative. Habitat fragmentation was a principal justification for the Federal listing of vernal pool invertebrates (Federal Register 59: 48136-48153).

F-003-010

Additionally, regarding the potential for Placer County to successfully implement the proposed Placer County Conservation Plan (PCCP), as discussed on page 14.14-35, we believe that Alternative 1 would provide a substantially greater opportunity, along with other land in western Placer County, for conservation provided lands north of the alternative were dedicated to long term conservation purposes as proposed in some PCCP alternatives.

F-003-011

Regarding the Natomas Basin Habitat Conservation Plan (NBHCP), the portions of the alternatives east of SR 99 in Sutter County are located in the permitted (for development) area. It is unclear if the portions to the west of SR 99 are permitted for development. Successful implementation of the NBHCP is premised on all the area in the Natomas Basin outside of the permit areas remaining undeveloped for the benefit of the covered species. The DFG and the Service consider all land in the Natomas Basin as habitat for one or more of the covered species. PCTPA should consider what the effect of the loss of this habitat cumulatively with other projects in the unpermitted area will effect implementation of the NBHCP.

Conclusion

F-003-012

We have concluded that Alternative 1 is the superior alternative and recommend the selection of this alternative for Tier 2 analysis. This agency recommendation is consistent with discussions over the last several years during meetings with you and other State and Federal agencies. We believe that the Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers (Corps) have also consistently recommended that Alternative 1 is superior.

Thank you for the opportunity to review this project. If we can be of further assistance, at DFG please contact Mr. Jeff Finn, Environmental Scientist, at (530) 477-0308 or Mr. Jeff Drogensen, Senior Environmental Scientist, at (916) 358-2919 and at the Service please contact Jana Milliken, Acting Sacramento Valley Branch Chief, at (916) 414-6561 or Ken Sanchez, Assistant Field Supervisor, at (916) 414-6622.

Sincerely,



Kenneth Sanchez  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service

Sincerely,



Kent Smith  
Acting Regional Manager  
California Department of Fish and Game

biological resources associated with growth would be least under Alternative 5, similar but slightly greater under Alternative 4, and greatest under Alternative 1. None of the Placer Parkway corridor alignment alternatives would substantially affect the viability of the remaining habitat areas available for conservation. The analysis of stream crossings suggests that Alternatives 4 and 5 would likely have less potential to fragment stream corridors and existing habitat linkages than the other alternatives.

**F-003-006**

Detailed mitigation commitments are not appropriate at this time because the extent and magnitude of the potential project-specific impacts that could be associated with the Parkway are not yet known. Additional design details and resource inventory will be required to determine the appropriate mitigation commitments in consultation with federal and state resource agencies. Biological resource mitigation would be implemented as described in the Draft Tier 1 EIS/EIR, Section 4.14.4. Commitments to exact ratios determined during the Tier 2 process would be based on a detailed assessment of the characteristics of the impacts, the current value of the affected resources, and the types of available mitigation opportunities.

**F-003-007**

Please see response to Comment F-003-006.

**F-003-008**

Please see Master Response 1, which discusses the no-development buffer and control of access to the Parkway. The list of potential land use controls identified in Section 2.2.4.2 of the Draft Tier 1 EIS/EIR presents a range of feasible measures to implement a no-development buffer that could control access to the Parkway. Please see Chapter 2 and Appendix A of this Placer Parkway Corridor Preservation Final Tier 1

Ms. Celia McAdam

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Literature Cited:

U.S. Fish and Wildlife Service. 2005. Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. Portland, Oregon. xxvi + 606 pages.

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EIS/EIR for specific provisions regarding easement language focused on reducing the potential for growth inducement.

**F-003-009**

Habitat fragmentation impacts of the Parkway are discussed in Section 4.14.3.4 of the Draft Tier 1 EIS/EIR, which concludes that all of the Parkway build alternatives would have habitat fragmentation effects and that there would be very limited differences among alternatives.

The assertion that the more northerly alternatives have the greater potential for habitat fragmentation overlooks the current fragmentation of the project vicinity and the projects already proposed for development between the northerly alternatives (e.g., Alternatives 4 and 5) and the southerly alternatives (e.g., Alternatives 1 and 2). Based on these development proposals, land between Alternatives 1 and 5 is not likely to remain completely undeveloped with or without the Parkway. In addition, the regional landscape is not a single block of undeveloped habitat that would be maintained as such with the selection of Alternative 1, as described by the commenter. The regional ecosystems, wildlife movement corridors and watershed hydrology have been substantially altered and fragmented by agricultural practices, rural residential development, roads, flood control features, and land use practices. Although there is a substantial area of undeveloped land north of Alternative 1, this area is fragmented into small land use units that provide contrasting habitats for wildlife. For example, rice fields provide foraging, resting and breeding habitat for migratory waterfowl and other aquatic species, but this habitat type is not used by vernal pool branchiopods. Rice fields, existing roads, and residential developments are barriers to the dispersal of vernal pool species in the project vicinity and substantially reduce the cohesiveness of the existing undeveloped lands between Alternative 1 and Alternative 5.

Please also see response to Comment F-002-012.

Ms. Celia McAdam

State of California  
Office of Planning and Research  
PO Box 3044  
Sacramento, CA 95812-3044

7

#### **F-003-010**

No interchanges are proposed in the Central Segment of the project, west of proposed or planned development. There would be no difference among alternatives in opportunities for successful implementation of the proposed Placer County Conservation Plan (PCCP). With any alternative, the success of the PCCP depends, as the commenter notes, in conserving lands by dedication to long-term conservation purposes. This could occur under any of the Placer Parkway alternatives.

#### **F-003-011**

The portions of the Placer Parkway to the west of State Route 70/99 lie within the Natomas Basin Habitat Conservation Plan (HCP) but not within permitted lands (approximately 18 acres). Representatives of the commenter's staff suggest that an HCP amendment to bring this area into the permit area may be appropriate, with a mitigation ratio higher than that of the permit area. The following is added on page 4.14-36 as a last bullet in Section 4.14.4.4 of the Draft Tier 1 EIS/EIR:

- Enter in consultation with USFWS and CDFG to amend the Natomas Basin Habitat Conservation Plan (NBHCP) to include the portions of the project extending west of SR 70/99, or to provide such other compensation as would meet the intent of the NBHCP with respect to protection of special-status species in the NBHCP service area.

#### **F-003-012**

This comment is noted. The analysis in the Draft Tier 1 EIS/EIR, as modified by the PRD, indicates that Alternative 5 is the Environmentally Superior Alternative under CEQA. Please see Chapter 2 and Appendix A of this Final Tier 1 EIS/EIR, which describe the Least Environmentally

Damaging Practicable Alternative, as determined through the modified National Environmental Policy Act/404 process for Placer Parkway.

**I-001-001**

Please see response to Comment B-002-021.

**Sue Sholtis**

---

.om: Bill Pepoon [bill\_p@adrconsulting.com]

Sent: Tuesday, July 24, 2007 6:16 PM

To: PCTPA

Subject: Placer Parkway

**I-001-001** | Since extensive development will undoubtedly occur along the proposed Placer Parkway corridor, funding for the parkway should come primarily from impact fees on new developments. As a Placer County resident, I simply cannot support this project without assurances that developers will in fact pay their fair share. In the past, new developments have been approved with only minimal concessions to traffic impact. I do not object to growth, and I recognize that growth will continue regardless of whether the Placer Parkway is built. But the recent decision by the Placer Board of Supervisors to deviate from the "Blueprint" makes it clear our elected officials are all too eager to placate developers at the expense of mere taxpayers like me.

Bill Pepoon  
1208 Camino Capistrano  
Roseville, CA 95747  
Phone (916) 233-4490

7/25/2007

**Stan Tidman**

**From:** Don Perera [daperera@juno.com]  
**Sent:** Tuesday, July 03, 2007 7:31 PM  
**To:** Stan Tidman  
**Subject:** Placer Parkway EIR/EIS: 4.8 Traffic

Stan

**I-002-001**

In looking over the Placer Parkway EIR/EIS section on traffic, I noticed that NA showed up in areas of my concern. I am concerned about how the increased traffic created by Placer Parkway will affect the areas in Rocklin from 65 east along Whitney Ranch Blvd/Park Drive(103) and along Valley View Drive (89), listed as Valley View Parkway in the Rocklin FEIR. This part of the traffic flow from Placer Parkway and 65 also runs through the middle of a Senior community and on down Park Dr. past a middle school and high school. Several of the gated entrances out of the Springfield Senior Community are on curves or at the bottom of hills where visibility is difficult. Senior's sight, hearing, and reflexes are not what the used to be, and the combination of limited visibility on Park, along with the lower sensory precept ions, may lead to some problems for the seniors trying to enter and exit Park Dr. The seniors in Springfield are concerned.

The Rocklin DEIR of Jan/2006 indicated an increase of 16,000 vehicles per day along these areas, but the FEIR, just out, reduces this number to 7800 per day. I haven't found out how they came up with the lower figures. When asked about the cumulative affects of Placer Parkway along Whitney Ranch Blvd. and Park Drive, Rocklin indicated they didn't have to worry about it because it wasn't approved yet. This doesn't jibe with my reading of CEQA requirement for cumulative affects.

**I-002-002**

Along with traffic, the seniors living along Park Drive are also concerned about the increased noise levels.

I would appreciate any input you might have on these subjects.

Don Perera  
4000 Silver Star Ct.  
Rocklin, CA 95765  
916-435-1063

PS I was able to access the Placer Parkway EIR/EIS on line. Thanks.

### **I-002-001**

The "NA" was used for 2005 conditions on roadway Segment 103 (Whitney Ranch Parkway east of State Route 65), as well as for Segments 104 and 105, because Whitney Ranch Parkway did not exist in 2005.

Segment 89 was mislabeled and should say "Park Drive west of Valley View Parkway," which is a four-lane roadway. Roadway Segment 111 is "Valley View Parkway east of Park Drive," which is a two-lane roadway. Tables 4.8-8, 4.8-9, 4.8-11, 4.8-12, 4.8-25, 4.8-28, and 4.8-29 have been corrected to re-label Segment 89 and to include volume, volume/capacity and level of service (LOS) information for Segment 111. The revised portions of these tables are included at the end of the responses to this comment letter and in Chapter 4.

The analysis indicates that while all of the corridor alignment alternatives for Placer Parkway would add traffic to Park Drive west of Valley View Parkway, there would not be a significant LOS impact on this roadway segment.

The analysis shows a significant impact on the LOS of Valley View Parkway (Segment 111) under 2040 conditions. This impact was identified in the Draft Tier 1 EIS/EIR (see page 4.8-110) and Tier 2 mitigation considerations for this segment were discussed (see page 4.8-124).

### **I-002-002**

As described in response to Comment I-002-001, volume/capacity and LOS information for Whitney Ranch Parkway and Park Drive were included in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR.

The traffic analysis for Park Drive (Roadway Segment 89), which was

wrongly labeled Valley View Parkway in the Draft Tier 1 EIS/EIR, indicates that daily traffic volume will increase between 2005 and 2020 from 1,100 to between 10,300 and 10,800 on this segment, depending on which build alternative is evaluated. Under the No-Build Alternative and all of the build alternatives there would be an increase in traffic-generated noise levels of approximately 10 A-weighted decibels, indicating that the traffic and associated noise increase would not be a direct result of the Placer Parkway build alternatives but would be due to predicted future growth on the local traffic network, which is expected to occur irrespective of whether or not the Parkway is constructed.

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**Response to Comment I-002-001**

The revisions shown below have been made to Tables 4.8-8, 4.8-9, 4.8-11, 4.8-12, 4.8-25, 4.8-26, 4.8-28, and 4.8-29 to re-label Segment 89 and include volume, volume/capacity, and LOS information for Segment 111.

**Revisions to Table 4.8-8  
Estimated Daily Traffic Volumes for Build Alternatives under 2020 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Daily Traffic Volume	Estimated 2020 Daily Traffic Volumes						
		2005	2020		No- Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<u>6</u> <del>2</del>	9,800	38,100	37,800	37,600	37,500	37,500	37,600
89	<del>Park Drive</del> Valley View Parkway	West of Valley View Parkway <del>Park Drive</del>	<del>4</del> NA	4	<del>1,100</del> NA	10,300	10,800	10,900	10,900	10,900	10,800
96	Watt Avenue	South of Baseline Road	2	6	7,100	<del>10,600</del> 4,900	<del>10,700</del> 4,700	<del>10,600</del> 4,600	<del>10,700</del> 4,500	<del>10,700</del> 4,600	<del>10,700</del> 4,600
98	Watt Avenue	<del>South</del> North of Elkhorn Boulevard	4	6	38,700	<del>51,800</del> 38,000	<del>51,800</del> 38,300	<del>51,700</del> 38,100	<del>51,800</del> 38,000	<del>51,700</del> 38,100	<del>51,700</del> 37,800
111	Valley View Parkway	East of Park Drive	NA	<u>2</u>	NA	<u>15,400</u>	<u>15,700</u>	<u>15,800</u>	<u>15,700</u>	<u>15,700</u>	<u>15,700</u>
<p>Notes:</p> <p><sup>1</sup> +2 = Plus two HOV lanes</p> <p><sup>2</sup> Traffic volumes on state highways are 2004. Counts on some local roadways were taken in 2005.</p> <p>Source: DKS Associates, 2007</p>											

**Revisions to Table 4.8-9**  
**Estimated Change in Daily Traffic Volumes for Build Alternatives under 2020 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Daily Traffic Volume	No- Build 2020 Daily Traffic Volume	Estimated Change in 2020 Daily Traffic Volumes Compared to No-Build Alternative					
		2005	2020			Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<u>6</u> <sub>2</sub>	9,800	38,100	-300	-500	-600	-600	-500
89	<u>Park Drive</u> <u>Valley View</u> <u>Parkway</u>	West of <u>Valley View</u> <u>Parkway</u> <u>Park Drive</u>	<u>4</u> NA	4	<u>1,100</u> NA	10,300	500	600	600	600	500
96	Watt Avenue	South of Baseline Road	2	6	7,100	<u>10,600</u> <u>4,900</u>	<u>100</u> <u>-200</u>	<u>0</u> <u>-300</u>	<u>100</u> <u>-400</u>	<u>100</u> <u>-300</u>	<u>100</u> <u>-300</u>
98	Watt Avenue	<u>South</u> <del>North</del> of Elkhorn Boulevard	4	6	38,700	<u>51,800</u> <u>38,000</u>	<u>0</u> <u>300</u>	<u>-100</u> <u>100</u>	0	<u>-100</u> <u>100</u>	<u>-100</u> <u>-200</u>
<u>111</u>	<u>Valley View</u> <u>Parkway</u>	<u>East of Park</u> <u>Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>15,400</u>	<u>300</u>	<u>400</u>	<u>300</u>	<u>300</u>	<u>300</u>

Notes:  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> Traffic volumes on state highways are 2004. Counts on some local roadways were taken in 2005  
Source: DKS Associates, 2007

**Revisions to Table 4.8-11  
Estimated Volume/Capacity Ratios on Roadway Segments for Build Alternatives under 2020 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Volume/ Capacity Ratio	Estimated 2020 Volume/Capacity Ratios on Roadway Segment						
		2005	2020		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<del>6</del>	0.18	0.71	0.70	0.70	0.69	0.69	0.70
89	Park Drive Valley View Parkway	West of Valley View Parkway Park Drive	<del>4</del> NA	4	<del>0.03</del> NA	0.29	0.30	0.30	0.30	0.30	0.30
96	Watt Avenue	South of Baseline Road	2	6	0.39	<del>0.20</del> 00	<del>0.20</del> 00	<del>0.20</del> 00	<del>0.20</del> 08	<del>0.20</del> 09	<del>0.20</del> 09
98	Watt Avenue	<del>South</del> North of Elkhorn Boulevard	4	6	1.08	<del>0.96</del> 70	<del>0.96</del> 74	<del>0.96</del> 74	<del>0.96</del> 70	<del>0.96</del> 74	<del>0.96</del> 70
111	Valley View Parkway	East of Park Drive	NA	<del>2</del>	NA	<del>0.86</del>	<del>0.87</del>	<del>0.88</del>	<del>0.87</del>	<del>0.87</del>	<del>0.87</del>

Notes:  
 Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> LOSs on state highways are from 2004.  
 Source: DKS Associates, 2007

**Revisions to Table 4.8-12**  
**Estimated Level of Service on Roadway Segments for Build Alternatives under 2020 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Level of Service	Estimated 2020 Level of Service on Roadway Segment						
		2005	2020		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<u>6</u> <del>2</del>	A	C	C	B	B	B	B
89	<del>Park Drive</del> Valley View Parkway	West of Valley View Parkway	<u>4</u> NA	4	<u>A</u> NA	A	A	A	A	A	A
98	Watt Avenue	<del>South</del> North of Elkhorn Boulevard	4	6	F	<u>E</u> C	<u>E</u> C	<u>E</u> C	<u>E</u> C	<u>E</u> C	<u>E</u> C
<u>111</u>	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>D</u>	<u>D</u>	<u>D</u>	<u>D</u>	<u>D</u>	<u>D</u>

Notes:  
NA = not applicable  
Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> LOS on state highways are from 2004.  
Source: DKS Associates, 2007

**Revisions to Table 4.8-25  
Estimated Daily Traffic Volumes for Build Alternatives under 2040 Conditions**

Roadway		Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Daily Traffic Volume	Estimated 2040 Daily Traffic Volumes					
			2005 <sup>4</sup>	2040		No- Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
89	Park Drive Valley View Parkway	West of Valley View Parkway Park Drive	<u>4</u> NA	<u>42</u>	<u>1,100</u> NA	12,700	15,400	15,500	15,500	15,500	15,500
98	Watt Avenue	South North of Elkhorn Boulevard	4	6	38,700	51,500	51,700	51,200	51,500	51,700	51,400
<u>111</u>	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>18,000</u>	<u>20,200</u>	<u>20,300</u>	<u>20,300</u>	<u>20,300</u>	<u>20,300</u>

Notes:  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> Traffic volumes on state highways are from 2004. Counts on some local roadways were taken prior to 2005  
 NA = not applicable  
 Source: DKS Associates, 2007

**Revisions to Table 4.8-26**  
**Estimated Change in Daily Traffic Volumes Compared to No-Build Alternative under 2040 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>4</sup> Daily Traffic Volume	No- Build 2040 Daily Traffic Volume	Estimated Change in 2040 Daily Traffic Volumes Compared to No-Build Alternative					
		2005 <sup>4</sup>	2040			Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
89	Park Drive Valley View Parkway	West of Valley View Parkway Park Drive	<u>4</u> NA	<u>4</u> 2	<u>1,100</u> NA	12,700	2,700	2,800	2,800	2,800	2,800
98	Watt Avenue	South North of Elkhorn Boulevard	4	6	38,700	51,500	200	-300	0	200	-100
<u>111</u>	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>18,000</u>	<u>2,200</u>	<u>2,300</u>	<u>2,300</u>	<u>2,300</u>	<u>2,300</u>
Notes: <sup>1</sup> +2 = Plus two HOV lanes <sup>2</sup> Traffic volumes on state highways are from 2004. Counts on some local roadways were taken in 2005 NA = not applicable Source: DKS Associates, 2007											

**Revisions to Table 4.8-28  
Estimated Volume/Capacity Ratios on Roadway Segments for Build Alternatives under 2040 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Volume/ Capacity Ratio	Estimated 2040 Volume/Capacity Ratios on Roadway Segment						
		2005 <sub>4</sub>	2040		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
89	<u>Park Drive</u> <u>Valley View Parkway</u>	West of <u>Valley View Parkway</u> <u>Park Drive</u>	<u>4</u> NA	<u>42</u>	<u>0.03</u> NA	<u>0.35</u> 71	<u>0.43</u> 86	<u>0.43</u> 86	<u>0.43</u> 86	<u>0.43</u> 86	<u>0.43</u> 86
98	Watt Avenue	<u>South</u> <del>North</del> of Elkhorn Boulevard	4	6	1.08	0.95	0.96	0.95	0.95	0.96	0.95
<u>111</u>	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>1.00</u>	<u>1.12</u>	<u>1.13</u>	<u>1.13</u>	<u>1.13</u>	<u>1.13</u>

Notes:

Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.

<sup>1</sup> +2 = Plus two HOV lanes

<sup>2</sup> LOS on state highways are from 2004.

NA = not applicable

Source: DKS Associates, 2007



**Revisions to Table 4.8-29  
Estimated Level of Service on Roadway Segments for Build Alternatives under 2040 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>4</sup> Level of Service	Estimated 2040 Level of Service on Roadway Segment					
		2005 <sup>4</sup>	2040		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
89	<u>Park Drive</u> <u>Valley View Parkway</u>	<u>4</u> <u>NA</u>	<u>4</u> <u>2</u>	<u>A</u> <u>NA</u>	<u>A</u> <u>C</u>	<u>A</u> <u>D</u>	<u>A</u> <u>D</u>	<u>A</u> <u>D</u>	<u>A</u> <u>D</u>	<u>A</u> <u>D</u>
98	Watt Avenue	4	6	F	E	E	E	E	E	E
<u>111</u>	<u>Valley View Parkway</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>E</u>	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>

Notes:

Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.

<sup>1</sup> +2 = Plus two HOV lanes

<sup>2</sup> LOS on state highways are 2004.

NA = not applicable

Source: DKS Associates, 2007

**Stan Tidman**

---

**From:** Don Perera [daperera@juno.com]  
**Sent:** Thursday, July 05, 2007 7:16 PM  
**To:** Stan Tidman  
**Subject:** Re: FW: Placer Parkway EIR/EIS: 4.8 Traffic

**I-003-001** |

I'm a bit disappointed that the traffic info on Park, Whitney Ranch, and Valley View wasn't in the EIR/EIS. I had emailed my concerns last fall, I believe, and I would have thought someone would have included these areas in the study.

**I-003-002** |

What is the timing of the Final EIR? It's probably several years away so it won't help the residents and seniors living along Park/Whitney Blvd.

**I-003-003** |

The traffic and noise increase along those roads will be very annoying, and possibly a safety problems. Most of thew senior sleep on the Park side of their homes. Their main living area, and back yard areas are also on this side. The City predicts an almost a 25% increase in noise levels, but ,since it is under the 60db threshold, it doesn't matter. The seniors who were sold these homes were not told, or expected, the increases in traffic or noise. There quality of life will be adversely affected. As I said, they are not very happy at these prospects.

Don Perera

**I-003-001**

Volume, volume/capacity, and level of service information for Whitney Ranch Parkway and Park Drive was included in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR and additional information is included in this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR, as described in response to Comment I-002-001.

**I-003-002**

The Placer Parkway Tier 1 Final EIS/EIR is scheduled for publication in November 2009.

**I-003-003**

Please see response to Comment I-002-002.

609 St. Joseph Ct.  
Roseville, CA 95747  
July 16, 2007

ATTN: Stan Tidman

Subpoena for:

Placer County Transportation Agency  
299 Nevada St.  
Auburn, CA 95603

Attn. Executive Director  
Celia McAdam

RECEIVED

JUL 16 2007

P.C.T.P.A.

- I-004-001 | We, the people of the areas that will be impacted by the Placer Parkway, owe it to ourselves and to our children to make sure that their and our health and welfare now and in the future is protected. We want to delay this parkway project until we know the construction costs and the health and welfare damages to be expected.
- I-004-002 | This subpoena requires all documentation, i.e. developer and county contracts, now and in the future, to be freely reviewed by all residents. This includes the use of taxes, hidden taxes, e.g. Mello-Roos bonds, etc.
- I-004-003 | This subpoena, to prevent fraud in costs and land acquisitions, requires all investors to the project and the county to disclose their affiliations.
- I-004-004 | This subpoena requires a detailed plan of each route and its impact on infrastructure and the Parkway access (on ramps and off ramps) and how it will effect local congestion and commute times.
- I-004-005 | This subpoena requires detailed information to be mailed to each resident and business in the effected areas, explaining project time-lines, detailing the impact on the people's health problems (especially that of their children), wet-lands, and farm land.
- I-004-006 | This subpoena requires that no "good old boy" deals can be made until the project has been put to referendum.
- I-004-007 | This subpoena requires that we the people, not the plutocrats, should decide how we spend our money.
- I-004-008 | This subpoena requires that the Placer County Parkway project be held in abeyance until documents can be verified legally. All claims or hearsay is not enough. We want NOTARIZED proof of contracts, deals, and costs.

**I-004-001**

Potential future impacts on public health are evaluated in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR and are described in Section 4.2, Socioeconomics and Community Impacts; Section 4.3, Environmental Justice; Section 4.5, Public Services and Utilities; Section 4.9, Air Quality; Section 4.10, Noise; and Section 4.15, Hazardous Waste/Materials.

Preliminary potential construction costs of the Parkway are presented in Section 2.2.6. Additional evaluation of construction costs will be undertaken at the Tier 2 stage of environmental review.

**I-004-002**

It is unclear as to what subpoena is referenced by the commenter here and in following comments. The Federal Highway Administration, South Placer Regional Transportation Authority, and Placer County Transportation Planning Agency are subject to relevant federal and state requirements for public review of documents related to the project.


Please also see response to Comment B-002-021, which describes funding for the Parkway.

**I-004-003**

Please see response to Comment I-004-002.

**I-004-004**

The location of each of the Parkway corridor alignment alternatives is provided in the Draft Tier 1 EIS/EIR (please see Figure 2-1). Potential impacts of each of these alternatives and associated interchanges, including effects on traffic and transportation, are described in Chapter 4 of the Draft Tier 1 EIS/EIR. For a summary of these impacts, please see

 Jim Hill  
309 Saint Joseph Ct  
Roseville, CA 95747-4842

Cell 916-781-9341  
916-765-3368

the subsection entitled, "Changes in Systemwide Congestion and Delay" on pages 4.8-110 and 4.8-111, and Tables 4.8-30 through 4.8-39.

**I-004-005**

Potential future impacts on public health are evaluated in the Draft Tier 1 EIS/EIR and are described in Section 4.2, Socioeconomics and Community Impacts; Section 4.3, Environmental Justice; Section 4.5, Public Services and Utilities; Section 4.9, Air Quality; Section 4.10, Noise; and Section 4.15, Hazardous Waste/Materials. Potential impacts on wetlands are described in Section 4.14, Biological Resources. Potential impacts on farmland are described in Section 4.4, Farmlands. The preliminary project schedule is described in Section 3.4.

Notice of Availability of the Draft Tier 1 EIS/EIR was mailed to the project mailing list, comprising more than 2,900 owners and/or residents in the study area, agencies, interested businesses, and other individuals. The Placer Parkway project has developed a robust public participation program that has included property owners, local, state, and federal agencies, local jurisdictions, community stakeholders, advisory committees, a project development team, and ongoing interaction with federal agencies. Public outreach has also included informational notices of public meetings, two scoping meetings, two public meetings on the Draft Tier 1 EIS/EIR, newspaper display advertisements, and press releases, all as described in Appendix B.

**I-004-006**

As described in the Draft Tier 1 EIS/EIR, the process for project approval is certification of the Tier 1 EIS/EIR, and approval of the corridor within which the future Placer Parkway would be constructed. These are public processes. At some future date, the Tier 2 process would commence. The project-level environmental document prepared at the Tier 2 stage would also be subject to relevant notice and public comment procedures.

**I-004-007**

Please see responses to Comments I-004-002 and I-004-005.

**I-004-008**

Please see responses to Comments I-004-002, I-004-005, and I-004-006.

SUBMITTED AUGUST 8, 2007 ROSEVILLE PUBLIC INFO.

PETITION TO: THE PLACER COUNTY TRANSPORTATION PLANNING AGENCY

Written by: Debbie Poling, 5530 Sunset Blvd West, Roseville, CA. 95747 (916) 655-3383

We, the undersigned, petition the Placer County Transportation Planning Agency to address the following concerns and recommendations of the residents of Sunset Blvd West and Amoruso Way in regards to the proposed Placer Parkway.

I-005-001

a) Within the project study area, all corridor alternatives converge south of the Amoruso neighborhood. Where the alternatives converge, the future roadway flows north, directly towards Amoruso Way and the homes on Sunset Blvd West before bending sharply to the east towards Fiddymont Road. While Chapter 2 of the environmental document describes the impact study and considerations regarding vernal pools and overall engineering concepts in selecting this specific and single converged roadway alternative, the residents of our community are not assured that a thorough and comprehensive impact study was performed; specifically in regards to further minimizing the impact to our community. As proposed, the corridor would be only ~ 520 ft from some homes on Sunset Blvd West, and not much further away from many other homes. Clearly the residents of our community value our semi-rural lifestyle and, assuming the Parkway is inevitable, we support minimizing any impact to vernal pools and the environment in general. However, we also want to protect our quality of life and minimize the direct impacts to our homes in terms of traffic noise, pollution, roadway/traffic visibility and decreased property values.

Therefore, the undersigned commission the Placer County Transportation Planning Agency to further assess and consider continuing the converged roadway further to the east, away from our homes/neighborhood before curving the roadway to the north and then continuing east. The undersigned are aware of limitations in regards to existing annexed property and planned developments, however we believe the roadway could be threaded between developments and between vernal pools further to the east thus allowing for less direct impact to our community.

Moving the converged roadway any further to the southeast would make a huge difference to the impact to our homes, especially those on Sunset Blvd West. I'm sure members of the Planning Agency would not want a freeway built 500 ft in front of your home...

I-005-002

b) Based on information obtained from various study reports, it appears that the parkway corridor is ~ 1000 feet wide in the section that parallels Sunset Blvd West. Within the Tier 1 review, an approximate 350 ft wide roadway "footprint" was estimated for the four to six lane roadway. The direct placement of the roadway within the 1000 ft corridor, and the engineered design of the curve that brings the roadway parallel to Sunset Blvd West could also greatly impact or minimize the effect on our homes and community.

### I-005-001

The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR acknowledges that viewer exposure and sensitivity in the Eastern Segment would be moderate to high in 2020 (please see Section 4.6.3.3 and Table 4.6-9 on pages 4.6-28 and 4.6-29). With respect to the Amoruso neighborhood, no additional visual impacts are identified in 2040 from the Parkway, although the projected development in the Eastern Segment together with the Parkway would result in high visual impacts, as discussed in Section 4.6.3.5 of the Draft Tier 1 EIS/EIR. The noise contour maps (Figures 4.10-2 through 4.10-6) show that the 66 A-weighted decibel (dBA) contour (the noise level at which an impact exceeds the Federal Highway Administration [FHWA] noise abatement criteria) would not be exceeded at the Amoruso neighborhood or along Sunset Boulevard West in 2020. Table 4.10-5 shows that the noise level in 2020 would not exceed a 12 dBA increase in existing sound levels.

In 2040, the noise contour maps (Figures 4.10-7 through 4.10-11) show that the 66 A-weighted dBA contour would just encroach into the southeastern corner lot at the Amoruso neighborhood and would extend across Sunset Boulevard West. Table 4.10-9 shows that the noise level in 2040 would range from an 11 to 12 dBA increase in existing sound levels, depending on the corridor alignment alternative selected.

During the Tier 2 process, more detailed evaluation will be undertaken to identify potential impacts of a roadway located within this common alignment, including identification of mitigation measures, as appropriate, to provide a significant level of noise reduction for residences and local communities. This could include identifying a particular alignment of the future Parkway within the corridor to reduce impacts.

Placer County Transportation Planning Agency has committed to continue to coordinate with local jurisdictions during the project-level (Tier 2) environmental review to reduce the likelihood of visual and noise

I-005-002

Therefore, the undersigned commission the Placer County Transportation Planning Agency to incorporate the following recommendations into the Tier 2 review/proposals.

- position the ~350 ft roadway within the southeast section of the 1000 ft corridor. This places the actual roadway to the furthest point away from homes on Sunset Blvd West. The placement of the roadway within the southeast portion of the corridor also makes sense in terms of overall engineering design based on the hard arc of the curve.

I-005-003

- build a large earth berm on the northwest edge of the entire curve, sloping the roadway away to the south. The residents of our community are very concerned about traffic noise and visibility, especially at night as traffic flows northwest directly towards the homes on Sunset Blvd West. The glare or visibility to vehicle headlights will be extreme. A large earth berm around the entire curvature, highest as the curve banks sharply to the west, will greatly minimize traffic noise and visibility.

I-005-004

- provide thick, varied and tall landscaping on the northern edge of the corridor, especially as the roadway curves to the northeast and continues parallel to Sunset Blvd West. This will help minimize traffic noise and visibility and will reduce the impacts of pollution. Although sufficient landscaping will not replace the bucolic or pastoral setting we currently enjoy, this will also provide our residents with a more appealing view.

We appreciate your consideration and attention to these concerns.

Thank You,  
The Amoruso Way and Sunset Blvd West Community

impacts (please see Sections 4.6.4.2 and 4.10.4.2). Further mitigation commitments and considerations are described in Sections 4.6.4.3, 4.6.4.4, 4.10.4.3, and 4.10.4.4 for visual and noise impacts, and in similar sections of other chapter with impacts that might affect the Amoruso neighborhood or other residents along Sunset Boulevard West. In coordination with neighborhood representatives, such mitigation could include landscaping screening or a noise barrier.

#### **I-005-002**

At the Tier 2 phase of the project, the environmental analysis would evaluate the location of the Parkway footprint within the 1,000-foot-wide corridor. Various alignments for the roadway will be studied, which may include the location suggested by the commenter. This would include an evaluation of impact(s) to specific properties. Mitigation measures to minimize project impacts would be identified and implemented as part of this process.

#### **I-005-003**

The Tier 2 environmental document would include a more detailed evaluation of the effects of both noise and visual impacts. Specific mitigation measures, such as an earthen berm, would be considered as part of this process. Please also see response to Comment I-005-001.

#### **I-005-004**

During the Tier 2 environmental process, once a corridor alignment alternative has been selected, more detailed analysis of impacts will be undertaken in order to focus on a narrower geographical area and identify specific impacts at a more local level. The Tier 2 environmental document will identify specific measures, such as adjustment of the alignment of the roadway within the selected corridor, or implementation of mitigation measures (including landscaping) to

Petition concerning the Placer Parkway and the documented concerns and proposals brought forth by the residents of Amoruso Way and Sunset Blvd West.

reduce visual or noise impacts, that will help to reduce or avoid adverse impacts on the quality of life of nearby communities. Landscaping measures to be evaluated would include those suggested by the commenter. Please also see response to Comment I-005-001.

NAME	ADDRESS
Chris & Debbie Poling	5530 Sunset Blvd West
Michael Carpenter	5550 Sunset Blvd. West
Anna Carpenter	5550 Sunset Blvd West
Colleen Feaster	5570 Sunset Bl. West
Lynne M. M... ..	5600 SUNSET BLVD WEST
Michael C. Woods	5650 SUNSET BLVD WEST
Jane A. News	5672 SUNSET Blvd WEST
Richard News	5672 Sunset Blvd West
Accesslan Smith	3485 Amoruso Way
Jeff	3485 Amoruso Way
[Signature]	3485 Amoruso Way
[Signature]	3455 Amoruso way
Paul & Wash	3435 " "
Shirley	3431 AMORUSO WAY
Hilda [Signature]	3425 Amoruso WY Rev
Patricia [Signature]	5720 Alameda Rowett Rd.
Way [Signature]	3323 Amoruso WY
[Signature]	3325 AMORUSO WY
James [Signature]	5605 LAETMKE LN
Paul M. Berg	3227 Amoruso Way



Petition concerning the Placer Parkway and the documented concerns and proposals brought forth by the residents of Amoruso Way and Sunset Blvd West.

NAME	ADDRESS
<del>Harold Busby</del>	3227 AMORUSO WAY Roseville
Elizabeth J. Mason	3193 AMORUSO WAY Roseville
<del>Chris Miller</del>	3193 AMORUSO WAY Roseville
<del>Pross Amoruso</del>	3460 Amoruso way Roseville
Devin Pennington	3440 Amoruso Way, Roseville
mailed @ Roseville	3436 Amoruso Way, Roseville
Congie Shaw	3380 Amoruso Way, Roseville
Latti Carlton	3370 AMORUSO WAY Roseville
Clyde Carlton	3370 AMORUSO WAY Roseville
Frank J. N. [unclear]	3350 Amoruso Way, Roseville
<del>Christy</del>	3340 Amoruso way Roseville
D. Shultz	3330 Amoruso Way
John [unclear]	3310 AMORUSO WAY
ARADOLY + SOFTLAND + [unclear]	3260 AMORUSO WAY
Stacy as Minkus	3000 AMORUSO WAY
John [unclear]	3030 Amoruso Way
Dante Ardath Sengul	3050 Amoruso way
Valerie Cannata 10221	3100 Amoruso way
Bob Stycynski	3120 AMORUSO WAY
Charles & Ben Yelke	3130 Amoruso Way

Petition concerning the Placer Parkway and the documented concerns and proposals brought forth by the residents of Amoruso Way and Sunset Blvd West.

NAME	ADDRESS
<u>Jim &amp; Dixie</u>	<u>3331 Amoruso Way Psul. 95747</u>
<u>Claudia Holquin</u>	<u>3141 Amoruso way</u>
<u>Ken &amp; Patty Carlos</u>	<u>5520 Teakberry Pl</u>
<u>Laura Eckroat</u>	<u>3455 Amoruso Way</u>
<u>Meghan West</u>	<u>3200 Amoruso Way</u>
<u>Sam Post</u>	<u>3178 Amoruso Way</u>
<u>Larry Gilbert</u>	<u>3070 Amoruso way</u>
<u>Ruda Thomas</u>	<u>5980 Sunset Blvd W</u>
<u>George Thomas</u>	<u>5980 Sunset Blvd W</u>
<u>Jenna Wilkie</u>	<u>3051 Amoruso Way</u>
<u>Diane Cochran</u>	<u>3009 Amoruso Way</u>
<u>Bud &amp; Julie Siefert</u>	<u>5540 Teakberry Place</u>
<u>Liz &amp; Forest Decker</u>	<u>5905 Laramie Lane</u>
<u>Carrie + Richard Pitkin</u>	<u>5955 Laramie Ln.</u>
<u>Don &amp; Jane</u>	<u>5900 SUNSET BLVD</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

**I-006-001**

These comments have been noted. A discussion of the future availability of fossil fuels and the peak oil issue is provided in Section 3.6.2 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR.

**Sue Sholtis**

**From:** Gunnar Henriouille [gunnarh@cwo.com]  
**Sent:** Wednesday, July 18, 2007 7:30 PM  
**To:** PCTPA  
**Cc:** jnikkel@trpa.org; dickinsor@sacounty.net; dmogavero@mognot.com  
**Subject:** Stan Tidman & Post 911DAY Rerality Checks

PCTPA Boardmembers & Planners; SACOG feedback please:

**I-006-001**

Peaking Oil inexorably becomes more apparent with time. It is now an unavoidable & significant part of USA and other developed countries' foreign (military) & domestic policy factors. Oil security is what it is called...

SACOG and member entities need to share information and expected ramifications of liquid transport fuels shortfalls/disruptions in the road & highways project planning arena.

Alternative transport to guarantee Societal & Commercial Cohesion thru the Oil Interregnum? So far, there is zero to none- the USA must deliberately get to work on the de minimus busing, rail transit & rail freight distribution elements needed to maintain viability of large scale development that has outstripped former rail & transit connectivity.

Rail freight must play a major role in perishables movement, but the local connectivity and truck/rail warehouse interface is nil. I am sorry to be bearer of bad news, and you could understandably dismiss what I am saying. The issue of Peaking Oil & concomitant impacts are not my invention, unfortunately.

All readers, responsables, Chambers of Commerce Boards, Planning Agencies Elecleds and labor organizations need to become Peaking Oil savvy very soon, and make individual investigation of information available.

Best single source document is the Robert L. Hirsch Report On Peaking Oil, & the 2007 update of same. Websites like the (peakoil.net) Association For The Study Of Peak Oil & Gas have compendiums of articles and papers for tracking this study over the last decade or so. Readers are respectively referred to this writers' ASPO article 374, a plan on a page.

This should not be delegated to someone; don't ask anyone to work harder on this than you are willing to do yourself! You owe it to your family to get the truth on Peaking Oil. That puts the job on a share & share alike basis. The information is out there.

There are authorities that can be accessed, and my suggestion is for PCTPA & SACOG, as deliberative bodies, -not a couple of planners- be in touch with Mr. James Woolsey, at Booz, Allen & Hamilton; and also, Matthew Simmons, of Simmons Energy International, in Houston TX. Two significant authorities, from the intelligence gathering community (CIA) and financial system, respectively. Ask them point blank what the USA mode share investment should be from here, into the foreseeable future. Highway, rail, aviation with regards to victuals of life distribution in particular...

This writer has used historical railway footprint & corridor as a starting point in suggesting renewable powered, locally connected railway infrastructure in complement with existing road net now in being.

California's dormant railway corridor is well documented by organizations like the California Railroad Museum, and the Rails To Trails Organization. In fact, Rails to Trails mission is to bank railway corridor for future national emergencies... well, the time is upon us, Ladies & Gentlemen, when we must incrementally and with all due haste rehab much of the rail corridor.

Places like Placerville, Tahoe City, Esparto, Monterey, Isleton, Lincoln, Colfax, Grass Valley, Santa Rosa, even Yosemite! must have rail freight connectivity in event of trucking problems due to fuel allocation. Note some places are on rail still- yes, but lacking freight/container handling.

Assistance is at hand, please begin with honest and due diligence study of the subject, then meet and confer with your respective Boards and civic organizations. Cantarell Oilfield (Mexico) is a miner's canary of sorts for California. It is failing, and may in fact be precursor for regional gas rationing; we shall see.

My apologies for bringing this to your attention like this; all has all been passed to Mike McKeever (SACOG) and TRPA over the last several years, and now it is past time to go around them and get the information to the general planning community ASAP. Thank You.

Gunnar Henriouille, tahoevalleylines.org (530-346-6060)

7/23/2007

Revd 8/13/07

Celia McAdams  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

August 10, 2007

Regarding: Placer Parkway proposed alignment

Dear SPARTA Board Members, Peter Hill, Jim Gray, Primo Santini and Kirk Uhler;

The future quality of my and my family's life is truly in your hands. The impact of a high-speed four to six lane expressway within a few hundred feet of our home will have a significant detrimental impact to us and our neighbors. You have the ability, and I think the responsibility to protect my quality of life, and value to my home by aligning Placer Parkway farther east and south away from our homes. For me, and probably most people, our homes represent perhaps our most significant financial investment. Placing Placer Parkway so close to our homes will have an adverse impact on the value of our homes and our quality of life. We won't have the option of choosing if we want to live near an expressway because the proposed alignment places it directly in front of our home when other alignments are available to the east and south with minimal impacts to current residents. Once the alignment of Placer Parkway is determined, anyone who decides to purchase homes or property near the proposed expressway will do so with the knowledge of its presence. If you approve this proposed alignment, you will not allow me that choice. Is that fair given the available land to the east and south of our homes?

I am strongly opposed to the proposed alignment of Placer Parkway near Sunset Blvd West and Amoruso Way. As I am sure you know, there are nearly 100 homes in the Amoruso Estates area with several of those homes, including mine, facing directly onto Sunset Blvd West (See attached map). Despite previously stated oppositions to the proposed alignment of Placer Parkway at the public meetings in 2005, the only proposed alignment near Sunset Blvd West and Amoruso Way is still within a mere few hundred feet of our homes. Yet the area east and south of Sunset Blvd West and Amoruso Way is virtually void of development or structures and Placer Parkway could easily be located farther south away from our homes. When I raised this issue at the earlier public meetings I was told the proposed alignment minimized the impact to wetland areas. Yet the wetland maps I have examined do not support that statement. If Placer Parkway were to curve to the south farther east of the proposed alignment, it would actually impact fewer wetlands.

I am struggling to understand why the proposed alignment of Placer Parkway is so close to our homes when the land to the south is open and void of development. I believe that the Brookfield developers who own the property south of Sunset Blvd West want to maximize their development potential of this land and the northern alignment

I-007-001

I-007-002

I-007-003

**I-007-001**

Please see response to Comment I-005-001.

**I-007-002**

Curving Placer Parkway in a southward direction farther to the east would conflict with large vernal pools (shown in pink on Figure 4.14-2, Wetland, Riparian, Conservation Areas, and Vernal Complexes) as well as existing and planned development, especially the West Roseville Specific Plan (under construction) and the proposed Creekview Specific Plan (please see Figure 1-15).

Please also see response to Comment I-005-001.

**I-007-003**

Section 2.5 of the Placer Parkway Draft Tier 1 EIS/EIR discusses alignment alternatives in this segment of the corridor. Other alignment alternatives were rejected either because they did not meet the Purpose and Need for the project or did not meet safety or environmental considerations.

Please also see responses to Comments I-005-001 and I-007-002.

I-007-003

preserves more land for them to develop and that has influenced the positioning of the proposed alignment. While I understand the need for Placer Parkway, I strongly believe developer influence and their potential profits should not outweigh your responsibility to preserve our quality of life. I understand the "not in my backyard" mentality and the frustration it causes when planning future projects. However Placer Parkway does not have to be in any current residents "backyard" due to the available and vacant land to the south and east.

I ask you, if you lived in my home, would you support the proposed alignment given the open land available to the south? I truly believe you would not. As a life long Placer County resident and nearly twenty year resident in my current home on Sunset Blvd West, I am urging you to reject this proposed alignment in favor of an alignment that places the 1000 foot wide corridor no closer than 2,500 feet from the residences on Sunset Blvd West.

Thank you for allowing me the opportunity to address this most important decision.

Respectfully,



Joel Neves  
5672 Sunset Blvd West  
Roseville, CA 95747



URS Corporation L:\Projects\Placer\PlacerParkway2007\_28085959\MXD\Curent\Working Documents\IS\IS\Fig\_ES-1\_Project\_Alternatives.mxd Date: 4/17/2007 4:32:22 PM Name: akleebe0

RECEIVED

AUG 15 2007

P.C.T.P.A.

To Celia McAdam

Regarding Placer Parkway

My husband and I lived on Globe Avenue in Sacramento, CA for over 20 years. Our house backed up to Hwy. 160. I can't tell you what the noise was like, the house shaking, the dust, and the pollution. Over the 20 years the traffic went from only 8:00 AM and 5:00 PM, with a few cars during the day and night. By the time we moved to 5550 Sunset Blvd West in 1998 the traffic was constant on Hwy. 160. Our children asked what were all the lights from. This would be cars on the freeway I used to tell them, someday we will move. We put our house on the market in 1998 for \$259,000 and sold it for \$130,000. This was a time when houses were selling. One buyer opened the back door and said no way.

We moved to Sunset Blvd. West because it was a nice neighborhood, it was rural, we can see cows across the road and we could call it home. Even **more important** there was no **freeway** close to our home. We checked very carefully before moving. The acreage across the street was zoned 2.5 acre ranchettes as was the acreage to the east of our neighbor on the left. To the southwest was the Williamson Act. So we felt safe to move here to 5550 Sunset Blvd. West.

- I-008-001** | Now you want to build a Freeway (Parkway) in front of our home, 592 feet from our property line. I attended meetings in Pleasant Grove from the inception of the idea of a freeway going all the way down Sunset to Howsley to Highway 70. The people from Pleasant Grove had a fit as did our neighbors from Amoruso and Sunset Blvd. West. Years went by **and no one has listened to us. So we had no choice except to file a petition on our behalf.**
- I-008-002** | As people were signing the petition all I heard was no one listens to us. Another problem is not everyone is on the mailing list. One person had just built a new house and had no idea. He couldn't believe it. We banded together to press forward the petition so someone will LISTEN TO US.
- I-008-003** | We understand you want an intersection at Fiddymment Road. Why can't you go down Fiddymment, to the south, and then cut over to Hwy. 70. Our petition asked for a southeast direction from our neighborhood. I would hope that if you had to go down Sunset Blvd. West why all the way to our home and community?
- I-008-004** | If you were to build the parkway down Sunset Blvd. West it would ruin our air quality, the noise would be unacceptable, it would effect our biological resources such as the seven special-status species and their habitat; the vernal pool fairy shrimp, Valley elderberry longhorn beetle, Swanson's hawk, white tailed kite, giant garter snake, and Boggs Lake hedge hyssop. There would be a potential loss of vernal species and their habitat. More importantly our property values would depreciate.

#### I-008-001

Please see responses to Comments I-004-005 and I-005-001.

#### I-008-002

Please see responses to Comments I-004-005 and I-005-001. The commenter has been on the mailing list since 2004. At every public meeting and with every piece of mailed information (please see Appendix A of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR and Appendix B of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR for details), the public has been encouraged to sign up for the mailing list; individuals have been added as requested, and the assessor parcel information used to generate the initial mailing list was updated twice. Details of the project, including project status and updates, are also available on the project website:  
[www.pctpa.net/placerparkway](http://www.pctpa.net/placerparkway).

#### I-008-003

Fiddymment Road serves as a needed north-south local arterial. Even if upgraded, it would not meet the Purpose and Need of Placer Parkway, as described in Chapter 2. Please also see response to Comment I-005-001.

#### I-008-004

As described in the mitigation sections of all resource analyses in Chapter 4 of the Draft Tier 1 EIS/EIR, more detailed evaluation will be undertaken to identify specific impacts of a roadway located within this common alignment in the Eastern Segment, including identification of mitigation measures, as appropriate, to minimize potential adverse impacts on residences and local communities. This could include aligning the future Parkway within the corridor to reduce impacts such as noise and air quality. This is discussed in more detail in response to Comment I-005-001.


Most of the people asked if they moved they didn't know where they would go, nor could they afford it.

I-008-005 |

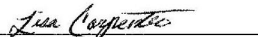
So I am requesting that you move the freeway (parkway) down Fiddymont or to the southeast from our community at least 2 miles or go south!

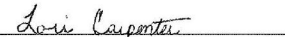
Your consideration would really be appreciated!

The Carpenters

  
Anna Carpenter

  
Michael Carpenter

  
Lisa Carpenter

  
Lori Carpenter

cc: Robert Weygandt  
cc: Ted Gaines

The traffic analysis prepared for the Draft Tier 1 EIS/EIR suggests that, over time, traffic on Sunset Boulevard West itself would increase less under any of the build alternatives than under the No-Build Alternative.

With respect to biological impacts, the Eastern Segment of the Parkway would not affect giant garter snake and elderberry longhorn beetle as no suitable habitat for these species is located within this segment of the corridors. Potential impacts on other threatened and endangered species would be avoided, minimized, and/or mitigated as described in Section 4.14.4 of the Draft Tier 1 EIS/EIR.

With respect to potential property impacts, additional evaluation will be undertaken at the Tier 2 stage.

**I-008-005**

This comment is noted. Please see responses to Comments I-008-001 through I-008-004, above.



Roger & Elaine Karlson  
3247 Amoruso Way  
Roseville, CA 95747

August 13, 2007

Attn: Celia McAdam, Executive Director  
PCTPA  
299 Nevada Street  
Auburn, CA 95603

RECEIVED

AUG 14 2007

P.C.T.P.A.

RE: Placer Parkway Corridor Preservation

Ladies and Gentlemen:

I-009-001

This letter is to urge you to consider carefully when deciding the route of the Placer Parkway Corridor. As an 18-year resident of Amoruso Way, just adjacent to the proposed parkway, I am concerned what criteria you will be using to make the decision of where the parkway will be situated. My understanding was that the decision was going to be based on the preservation of wetlands, however that has proven to be false since more wetlands will be preserved if the parkway is moved farther south. Therefore, one can only presume that the decision will be based on the preservation of land for development. I am asking you to please reconsider this.

I-009-002

Understandably, if a person purchases a home near an airport or other noisy/annoying business they would have no right to complain. For instance, we purchased our home knowing the landfill was within a few miles and we have not objected to the landfill expansion. However, for you to decide to interrupt our chosen way of life (a quiet and country setting) simply so that future residents may be less impacted is unreasonable and unfair. The developer who owns that land will have the choice of building to suit the parkway; a choice we will not have had.

I-009-003

Therefore, I am asking you to please consider the 100 or so residents that have lived in this area for many years – some over 40 years – and move the parkway as far to the south as humanly possible. The deep-pocket developers will still make plenty of money when they develop the land around the parkway.

Thank you for your consideration,

  
Roger & Elaine Karlson

### I-009-001

A variety of considerations will go into selection of a corridor alignment alternative within which Placer Parkway will be constructed. These include minimizing environmental impacts and support by local jurisdictions. Minimization of impacts to wetlands is a consideration, but not to the exclusion of all other factors. Please see Table 4.14-4 in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, which identifies that the southerly alternatives would impact more wetlands than the more northerly alternatives.

### I-009-002

The Placer Parkway has been included as a "plan line" in the Placer County General Plan since 1994, although the exact location was not known. The common Eastern Segment of the Parkway is in its current location for a variety of reasons. Please see response to Comment I-005-001 for more information on this topic, and for potential mitigation measures included in the Draft Tier 1 EIS/EIR.

### I-009-003

Please see response to Comment I-009-001.

RECEIVED

JUL 23 2007

P.C.T.P.A.

John R. Meers  
417 Roan Ct.  
Roseville, CA 95747  
[jrbjm@surewest.net](mailto:jrbjm@surewest.net)

July 19, 2007

PCTPA  
Director Celia Mc Adam  
290 Nevada St.  
Auburn, CA 95603

RE: PLACER PARKWAY

I-010-001

The Placer Parkway should not be built at all in any form. It will open up development in areas that should be left rural and will bring in more traffic than the area can sustain, We are already greatly overcrowded with traffic here in West Placer.

Thank You,



John R. Meers

**I-010-001**

Placer Parkway is intended to reduce future congestion on both the local and regional transportation system. Chapter 1 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR describes the Purpose and Need of the project, part of which is to alleviate future congestion in the Parkway vicinity, which is expected to occur as a result of future employment and population growth in the area, irrespective of Placer Parkway. The traffic analysis prepared for the Draft Tier 1 EIS/EIR (Section 4.8) confirms that traffic congestion would result in unacceptable congestion (Levels of Service E or lower) on numerous roadways in the study area by 2020, with conditions worsening by 2040 in the absence of the Parkway (i.e., with the No-Build Alternative).

**Sue Sholtis**

**From:** Tom & Renee Laffey [laffey@surewest.net]  
**Sent:** Friday, July 13, 2007 10:00 PM  
**To:** PCTPA  
**Cc:** laffey@surewest.net  
**Subject:** Comment on Placer Parkway

Placer County Transportation  
Celia McAdam, Director

Comment to Placer County Parkway draft Tier 1, as published in the Sacramento Bee, July 12, 2007

**I-011-001**

In the interest of managing the current and planned growth on the western side of Roseville and north to Lincoln, we feel Alternative 1 or 2 would be most effective in managing current and future traffic congestion and eliminating the traffic on Baseline/Riego Rd.

Fiddymt Road to Baseline/Riego to highway 99 was never intended to be a major thoroughfare and has become the route of choice for many commuters from West Roseville, Lincoln and North Sacramento into downtown and West Sacramento. This is an increasingly dangerous and ineffective option for the residents of these communities.

F. Renee Laffey  
Tom M. Laffey  
1623 Revere Dr.  
Roseville, CA. 95747

**I-011-001**

This comment has been noted. All alternatives will reduce future traffic congestion on local roadways and will assist in reducing traffic on Baseline/Riego Road. As shown on Table 4.8-25 on page 4.8-77, the more southerly alternatives (Alternatives 1 and 2) would add slightly more traffic to Baseline/Riego Road than the more northerly alternatives (Alternatives 4 and 5). Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

7/16/2007

**Sue Sholtis**

**From:** Phil Zeitman [pjz@surewest.net]  
**Sent:** Saturday, July 14, 2007 9:46 AM  
**To:** PCTPA  
**Subject:** alternatives

**I-012-001**

I'm am in favor of building the Placer Parkway. With all the development going on in Roseville, Rocklin, and Lincoln there has to be an alternative route to 99 and downtown Sacramento. The longer you wait, the harder it will be to purchase the right a way for this road. A prime example is the missed opportunity Sacramento had years ago in developing a North-South route to 50. Clearly, Baseline can not support more traffic and a new road is needed.

**I-012-002**

I am in favor of alternative 5 as it is the most direct route to 99 and it will keep Baseline open for local traffic.  
Phil Zeitman  
7564 Goose Meadow  
Roseville, Ca 95747

**I-012-001**

The commenter reiterates the Purpose and Need for the Placer Parkway project, as described in Chapter 2. This comment is noted.

**I-012-002**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

7/16/2007

**Sue Sholtis**

**From:** Celia Ziegler [cnziegler@hotmail.com]  
**Sent:** Saturday, July 14, 2007 5:31 PM  
**To:** PCTPA  
**Subject:** re Placer parkway alternatives

**I-013-001 |**

Dear Sir:  
As a Roseville resident near the proposed parkway, I favor alternative 2 first, and 4 second.  
Celia Ziegler  
1417 Farmgate Circle  
Roseville, CA 95747

**I-013-001**

The commenter expresses a preference for two specific alternatives. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

7/16/2007

**Sue Sholtis**

---

**From:** Orley Anderson [orba4554@sbcglobal.net]  
**Sent:** Thursday, July 12, 2007 11:00 AM  
**To:** PCTPA  
**Subject:** Placer Parkway

**I-014-001**

The Placer Parkway is certainly a much needed project. Have the powers that be considered making the connection to Hiway 65 at Sunset Blvd.? An overpass, or whatever, is already in the planning stage. Why construct another interchange, which are horribly expensive, up the road a few miles? The casino would greatly benefit from this, and perhaps they would contribute accordingly to this concept. Curious!

Orley Anderson  
4554 Scenic Drive  
Rocklin  
415-0425

**I-014-001**

The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR considered potential alternative connections between the Parkway and State Route 65. As described in Section 2.5.3.3, it is not feasible for the Parkway to connect to State Route 65 at Sunset Boulevard.

Sue Sholtis

**From:** Jack Wallace [jackwallace02@comcast.net]  
**Sent:** Sunday, September 09, 2007 8:16 AM  
**To:** Sue Sholtis  
**Subject:** Re: Notice of Comment Period Extension - Draft Tier 1 EIS/EIR - Placer Parkway Corridor Preservation Project

Sue, I would like this comment included in the final documents. Thanks for your help.

**I-015-001** | I have been following the Placer Parkway project from the beginning, and I am sorry to say that it has evolved exactly as I expected. The original plan was for it to be a straight shot from Highways 65 to 70, with no interchanges between that would induce further growth.

Now the plan is to have interchanges about every mile. How can anyone claim that that is not growth-inducing? It just proves, once again, that the development community totally controls this region.

**I-015-002** | And it will be built to freeway standards so it can become a freeway eventually, but initially will be just an expressway. We all know that it will never expand beyond that.

**I-015-003** | Instead of actually removing existing traffic from the over-crowded roadways, it will simply add more and more traffic as the surrounding land develops.

It will not help our current traffic crisis one iota.

Jack D. Wallace  
1116 Fairfield Avenue  
Roseville, CA 95678  
(916) 782-5924  
jackwallace02@comcast.net

----- Original Message -----

**From:** Sue Sholtis  
**To:** Al Clark ; Terry Davis ; Tom Christofk ; Eric Bryant ; Plato@cwnet.com ; George Alves ; Jack Ritchie ; Jack Wallace ; Joan Powell ; John Costa ; John Tallman ; Julie Hanson ; Mark Quisenberry ; Tim Johnson ; Wendy Gerig ; William Morebeck ; George Brown ; Jeff Finn ; Dave Mason ; John Baker ; Loren Clark ; Patrick Gillum ; Tom Cavanaugh ; Jana Milliken ; John Deeter ; E. Howard Rudd ; Hans Kreutzberg  
**Cc:** Stan Tidman  
**Sent:** Thursday, September 06, 2007 2:00 PM  
**Subject:** Notice of Comment Period Extension - Draft Tier 1 EIS/EIR - Placer Parkway Corridor Preservation Project

Attached for your information is a Notice of Comment Period Extension Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report for the Placer Parkway Corridor Preservation Project, which extends the comment period to September 25.

Feel free to contact our office if you have any questions.

Thank you,

Sue Sholtis  
Placer County Transportation Planning Agency  
(530) 823-4030

9/10/2007

**I-015-001**

The commenter is incorrect in stating that the original plan for Placer Parkway was for it to be a "straight shot" from State Route (SR) 65 to SR 70/99, with no interchanges. As far back as the Conceptual Plan Placer Parkway Interconnect Study (DKS, 2000) and the Placer Parkway Project Study Report (DKS, 2001), Placer Parkway has been identified as a high-speed, limited-access roadway with no interchanges between Pleasant Grove Road and Fiddymont Road. All five build alignments follow this description. Interchanges are not proposed every mile, as stated by the commenter. Please see Section 2.2.3 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR for a discussion of interchanges along Placer Parkway.

**I-015-002**

Please see response to Comment B-002-012.

**I-015-003**

The 2020 and 2040 analyses in Section 4.8 assume substantial development levels in southwest Placer County and South Sutter County and consider conditions with and without Placer Parkway. While some roadway segments would increase in traffic volumes due to Placer Parkway, traffic volumes on a larger number of roadway segments would have decreases. The analysis indicates that Placer Parkway would significantly reduce vehicle hours of delay on the local roadway system, especially in the Analysis Focus Area (AFA). The AFA is the portion of the Transportation Analysis Study Area (TASA) that is close to the build alternatives. The AFA and the TASA are shown on Figure 4.8-1 in the Draft Tier 1 EIS/EIR.

August 21, 2007

Celia Mc Adams  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

RECEIVED

AUG 24 2007

P.C.T.P.A.

Regarding: Placer Parkway

I-016-001

I want to express my concern against the proposed alignment of Placer Parkway so close to my home. I live on Amoruso Way off of Sunset Blvd West. I was not able to attend the public meeting but want you to know I am opposed to the alignment of Placer Parkway in the area of Sunset Blvd West and Amoruso Way. The noise from a freeway so close to my house would be terrible. There is ample undeveloped land to the south where Placer Parkway could be built without having such a negative impact on anyone in the Amoruso Way area. I urge you to carefully look at this area when you decide where to place Placer Parkway so close to our homes. Please do not approve the proposed alignment as it is presented.

Go to any location near a freeway and you will hear what I am talking about. Would you want to live near that? I know that Placer Parkway will probably be built. I'm asking you to move it as far away as possible from our homes. I want to be reasonable but the proposed route is too close to my home and will impact my quality of life. I am a long term Placer County resident and am looking to you to preserve my quality of life.


Thank you,

Eric Ahrens  
3260 Amoruso Way  
Roseville, CA 95747

I-016-001


Please see responses to Comments I-005-001 and I-007-002.



 **Sorry!** When printing directly from the browser your map may be incorrectly cropped. To print the entire map, try clicking the **"Printer-Friendly"** link at the top of your results page.



★ **[3000-3024] Amoruso Way**  
Roseville, CA 95747, US

 **Sorry!** When printing directly from the browser your map may be incorrectly cropped. To print the entire map, try clicking the **"Printer-Friendly"** link at the top of your results page.



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<http://www.mapquest.com/maps/map.adp?formtype=address&addtohistory=&address=%5...> 8/22/2007

August 18, 2007

Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

Subject: Placer Parkway

Ladies and Gentlemen:

RECEIVED  
AUG 20 2007  
P.C.T.P.A.

**I-017-001** | In the 1960's Cal Trans proposed a highway system for the Sacramento Area. One element of the proposed system was a bypass route which would have extended from approximately the junction of I-5 and Highway 99 to I-80 somewhere in the Rocklin, Loomis or Auburn area. The Sacramento area governments, with the encouragement of then Governor Jerry Brown, rejected this visionary proposal after the freeway to the Sacramento Metro Airport was built. Sacramento now has an overcrowded highway system with interchanges that go nowhere or are used for parking lots. I-80 between Roseville and the U.S. 50 junction in downtown Sacramento is overcrowded even at non-peak traffic times.

**I-017-002** | The proposed Placer Parkway appears to be Cal Trans' way of mitigating Sacramento's lack of vision; providing what is essentially a bypass for I-80 Roseville to downtown Sacramento via West Placer and South Sutter Counties. The proposed parkway does not provide direct access into the North Sacramento and North Highlands areas. State Route 99 in south Sutter County is already overburdened. It will not handle the added traffic from the Yuba City, Marysville housing build outs, the proposed "Measure M" development in South Sutter County AND the additional traffic from the proposed Placer Parkway.

There are already several east-west routes that could be improved to provide greater access from West Placer County to Highway 99 without channeling all the traffic in at one location in South Sutter County.

**I-017-003** | There are also North-south corridors in the South Sutter, Western Placer Area; Powertine Road, Pleasant Grove Road, Brewer Road, Dowd Road and Fiddymont Road. Dowd Road should be extended to join North Watt Avenue. Brewer Road should be improved and extended into the Elverta-Rio Linda area. These routes should be minimum access expressways protected from encroaching development, thus providing direct routes from the Western Placer area to Sacramento without putting all the traffic on Highway 99 and with less impact on valuable agricultural resources.

**I-017-004** | The proposed Placer Parkway would principally benefit the South Placer area and Sacramento. It's only "benefits" to South Sutter County are more congestion and greater negative impact on agricultural resources. Placer and Sacramento Counties should provide services to their citizens without impacting South Sutter County.

Sincerely,

Melvin Borgman  
3559 Howsley Road  
Pleasant Grove, CA 95668

cc: Via FAX: (530) 823-4036

**I-017-001**

The commenter refers to a proposal for a bypass route in the region in the 1960s. This comment is noted.

**I-017-002**

A limited number of east-west roadways currently connect western Placer County with State Route (SR) 70/99 in South Sutter County. Improvements to those roadways are included in the Metropolitan Transportation Plan and thus were assumed under the No-Build Alternative for Placer Parkway in 2020 and 2040, as described under the subsection entitled, "Future Transportation System," beginning on page 4.8-17. However, substantial traffic congestion would occur on those roadways even with these planned improvements, and thus additional east-west roadway capacity is needed. In the absence of the Parkway, substantial congestion would occur on SR 70/99 under the 2040 No-Build Alternative.

Section 4.8 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR indicates that Placer Parkway would increase traffic on SR 70/99 and that widening of SR 70/99 would be needed to mitigate the traffic impact of the build alternatives.

**I-017-003**

Figure 4.8-10 shows the 2040 roadway system under the No-Build Alternative, which includes a number of new and improved north-south arterial roadways through west Placer County into north Sacramento County. These planned roadway connections would allow a number of motorists to avoid use of SR 70/99. However, even with the planned improvements to the local arterial roadway system, substantial congestion levels would exist on SR 70/99 under the 2040 No-Build Alternative.

**I-017-004**

Tables 4.8-26 and 4.8-27 in the Draft Tier 1 EIS/EIR indicate that Placer Parkway would decrease traffic volumes on several roadways in South Sutter County, including portions of Riego Road, Sankey Road, Catlett Road, and Pleasant Grove Road.

**From:** Faith Malcolm [mailto:faithhr@gmail.com]  
**Sent:** Thursday, August 09, 2007 1:46 PM  
**To:** Stan Tidman  
**Subject:** property located at 7641 Pleasant Grove Road

Hi Stan,

Thank you for your time last night, here is the APN # 35-273-003  
address 7641 Peasant Grove Road, Elverta CA 95626

I-018-001

I've attached a copy of an assessor's map that I have of the property and on my way home last night as I turned onto Pleasant Grove I set my trip counter to zero, it showed .7 miles to my driveway. The house is closer to the area (if the route used is the one 1/2 mile north of Riego) that is planned for the parkway as the driveway is on the north side of the house which is in the south east corner of the property, my bedroom is about 15 feet away from the south boarder of the property. If I'm correct the 1/2 mile mark would be about .2 miles from my driveway and that would put the parkway approximately 800 + - feet away from my

8/23/2007

Page 2 of 2

bedroom as my property is only 670 feet across the front so 800 feet isn't all the far in comparrison. I would like to know how this would affect me? I have asked when I've gone to the meetings how and all I've been told is that they haven't decided which route that they are going to use. But you can see my concern here because if you lived there I think that you would really like to know if you lived there, if and when you would have a 4 or 6 lane highway moving in right next door.

Faith Malcolm

## I-018-001

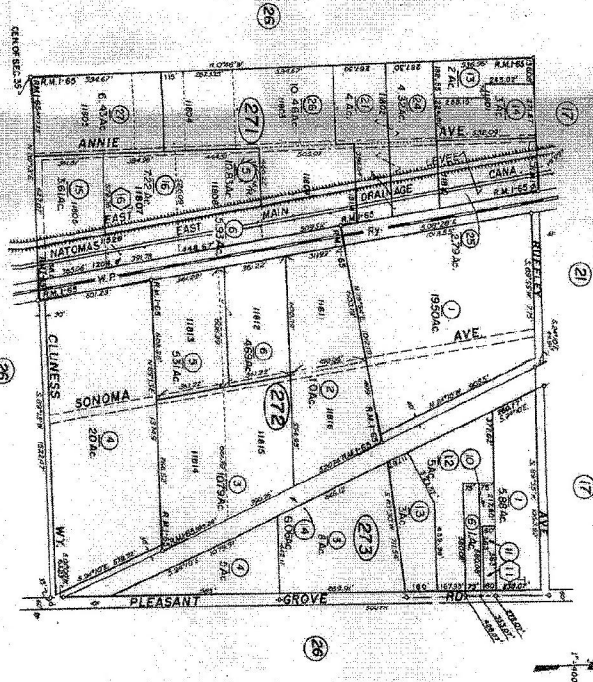
The impacts of each of the build alternatives are disclosed at a Tier 1 level in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. The commenter's residence is located near Alternatives 1, 2, and 3 in an area where the corridor width would transition from 500 feet to 1,000 feet. In the vicinity of the commenter's residence at Pleasant Grove Road, the corridor width would narrow from 1,000 feet (east) to 500 feet (west). The Draft Tier 1 EIS/EIR assumes, for analysis purposes, an approximately 350-foot-wide roadway "footprint" for the Parkway. The future roadway location has not been determined. If one of these corridor alignment alternatives is selected, the roadway location will be based on a separate Tier 2 environmental review, which will include more detailed design and construction information, and will focus on avoiding or minimizing impacts to vicinity resources and development. Because of the nearby railroad and canal, there is the potential that the Parkway could be on a bridge in this area. Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

3K 1, Pg 65

TRANSITORY UNIT

NOTE - Assessor's Book Numbers Span in Ellipse  
Assessor's Parcel Number Shown in Circle

Assessor's Map Bk. 35-Pg. 27  
County of Sutter, Calif.  
2000-1



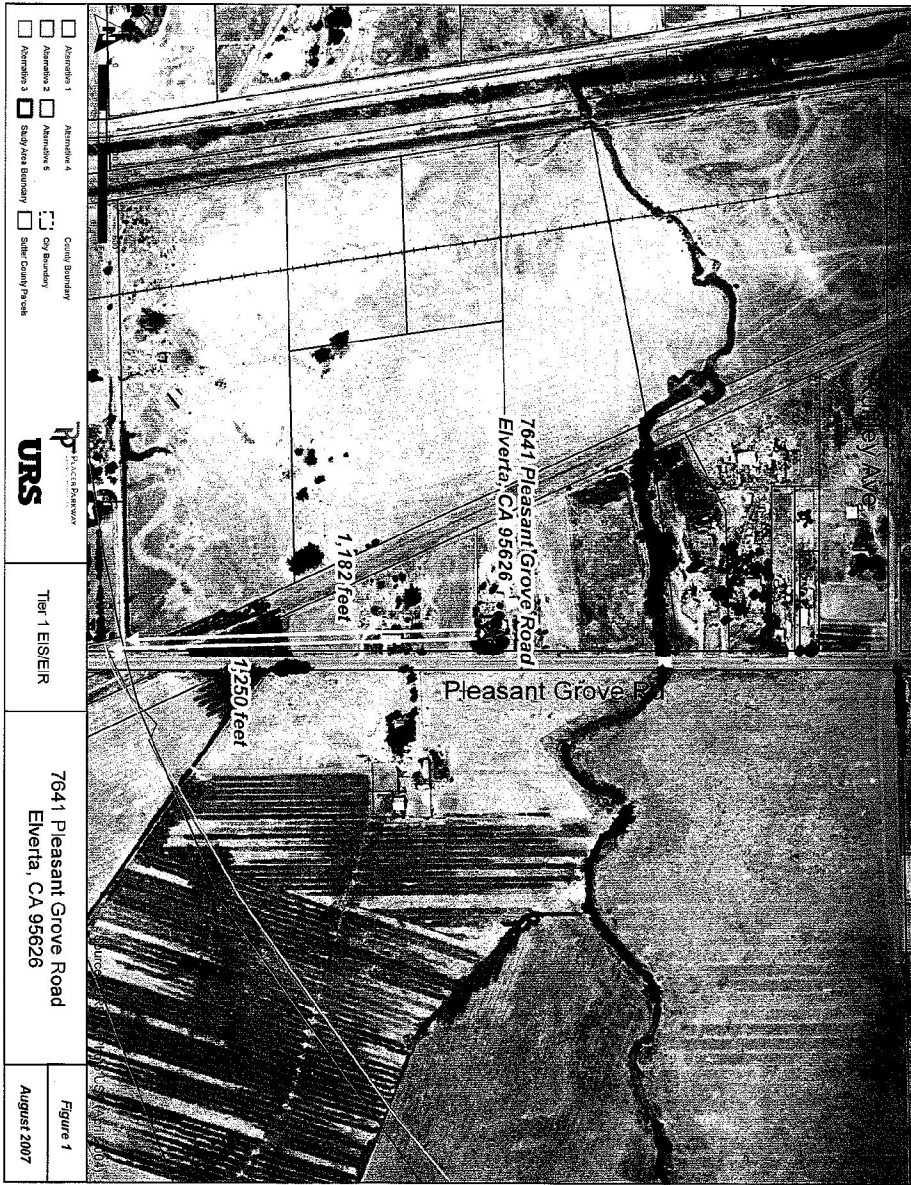
NE 1/4 SEC. 35, T.11N, R.4E, M.D.B.M.

Tax Area Code 67-001 35-27

SITE PLAN

2095713  
03070084

Broker or Owner	Malcolm
Property Address	7641 Pleasant Grove Road
City	Elverta
County	Sutter
State	CA
Zip Code	95626
Land or Caret	Safe Credit Union and Sale



U:\CS Corporation\L1\projects\hrc\enr\arkw\2007\_280562\951\MXD\Analysis\Map\_04\_Homeworker\_7641\_Pleasant\_Grove\_Rd\_09200717641\_Pleasant\_Grove\_Rd.mxd Date: 8/20/07 3:42:43 PM Name: a\klee10

RECEIVED

SEP 26 2007

P.C.T.P.A.

September 25, 2007

Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, Ca 95603  
(530) 823-4030 FAX (530)823-4036  
[pctpa@pctpa.org](mailto:pctpa@pctpa.org); [cmcadam@pctpa.org](mailto:cmcadam@pctpa.org)

Cesar Perez  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
Sacramento, Ca 95814  
(916) 498-5065 FAX (916)498-5008  
[cesar.perez@fhwa.dot.gov](mailto:cesar.perez@fhwa.dot.gov)

**SUBJECT:** Placer Parkway Corridor Preservation Tier 1  
Environmental Impact Statement/Program Environmental Impact  
Report. SCH #2003092069

Dear Agency Representatives,

Thank you for the opportunity to comment on the Placer  
Parkway Tier 1 EIS/EIR.

I-019-001

The Project is identified as an expressway for a freeway  
connection with four-lanes (interim roadway as warranted)  
or as full six-lane facility with "limited access".  
Will it be possible or realistic to limit the access? How?  
Aren't there already large projects approved or planned  
that will need multiple access points? How will these  
large projects and potentially several Universities in the  
area be able to access either State Route 65 or SR 70/99?  
Will all this new traffic continue to clog local roads?

I-019-002

Proposed Mitigation: Tier 2 should design the full six-  
lane facility.

I-019-003

**FREEWAY/HIGHWAY**

I-019-004

Given the amount of growth forecasted for the region, it  
should be a given that more freeway systems, as well as  
rail, light rail or mass transit, are going to be required.

**I-019-001**

Sections 2.2.3 and 2.2.4 of the Placer Parkway Corridor Preservation  
Draft Tier 1 EIS/EIR describe the limited interchange/access concept  
that is a part of the Parkway project. Please see Chapter 2 and  
Appendix A of this Placer Parkway Corridor Preservation Final Tier 1  
EIS/EIR for specific provisions regarding easement language focused on  
reducing the potential for growth inducement.

The potential future construction of additional Parkway interchanges by  
others, including interchanges that may be proposed by proponents of  
other planned/approved development in the Parkway vicinity, will be  
subject to independent environmental review and is not part of the  
project. Potential access to State Route (SR) 65 and SR 70/99  
from such projects is outside of the scope of this Draft Tier 1 EIS/EIR.

**I-019-002**

The 2040 analysis assumes development in all of the proposed and  
possible large developments in southwest Placer County and South  
Sutter County, including two new universities. This analysis shows  
conditions with and without Placer Parkway. While some roadway  
segments would increase in traffic volumes due to Placer Parkway,  
traffic volumes on a larger number of roadway segments would have  
decreases. Tables 4.8-21, 4.8-22, 4.8-38, and 4.8-39, which show the  
projected systemwide vehicle delay, indicate that Placer Parkway would  
significantly reduce vehicle hours of delay on the local roadway system,  
especially in the Analysis Focus Area.

**I-019-003**

The tiering concept and the reasons why a project-level analysis of  
Placer Parkway was not conducted at this time are described on pages  
1-1 and 1-2. The first paragraph of page 1-2 states: "Given the existing  
and projected rapid growth in and around the study area, it is vital to  
select a corridor as early as feasible, so that the location of the future

I-019-004

In close proximity to Alternative 1 there is already potentially 150,000 additional people projected from approved and proposed projects. Once a population becomes 100,000, doesn't it become classified as a Metropolis/ a Metropolitan Zone? Shouldn't planning services and infrastructure to accommodate 100,000 people or more include a freeway system? How can potentially 150,000 people be stuck in what I could call an infill area without a Freeway/Highway circulation element? Where else has recently proposed developments of an additional 150,000 people been put without planning an adequate Freeway-Highway circulation system? The Highway system needs to be expanded to provide more circulation that offers more access and more routes to other areas. These are no longer little cities and towns that can be supported by expressways.

I-019-005

Proposed Mitigation: Designate the Placer Parkway as part of the Highway/Freeway system.

What is the process for designating the Placer Parkway as part of the Highway system? Please apply or propose the Parkway for inclusion in the Highway system. Isn't this possible as a result of environmental impacts identified in the EIS/EIR? If this is not feasible, please explain why? NOTE: The San Jose/Santa Clara County Area added Highways 85 & 87 late in the process at a significantly higher cost to the taxpayers. How are we going to avoid repeating that history in our region?

I-019-006

The circulation pattern in the Sacramento City area has a system of multiple routes to access the freeways that circle the downtown city area. However, Highway 80 goes through the City of Roseville forcing traffic patterns to enter the freeway concentrated all in an overall small stretch of the Highway. Even the Highway 65 relief toward Lincoln takes all that traffic and puts it on or off a small stretch of either Highway 65 or 80 adding again to congestion on a small stretch of freeway.

CONCEPTUAL ROADWAY ELEVATION

I-019-007

Since the study area is comprised of mostly flat terrain, the majority of the Parkway is assumed to be at-grade. Bridges would be used to span certain features and improvements. Wouldn't a Parkway (Highway) with more elevations offer more mitigation to open space, critical lands and agricultural lands?

Placer Parkway can be considered in local jurisdictions' planning decisions. Also, it is important to select a corridor before new development reduces corridor options or increases right-of-way acquisition costs. A tiered approach to Parkway planning was selected in order to address these concerns and select a corridor for the Parkway before design and engineering are initiated. Although some designs for the Parkway have been developed during Tier 1, to the extent required for environmental analysis, such designs are entirely conceptual and are subject to further engineering and refinement during subsequent Tier 2 analysis. Construction-level engineering would not occur until a specific alignment for the Parkway is selected based on the Tier 2 environmental analysis."

A greater degree of engineering design will be prepared for the Tier 2 environmental analysis, so that impacts can be more precisely determined. The Tier 2 analysis will include the evaluation of different alignment locations within the selected corridor and will also evaluate varied roadway configurations as appropriate. The final design will not be completed until the Tier 2 EIS/EIR is certified as complete, so as to minimize costs of redesign that may occur as a result of public and/or agency input during the Tier 2 environmental process.

**I-019-004**

The commenter provides opinions and questions regarding infrastructure planning for growth, and notes that the highway system needs to be expanded to provide more circulation. This view, in general, is similar to the Placer Parkway Purpose and Need, as described in Chapter 2. The comment is noted.

**I-019-005**

The process for designating Placer Parkway as part of the California State highway system does not depend on environmental impacts identified in the Draft Tier 1 EIS/EIR. For a project that is not proposed



**I-019-007** | Just as housing density is increasing and going/building up, maybe an elevated or fly-over design needs to be considered for more of the project site. Since this is an assumption, I am raising this issue now. However, I also understand this may need to be analyzed as part of the design in the Tier 2 document.  
Proposed Mitigation: Do not limit or assume the Parkway (highway) to be at grade. Elevated or Fly-over roads may serve as mitigation for sensitive lands. Wasn't this approach used in Europe to protect and buffer open space and agricultural lands and prevent urban sprawl into those areas?

**ACCESS POINTS AND INTERCHANGES**

**I-019-008** | The project has identified several interchange concept points. Will these or any other access points be intersections with stop lights/signs on the Placer Parkway corridor? Does a 1,000 feet wide corridor allow enough room for traffic to free flow from the access points or interchanges?

**I-019-009** | Proposed Mitigation:  
**I-019-010** | 1. The number of access points needs to be increased - the number of points should still be somewhat limited. However, there are too many projects and people that need improved circulation. Or will the local roads continued to be clogged?

**I-019-011** | 2. The Placer Parkway should not be an expressway that has intersections with stop lights/signs on its route. Design only interchanges or access points without stop lights/signs on the actual expressway. If this is not feasible, please explain why.

**ALTERNATIVES**

**I-019-012** | I don't understand Sutter County's part in the selection of the proposed Placer Parkway Routes. Please explain. Did Sutter County agree with the routes that will go from the Placer/Sutter County lines to SR70/99? Did Sutter County include the Placer Parkway project (or the corridor by another name) in SACOG's MTP 2035?

**I-019-013** | Please identify how much infrastructure; etc. can be accommodated in a corridor 1,000 feet wide? 500 feet wide? Can 1,000 feet wide accommodate 6 lanes of traffic, a central median approximately 100 to 134 feet wide, any

by the California Department of Transportation (Caltrans), a roadway is not part of the State Highway system unless the highway is adopted as a State Route by the California Transportation Commission, with end points as determined by legislation. This process has not occurred and it is unlikely that it will occur.

**I-019-006**

The commenter provides information regarding the regional circulation pattern. This is not a comment on the Draft Tier 1 EIS/EIR and no response is required. The comment is noted.

**I-019-007**

The conceptual elevation of the Parkway is described in Section 2.2.2 of the Draft Tier 1 EIS/EIR. Although the exact elevation of the Parkway has not been studied at the Tier 1 level of analysis, the Parkway is expected to generally be at-grade except when it crosses over two railroads, the Natomas East Main Drainage Canal, Pleasant Grove Creek, and floodplains.

In the Tier 2 process, more detailed consideration would be given as to design of the Parkway, including elevated sections, based on project-specific information that would be available at that time.

**I-019-008**

The Parkway would be designed as a free-flowing high-speed facility and would not have stop signs or lights on the roadway. Detailed design of interchanges, including control of access onto the Parkway, would be developed at the Tier 2 stage of the project.

**I-019-009**

The Parkway would be designed as a high-speed limited access roadway. At the Tier 2 stage and during detailed design, consideration

- I-019-013** | additional buffering and the potential of light rail or some other rapid mass transit project?
- I-019-014** | What types of buffering zones are being planned? If this was in the Tier 1 document, I did not find it addressed.
- I-019-015** | Can a combination of the Alternatives (such as Alt 1 & Alt 5 connected by Alternative 3) be preserved as a multi-corridor approach that may better handle the huge traffic demands that are here now and expected to grow?
- I-019-016** | Why is there only one access Alternative from SR 65? Isn't this access point outside the City of Roseville - in the City of Rocklin? How much of Roseville area traffic will this point capture? Is it reasonable to expect commuters or truck traffic to go north toward Lincoln to end up going south toward Sacramento? This concern has been raised several times in talks with planners or staff. Please explain why another expressway/freeway entry alternative from SR 65 is not proposed to capture the Roseville traffic? If it is not feasible, please explain why? Please identify how much the truck traffic on Blue Oaks Blvd has increased in the last 3 years? 5 years?
- I-019-017** |
- I-019-018** | Although Figure 7-1 identifies the Cities/Towns along with the various Planned/Proposed Development areas, I did not find where it shows the amount of potential population projection numbers that will benefit from the each of the various Corridor Alternatives. Please identify these projections numbers for each Alternative. As an example, most - if not all of the alternatives do not seem to easily accommodate traffic from the highly populated Roseville area (going north to go south). Doesn't Alternative 1 provided the closest access for the residents of Roseville? In my view Alternative 1 seems the most likely corridor to be used by Roseville. Please also include population numbers outside the project site area from Development areas 4, 5-Placer Vineyards, and 6 when calculating population projects for Alternative 1.
- I-019-019** | Mitigation: Request agencies and various jurisdictions to establish a Policy to require new developments to require parallel roads adjacent to the Corridor where possible.
- I-019-020** | In addition to the 1,000-foot wide corridor, Add a landscape corridor to mitigate air quality, sound, and, light and glare.

will be given to ensuring that access onto the Parkway via interchanges is compatible with maintaining the high-speed free-flowing facility. The 500- to 1,000-foot-wide corridor provides a no-development buffer area that may help provide adequate distance between a freeway interchange and the nearest signalized intersections. However, good roadway planning would still be needed to implement access management on local roadways in the vicinity of interchanges along the Parkway.

#### **I-019-010**

Placer Parkway is intended to reduce anticipated congestion on both the local and regional transportation system and accommodate future population growth and associated travel demands. As a high-speed limited access facility, it would reduce Vehicle Hours Travelled in the peak morning and evening commute periods by carrying longer-distance trips that would otherwise use local roadways. The Draft Tier 1 EIS/EIR indicates that Placer Parkway would decrease systemwide delay on the local roadway system, especially in the Analysis Focus Area (please see Section 4.8 of the Draft Tier 1 EIS/EIR for more information).

#### **I-019-011**

Please see response to Comment I-019-008.

#### **I-019-012**

Sutter County has been a partner in the planning of the Placer Parkway concept since the late 1990s. They have participated at the Advisory Committee Level (Technical Advisory Committee, Study Advisory Committee, and Policy Advisory Committee) as well as at Project Development Team meetings held since this project was initiated in 2003. In addition, numerous meetings have been held with Sutter County staff, and in November 2004 a study session was held with the Sutter County Board of Supervisors. They have provided input into the identification of alternatives to study in the Draft Tier 1 EIS/EIR. The

**ALTERNATIVE RECOMMENDATION:**

**I-019-021** | I recommend Alternative 1 for selection as the Placer Parkway Preservation Corridor.

**I-019-022** | To accommodate other future growth, I recommend designating Alternative 5 connecting to Alternative 3 and then with Alternative 1 as another Preservation Corridor to be utilized in the future.  
The time identify another preservation corridor is now. The longer we wait the opportunity may be lost. An example is; Earlier the Placer Parkway was identified as going through the West Roseville Specific Plan, that option has now disappeared with the approval of that project.

**LIGHT RAIL/MASS TRANSIT**

**I-019-023** | Why isn't Light Rail along with a rapid mass transit plan included as part of this corridor preservation concept? This is such a large document; I may have missed where Light Rail might have been addressed. With several Universities planned for this area, shouldn't Light Rail be a high priority and included in the Placer Parkway Corridor?

**MITIGATION:**

1. Plan for Light Rail.
2. Add a Light Rail ROW to the easement in the Corridor preservation. Please explain why this wouldn't be feasible. Wouldn't this help mitigate Air Quality?

**FUNDING**

**I-019-024** | Although congested at times, the current existing development is able to get from SR 65 to SR 70/99. The already approved and currently planned projects will make that impossible.

**MITIGATION:** Develop a Development Pays it's fair share approach.  
Currently an amount "*that was being collected was intended to fund environmental, design, and right-of-way costs only*". This is not adequate for the amount of development that is currently approved and being planned. Please update the fees to include a forecasted amount for the actual construction.

selection of a Placer Parkway route will be made by the Federal Highway Administration (FHWA) and by the South Placer Regional Transportation Authority (SPRTA) Board, considering the input of Sutter County and others. The Sutter County Board of Supervisors will separately consider formal adoption of the selected corridor within its jurisdiction, based on this Final Tier 1 EIS/EIR. Placer County Transportation Planning Agency provided the information to SACOG that resulted in Placer Parkway's inclusion in several of SACOG's MTPs, including the current 2035 MTP.

**I-019-013**

The Draft Tier 1 EIS/EIR identifies a preliminary conceptual roadway cross-section (please see Figure 2-2 on page 2-5). It illustrates both a four-lane configuration (two lanes in each direction) and a six-lane configuration (three lanes in each direction) with a 500- to 1,000-foot-wide corridor, depending on location. The roadway would include a central median approximately 100 to 134 feet wide, except potentially at overcrossings. This would allow shoulders of 50 to 100 feet that accommodate drainage swales, and additional no-development buffers of up to 44 to 344 feet, depending on location. The median is currently intended to remain undeveloped. There would be enough physical space to include light rail or other forms of rapid mass transit within the median, unless precluded by narrow medians at overcrossings, such as at the Union Pacific Railroad in the Eastern Segment, or grade constraints. The third lane in each direction could potentially be dedicated to bus rapid transit or shared carpool/bus rapid transit if traffic analysis shows that such a concept would meet the project's Purpose and Need, including maintaining a travel speed of the overall facility at or near the free flow speed for the Parkway, which on a freeway reflects Level of Service (LOS) C to D conditions.

**I-019-014**

Please see Master Response 1, which discusses the no-development buffer.

**I-019-025** | Second to that concern is information provided at the August 21, 2007 Roseville City Council Meeting for a Special Presentation - Regional Transportation Funding Strategies. Attachment 1 identified SPRTA Board action taken earlier this year. That action reduced Funding for the Placer Parkway from \$50 million to \$10 million. It was explained those monies were needed for a higher, more urgent project. How are these monies going to be recovered for the Placer Parkway Corridor? Please explain.

**I-019-026** | Please analyze and propose adequate transportation impact fees on new development. This should include adequate State Highway Impact Fees - whether the Corridor becomes a Freeway/Highway or not and interchanges that will be required. Analyze the possibility of an increase in funding the additional impact fees when existing approved projects come back to amend their approval for additional units or for increased densities to comply with the Smart Growth Blue Print. Doesn't this open the door to revise their development agreements? Is it possible to create a Policy to capture traffic impact fees if the approved Development is amended or has a provision to apply updated fees? Note: El Dorado County has a State Hwy Impact Fee for new development. Whether or not, this road is part of the State Hwy System, why aren't State Hwy fees being collected in Placer County?

**I-019-027** | A fall 2006 local cable TV broadcast of the Focus program for the City of Roseville gave an overview of some of the projects that have been completed and are under consideration. During that broadcast, Rob Jensen/City of Roseville and Celia McAdams/Placer County Transportation Planning Agency stated that project costs are increasing on average of 10% percent every year. At this rate of cost increases, doesn't this project need to be developer funded and built asap?

**I-019-028** | Various comments during workshops and public hearings have raised the concern about an increase in traffic fees for new development could make affordable housing more difficult to obtain. Analyze the inflation rate of new homes in relationship to paying for increased infrastructure cost at 10% percent a year. At what point is it more practical to bite the bullet?

6

### **I-019-015**

Alternative 3 is actually a combination of Alternative 1 and Alternative 4. An alternative combining Alternative 1 and Alternative 5 was considered by the Advisory Committees and determined not to be needed. Each of the five alternatives considered in the Draft Tier 1 EIS/EIR has been analyzed with respect to its ability to handle traffic demands beyond the year 2040 while meeting the Purpose and Need of the project, and each alternative can handle these traffic demands. Multiple corridors would not be needed to handle future traffic demands.

### **I-019-016**

Chapter 2 of the Draft Tier 1 EIS/EIR describes the project alternatives, the planning history that led to those alternatives, and alternatives that were considered but eliminated from further review. During the planning history, several alternative connections of Placer Parkway to SR 65 were considered and evaluated, including connections at Twelve Bridges Drive, Sunset Boulevard, and Blue Oaks Boulevard. As discussed in Section 2.5.3, those potential connections were eliminated for reasons related to Purpose and Need or environmental considerations. The specific reasons for eliminating those connections, identified in that section of the Draft Tier 1 EIS/EIR, are the following:

- A Placer Parkway connection at Twelve Bridges could not be made due to impacts on large vernal pool complexes west of SR 65.
- A Sunset Boulevard connection at SR 65 was eliminated due to potential impacts on large vernal pool complexes and existing and planned businesses/development.
- Potential more southerly alignments, whether connecting to SR 65 at Blue Oaks Boulevard or at other interchange locations, would require removal of substantial existing development. The resulting impacts and costs make such alternatives infeasible.

With a connection to SR 65 at Whitney Ranch Parkway, the section of

**CONCLUSION**

I-019-029

Given the need for this project, that grows more urgent daily, I urge the responsible agencies to move forward not only with the Tier 1, but also with the Tier 2 Document and funding as soon as possible.

I-019-030

I am recommending Alternative 1.

Thank you for the opportunity to provide these comments and considering my comments during the Review Period. Please excuse me if I may have asked questions that were address in the Tier 1 document. I may have over looked them due to the volume of the document. However, please respond to my questions.

Please notify me and provide a copy of the FEIS/FEIR and any Technical Appendix when it's circulated. I understand I am sharing some comments up-front that can apply now and also may need to be addressed in the Tier 2 document, please include this letter at that time. Thank you.

Sincerely,

Jan McKinsey  
8085 Stagecoach Circle  
Roseville, Ca 95747  
(916 783-9211)

Atch 1: Roseville Council Communication for Aug 21,07

Copy to:  
John Webb, Chief, Office of Environmental Services  
California Department of Transportation (Caltrans)  
2389 Gateway Oaks, Suite 100  
Sacramento, Ca 95833  
(916) 274-0588

(These comments were provided by email/FAX to meet the deadline with a follow-up hard copy sent by USPS)

(file: Placer Parkway EIR Tier 1/ 9-25-07)

Placer Parkway west of SR 65 would carry a high demand—an estimated 68,500 to 71,700 average daily vehicles per day in 2040. Some of that demand would be people traveling between locations in western Roseville and destinations in Lincoln, northern Rocklin, and portions of unincorporated Placer County. While most travelers would not travel out of direction to use Placer Parkway, the large demand for the Parkway would divert a large amount of travel that does not have an origin or destination in Roseville from using Roseville's street system, which meets the Purpose and Need for Placer Parkway.

**I-019-017**

The City of Roseville collects traffic count data on its roadway system but does not separate out truck volumes, which would require the use of "vehicle classification counters." The City conducts traffic counts every few years, with the most recent in 2003 and 2008. The count data below show a substantial change in average daily traffic volumes on Blue Oaks Boulevard. The growth in trucks on Blue Oaks Boulevard over the last three to five years is unknown.

**Traffic Volumes on Blue Oaks Boulevard**

Segment	Daily Traffic Volume 2008	Daily Traffic Volume 2003
Woodcreek Oaks to Foothills	29,500	14,700
Industrial to Washington/SR 65	41,200	31,300

**I-019-018**

Figure 7-1 was intended to show possible locations for a potential Watt Avenue interchange on Placer Parkway for each build alternative. The



## COUNCIL COMMUNICATION

# 1502  
City Clerk Use Only

Meeting Date: August 29, 2007

<b>DATE:</b>	August 21, 2007
<b>TITLE:</b>	Special Presentation – Regional Transportation Funding Strategies
<b>CONTACT:</b>	Rob Jensen, Public Works Director/City Engineer 774-5331 <a href="mailto:rjensen@roseville.ca.us">rjensen@roseville.ca.us</a>

### SUMMARY RECOMMENDATION

This item is being presented for informational purpose only. No action is requested.

### BACKGROUND

The purpose for this presentation is to update the Council on various funding strategies to provide necessary transportation improvements in Placer County and update the Council on possible future Council action on those strategies.

The funding of transportation projects is an important issue within Placer County. The Placer County Transportation Planning Agency (PCTPA) has identified a need for approximately \$5.6 billion in transportation funds through year 2035. With existing revenue sources, Placer County should receive about \$3.2 billion over the next 30 years. Because existing funding sources would fall well short in achieving this funding level, PCTPA has been working with a bipartisan steering committee of local leaders to identify which funding sources could most effectively pay for necessary transportation projects. The committee considered a wide variety of funding alternatives and condensed the large list of potential projects so that the focus would be on "needs" rather than "wants." The steering committee concluded that the best alternative includes increased development impact fees and a transportation sales tax.

### Developer Impact Fees

Currently, the majority of roadway projects within Placer County are funded through local and regional fee programs. Historically, except for some minor exceptions, those fee programs have not collected funds for State facilities such as Interstate 80 and Highway 65. Funds have been collected for Placer Parkway; however, the amount being collected was intended to fund environmental, design, and right-of-way costs only.

Our local Fee Program has been very successful in funding local roadway improvements to accommodate growth within Roseville. Our current Capital Improvement Program identifies roadway needs of approximately \$310 million through 2020. These projects are almost entirely funded through developer paid fees.

### AGENDA ITEM

# 4.1

Atch 2 - (pgs 1-4)

amount of assumed development in 2020 and 2040 was the same for each alternative in the transportation analysis. Table 3-2 shows the projected growth in Placer County and South Sutter County through 2020 and 2040 that was used in the analysis. The travel demand model that was used in the analysis is a regional model that covers the entire six-county SACOG region and includes forecasted growth throughout that region. Full buildout of the Placer Vineyards project was assumed to occur by 2040.

### I-019-019

It is unclear why agencies and various jurisdictions should establish a policy to require new developments to require parallel roads adjacent to Placer Parkway, where possible. The Parkway is intended to be a limited access facility and to relieve congestion on local roadways. Depending on the location and future development, it may be appropriate to develop parallel roads to handle short-trip traffic that might otherwise use the Parkway, but it would be left to each development and the approving agency to determine whether this was desirable, based on individual circumstances. The Draft Tier 1 EIS/EIR acknowledges that parallel roadways to certain other impacted roadways in the study area could alleviate congested traffic conditions. Please refer to Section 4.8.4.3, Tier 2–Mitigation Considerations related to traffic and transportation. In this section, the following strategies are identified:

- Construct a controlled-access roadway parallel to SR 70/99 between Riego Road and Elkhorn Boulevard. The roadway could carry short- to medium-range trips between future growth areas in southern Sutter County and northern Sacramento County that would otherwise use SR 70/99.
- Provide additional north-south capacity on local roadways parallel to SR 65.

### I-019-020

Potential environmental impacts would be avoided, minimized, and/or

In addition to our local fee program, Roseville participates in three regional fee programs; the Highway 65 JPA Fee Program, the City/County Baseline Road Fee Program, and the South Placer Regional Transportation Authority (SPRTA) Fee Program. The Highway 65 JPA was formed to fund the construction of four interchanges along Highway 65. Participants in the Highway 65 JPA include Roseville, Rocklin and Placer County. As these improvements are fully funded in that fee program, the JPA Board is not considering modifications at this time.

The City/County Fee Program was formed to address Roseville's impacts on those portions of Baseline Road and Walerga Road located within Placer County. This fee is collected from new development within Roseville and forwarded to Placer County to help fund the widening of those roadways.

Lastly, the SPRTA Fee Program was adopted within Placer County and was formed to further address regional transportation needs. The initial program included funding for Sierra College Boulevard, the Douglas/180 Interchange, Lincoln Bypass, Placer Parkway (as noted above), and Air Quality Projects. The money collected for air quality improvements was recently allocated to the Interstate 80 Widening Project. Earlier this year, the SPRTA Board took action to further address impacts to state facilities and other regionally significant projects. That action modified the fee program to include several new projects, increase funding for the Lincoln Bypass, and reduce funding Placer Parkway. Those changes are as follows:

- Include the widening of Hwy 65 to six-lanes between Galleria Boulevard and Blue Oaks Boulevard (estimated cost \$50 million)
- Include partial funding for the Rocklin Road Interchange (\$10 million)
- Include partial funding for Auburn-Folsom Road widening (\$7 million)
- Increase funding to Lincoln Bypass from \$10 million to \$30 million.
- Reduce Funding for Placer Parkway from \$50 million to \$10 million.

The reduction in funding for Placer Parkway acknowledged the more immediate need to widen Highway 65. The Board did maintain \$10 million in funding for Placer Parkway to allow the environmental work to continue. Depending on the Specific Plan area, the average total fees paid by new development in Roseville inclusive of local and regional fee programs ranges from a low of \$4929 per dwelling unit equivalent (DUE) to a high of \$8650 per DUE.

Although funding for Placer Parkway was reduced in the SPRTA program, discussions have continued regarding the development of a new fee for future growth areas. This proposed fee, which has been called a "Tier 2 Fee", is currently estimated at \$4000 per DUE and would generate the funding necessary to construct Placer Parkway as a 4-lane roadway between Highway 65 and Highway 99. This fee assumes that Sutter County will implement an equivalent fee for new development in Sutter County along the Parkway Corridor. Implementation of this fee will require Council and Board action from Roseville, Lincoln, Rocklin and Placer County sometime this fall. This fee would be additive to all existing fee programs identified above.

In addition to the Tier 2 fee, it is anticipated that new growth areas will participate in the SPRTA Fee program. As those growth areas are approved, additional projects will be added to the SPRTA fee program including:

mitigated as described in the Draft Tier 1 EIS/EIR Avoidance, Minimization, and/or Mitigation Measures in each technical section (Sections 4.1.14 through 4.16.14).

At the Tier 2 phase of the process, more detailed evaluation will be undertaken to identify specific impacts of a roadway located within the selected alignment, including identification of mitigation measures, as appropriate, to minimize potential adverse impacts on residences and local communities. This could include selecting a particular alignment of the future Parkway within the corridor to reduce impacts associated with noise, visual resources, and air quality.

**I-019-021**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Final Tier 1 EIS/EIR.

**I-019-022**

This comment is noted. The Draft Tier 1 EIS/EIR acknowledges that the purpose of the Tier 1 EIS/EIR process is to identify and preserve a corridor now, as described in Section 1.2.1, Need to Preserve Right-of-Way. Please also see response to Comment I-019-015, above.

**I-019-023**

The Placer Parkway concept would not preclude light rail, rapid mass transit, or bus rapid transit in the future, all of which would help reduce air emissions if ridership were to take single-occupancy vehicles off roadways.

**I-019-024**

Please see response to Comment B-002-021.

- Expansion of I80/HWY 65 Interchange (\$30 million)
- Widening of HWY 65 to six-lanes from Blue Oaks to Twelve Bridges (\$45 Million)
- Widening of HWY 65 to four-lanes from Twelve Bridges to Wise Road (\$50 Million)

Should all of the new growth areas be approved and the SPRTA Board modifies the project list to include those projects listed above, the total funding generated from SPRTA and Tier 2 would be approximately \$600 million.

Transportation Sales Tax

The Placer County Transportation Planning Agency has directed staff to take the appropriate steps to include a half-cent transportation sales tax on the November 2008 ballot. The proposed tax would be for thirty-years and would generate approximately \$1.26 billion dollars. Although a final list of specific projects has not been approved, the tentative list of projects is shown in Table 1.

In addition to the regional improvements identified in Table 1, the tax would also provide a subvention back to each jurisdiction to fund local transportation improvements, including capacity improvements, roadway maintenance, bikeway, pedestrian and traffic calming improvements. For Roseville, the amount of subvention is estimated at \$5.3 million per year. This funding is significant in that it would fully fund our street maintenance program and provide a funding source to address future capacity improvements.

TABLE 1

PROJECT	Estimated Cost	Percentage of Sales Tax
Interstate 80	\$211 million	16.7%
Highway 65	\$50 million	4.0%
I80/HWY 65 Interchange	\$75 million	5.9%
Placer Parkway (6-lanes)	\$85 million	6.7%
State Route 49	\$43 million	3.4%
Local Transit	\$120 million	9.5%
Rail and Bus Rapid Transit	\$89 million	7.0%
Tahoe Subvention	\$30 million	2.4%
Local Subventions	\$480 million	38.0%
Bike/Pedestrian	\$12 million	0.9%
Administration/Financing	\$69 million	5.4%
<b>TOTAL</b>	<b>\$1264 million</b>	<b>100%</b>

Future Council Actions

In order for a Transportation Sales Tax to be included on the November 2008 ballot, State law requires that the Placer County Board of Supervisors along with the majority of the city's representing the majority of the population of the County adopt resolutions supporting including the tax measure on the ballot. In anticipation of this request, at the August 29<sup>th</sup> workshop, PCTPA staff will be seeking comment on the draft list of projects included in the expenditure plan. Later this year, PCTPA staff will present a final expenditure plan to the Council and will be requesting the following action:

**I-019-025**

Please see response to Comment B-002-021.

**I-019-026**

The State of California does not impose developer impact fees for state highways. However, SPRTA has had a regional developer impact program since 2002 that provides funding to specified projects, including state highway projects. The fee program also includes some initial funding for Placer Parkway. The SPRTA program is structured similarly to the developer impact fee program in El Dorado County. Please see response to Comment B-002-021.

**I-019-027**

The Placer Parkway project, like most projects, would cost less if it were constructed sooner. Please see responses to Comments B-002-021 and I-019-026 regarding developer fees.

**I-019-028**

The commenter asks that the inflation rate of new homes in relationship to paying for increased infrastructure cost at 10 percent per year be analyzed. This analysis is beyond the scope of this Tier 1 EIS/EIR. The analysis would in any case be speculative, particularly in today's housing market and financing problems. The transportation agencies (FHWA, Caltrans, SPRTA) acknowledge that land acquisition and construction costs increase over time. As described in the Draft Tier 1 EIS/EIR, one of the purposes of this Tier 1 process is to reserve right-of-way as soon as possible.


**I-019-029**

The commenter urges swift action with Tier 1 and Tier 2. This comment is noted.



- Approval on the proposed expenditure plan
- Recommendation to include a Transportation Sales Tax on the November 2008 ballot.

Respectfully Submitted,

  
\_\_\_\_\_  
Robb Jensen  
Public Works Director/City Engineer

APPROVED:

  
\_\_\_\_\_  
W. Craig Robinson  
City Manager

**I-019-030**

Please see response to Comment I-019-021.

RECEIVED

SEP 25 2007

P.C.T.P.A.

Law Offices of  
GEORGE E. PHILLIPS

2306 Garfield Avenue  
Carmichael, California 95608  
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Telefax (916) 979-4801

September 25, 2007

Ms. Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

**Re: Comments on the Placer Parkway Corridor Preservation  
Project Draft Tier 1 EIS/Program EIR**

Dear Ms. McAdam,

This office represents Ms. Joan Allen and Ms. Sharon Musto, and on behalf of our clients we submit these comments on the Placer Parkway Corridor Preservation Project Draft Tier 1 EIS/Program EIR ("Draft EIS/EIR"). Our clients are the owners of property in unincorporated Placer County located south of Phillip Road, east of Brewer Road and west of Country Acres Lane (APN 017-090-030). This property is approximately 216 acres, and has been historically used for rice cultivation by the Allen family for many years. The property is currently subject to a Williamson Act contract, which creates an agricultural preserve and prohibits development or use of the property for non-agricultural purposes. Of particular concern to our clients is the proposed alternative Alignments 4 and 5. As identified, Alternative 4 would border the southern edge of our clients' property, and Alternative 5 would bisect the property from east to west.

The requirement to analyze a series of project alternatives to satisfy NEPA and CEQA requirements is recognized, and the efforts of SPRTA to identify five alternative routes for the center segment of the proposed Placer Parkway is appreciated. However, we observe the fact that with the exception of Alternatives 1 and 2, the alternative routes selected are all well north of future growth areas in Placer County, particularly the approved Placer Vineyards Specific Plan area.

It is interesting to observe that the 2020 Year Scenario indicates that no development within this timeframe would occur in the Creekview and Sierra Vista Specific Plan areas, the Placer Ranch Specific Plan area, Regional University and Curry Creek. See p. 3-5 of the Draft EIS/EIR. Instead, the Draft EIS/EIR assumes that development would commence after the year 2020, with buildout to occur prior to 2040. This scenario is at odds with the development timeframes

**I-020-001**

The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR analyzes the Parkway project at a conceptual level over a long time horizon. Timing for completion of Tier 1 and Tier 2 environmental review, plus permitting, prior to construction that would itself take a number of years, requires somewhat of a long look at how the development landscape could change over the years. This is explicitly discussed in the Draft Tier 1 EIS/EIR in Section 3.6.1 on pages 3-10 and 3-13.

The Placer Parkway Advisory Committees participated in a series of meetings that culminated in the decision to "bracket" the potential range of regional development levels from a low level to a high level. This information was also shared with and accepted by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency as the project Purpose and Need was developed. The low level, identified as the 2020 development scenario, is represented by buildout of planned residential development within Placer County; this included the initial phase of Placer Vineyards because urban development in the Placer Vineyards area was envisioned in the Placer County General Plan. It also included corresponding retail and other employment growth based upon balancing residential development. Finally, it assumed a straight-line growth rate between Sacramento Area Council of Government's estimates of 2005 development levels and their draft 2032 forecasts outside South Sutter County and Placer County. This is described in the Draft Tier 1 EIS/EIR Section 3.4.1 on pages 3-4 through 3-6 and on Table 3-2 on page 3-7. It was intended as a conservative development scenario.

The decision was made to exclude the large proposed developments (except for a portion of Placer Vineyards for the reason described above) from the 2020 development scenario precisely because their future, while likely, was not certain, at least in the 2020 time frame, particularly when the time frames for their permitting were included. This decision

I-020-001

I-020-001

proposed for these development areas, which indicate that most, if not all, of these development areas would be substantially developed by the year 2020. As a result, the sections of the Draft EIS/EIR that rely upon the defined 2020 Year Scenario for analysis purposes, particularly the Traffic and Transportation section (Section 4.8) are flawed and inaccurate.

The Draft EIS/EIR assumes that the Placer Parkway facility would be operational in the year 2020. If indeed the buildout assumptions for these projects hold true as anticipated, the Placer Parkway would be operational after these development areas are built-out, and thus would be needed immediately to serve traffic demands associated with these projects. Therefore, from a functionality perspective, it makes sense to select an alternative that would effectively serve areas within Placer County that would be developing at the same time as the Placer Parkway facility. Alternatives 1 and 2 serve this purpose, and Alternatives 3, 4 and 5 do not.

I-020-002

The Draft EIS/EIR justifies the selection of corridors (Alternatives 4 and 5) that circumvent growth areas on the basis that access would be restricted along the central section under all Alternatives. We are skeptical that the Placer Parkway would actually be constructed in this manner, because this is contrary to the project purpose. As indicated on Page 1-7:

*The ultimate purpose of the proposed Placer Parkway project is to reduce anticipated congestion on the local and regional transportation system and advance economic development goals in southwestern Placer County and south Sutter County.*

In order for the Placer Parkway to be successful in reducing congestion on surface arterials in Placer County, it must be possible for vehicles to access the Placer Parkway through interchanges. Development is not only planned at either end of the Placer Parkway, it is planned along the center section as well. With the access restrictions identified in the Draft EIS/EIR, the Placer Parkway would not be accessible to most of the future growth areas in Placer County and the City of Roseville, including the Creekview Specific Plan, Curry Creek Specific Plan, Regional University Specific Plan, Sierra Vista Specific Plan, and the Placer Vineyards Specific Plan. This is not realistic. We observe that, for example, the Placer Vineyards Specific Plan EIR includes the Placer Parkway with a Watt Avenue interchange in the Mitigated Transportation Network Scenario.

I-020-003

We are concerned that the Draft EIS/EIR facilitates the selection of Alternatives 4 or 5 by minimizing the impact on agricultural land and resources associated with these Alternatives. The Draft EIS/EIR reduces the assessment of impacts to agriculture to simple math, by only offering a numerical comparison of farmland acreage directly impacted within the footprint of each Alternative. There are several serious deficiencies with this approach. Alternatives 1 and 2 would impact agricultural resources, but these impacts would occur within areas of Placer County where the transition from agricultural to urban use is proceeding

also resulted in the demonstration of the need for Placer Parkway even without these large proposed developments, so that the foundation of the Parkway would not be dependant upon their ultimate approvals. The recent downturn in the housing market reinforces the validity of this decision.

If the proposed developments identified by the commenter (and identified on Figure 1-15 in the Draft Tier 1 EIS/EIR) were to be approved before or in 2020, it is likely that the need for a Parkway would develop in phases, similar to the proposals of most of these developments. Please see response to Comment B-002-012.

Finally, the inclusion of all of the projects identified by the commenter is included in the high level of analysis, identified as the 2040 development scenario. Their impacts are disclosed in the 2040 development scenario, which is the cumulative development scenario, and which presents rather a worst-case analysis of potential development. This is appropriate for a Tier 1 EIS/EIR.

For these reasons, the choice of an alternative may not be decided based upon one view of a development scenario in the short term. The South Placer Regional Transportation Authority (SPRTA) Board will select an alternative based on all input received.

Please also see response to Comment B-002-008.

#### I-020-002

The Draft Tier 1 EIS/EIR provides traffic volume, level of service (LOS) and vehicle delay information for each build alternative. As shown in Tables 4.8-38 and 4.8-39 and discussed on page 4.8-111, all of the build alternatives would substantially reduce vehicle delay on the regional and local roadway system, especially in the Analysis Focus Area, and would thus meet a key purpose of the proposed project. The analysis considers

I-020-003

apace, with or without the Parkway. Alternatives 4 and 5 would place the central section corridor through agricultural areas not envisioned for urbanization under the County General Plan. There is a qualitative difference between these impacts that must be recognized in the Draft EIS/EIR.

I-020-004

Alternative 5 would place the freeway corridor through the middle of our clients' property, eliminating the use of the property for productive agricultural purposes. This is true not only with respect to the portion of the property within the designated corridor, but the remainder as well. Under this Alternative, our clients would be left with two small parcels on either side of the corridor, without connecting access between them. In addition, each of these remainder parcels would be too small in acreage to cultivate efficiently or productively, and thus all agricultural use over the entire existing parcel would be effectively destroyed by this Alternative. Alternative 4 would have a reduced impact on our clients' property compared to Alternative 5, but indirect impacts associated with a freeway corridor along the southern frontage are still significant in terms of the continued feasibility of agricultural use.

I-020-005

The brief (four paragraph) analysis of secondary and indirect impacts of the project on agricultural uses in Section 4.4.3.4 is noted, but this analysis does not capture the critical distinction between short-term impacts in urbanizing areas (under Alternatives 1 and 2) and permanent impacts in permanent agricultural areas (Alternatives 4 and 5). Moreover, the value of agricultural land is not simply assessed in terms of productivity. The Draft EIS/EIR does not recognize the value to the agricultural landowner of future mitigation banking opportunities and conservation easements that would otherwise be available absent a freeway corridor. At present, our clients' property has significant value as a potential agricultural preserve for wetland mitigation purposes and/or Swainson's Hawk foraging habitat. The impact to this value of property within defined corridor alignments is obvious, but it is further unlikely that any resource agency would accept a conservation easement to preserve agricultural land or Swainson's Hawk habitat adjacent to a freeway. This loss, combined with the elimination of agricultural productivity on our clients' property that would result from the Parkway must be analyzed in the Draft EIS/EIR because it would strip our clients of the economic value of their land.

I-020-006

The impact to this value of property within defined corridor alignments is obvious, but it is further unlikely that any resource agency would accept a conservation easement to preserve agricultural land or Swainson's Hawk habitat adjacent to a freeway. This loss, combined with the elimination of agricultural productivity on our clients' property that would result from the Parkway must be analyzed in the Draft EIS/EIR because it would strip our clients of the economic value of their land.

I-020-007

These impacts are made worse by the "No-Development Buffer" described in the Draft EIS/EIR, which would drastically increase the impact of the Placer Parkway project on adjacent properties. We question how this concept is compatible with the purpose of the Placer Parkway, which is to serve the needs of existing and future development, and thus do not believe it is realistic in practice. As stated in the Draft EIS/EIR on page 2-9, the No Development Buffer is intended to accomplish two purposes:

1. Preserve a high-speed facility by preventing unplanned interchanges from being constructed; and,

full buildout of all the projects identified by the commenter in the 2040 scenario and, as noted by the commenter, all of the build alternatives do not include interchange access in the Central Segment.

As discussed in the Project Purpose, the proposed access control on the Parkway is intended to meet several objectives, including (1) maintaining a travel speed at or near the free flow speed and (2) striking a balance among advancing planned job growth along SR 65 and SR 70/99 corridors and avoiding growth inducement in areas not designated for development.

Placer County identified the Mitigated Transportation Network Scenario in the Placer Vineyards EIR to help mitigate traffic impacts from that project. As noted by the commenter, that scenario included the addition of Placer Parkway with an interchange at Watt Avenue. As shown in Tables 7-11 and 7-12 and discussed on page 7-13, vehicle delay would be lower for scenarios with a Watt Avenue interchange than without a Watt Avenue interchange.

**I-020-003**

Pages 4.4-17 through 4.4-21 of the Draft Tier 1 EIS/EIR present a numerical evaluation of potential impacts of the corridor alignment alternatives based on farmland classification and acreage.

In addition, a qualitative and quantitative analysis based on buildout of future land uses in the near term, and cumulatively, was considered for each corridor alignment alternative. Specifically, Section 4.1 of the Draft Tier 1 EIS/EIR addresses potential impacts on the existing land use and the designated land use/zoning within the study area in light of the adopted local guidance documents within the study area. The land use guidance documents evaluated in Section 4.1 include the Sutter County General Plan, the City of Rocklin General Plan, the City of Roseville General Plan, the Placer County General Plan and the Sunset Industrial

I-020-007

- 2. Limit opportunities for growth inducement that might otherwise result from provision of access in areas not planned for growth.

To avoid the concern over "unplanned intersections" being constructed in the future, we would suggest that the intersection locations be defined and analyzed in the Draft EIS/EIR. This would further allow the Placer Parkway facility to be designed in such a manner as to preserve high-speed operation while incorporating intersections as needed. As to the second purpose, the best approach for limiting access to the Placer Parkway from areas not planned for growth is to designate the project corridor within growth areas. A corridor location well north of designated growth areas, combined with a No Development Buffer is an unwieldy and illogical alternative to achieve this purpose. A more sensible approach would be to place the Placer Parkway corridor within the future growth area (Alternatives 1 or 2) and allow these urbanizing areas to make efficient use of the Parkway.

I-020-008

On Page 2-10, the Draft EIS/EIR concludes:

*The proposed no-development buffer zones would serve as an effective land use control, because as a practical matter any additional Parkway access that may be proposed in the future must have physical access to the Parkway and the land immediately adjacent to it. If such land is protected and its use restricted, such additional connections could not be constructed.*

As proposed in the Draft EIS/EIR (see Page 2-10), the No Development Buffer would result in the elimination of future development rights on the impacted land within the buffer area. It is assumed that compensation for this loss would be provided to affected properties, but as explained above the Parkway would also eliminate the feasibility of continued agricultural operations on our clients' property, leaving them with no residual value and amounting to a full taking of their property rights.

I-020-009

Given the costs involved, not only with respect to our clients' property but others as well, the document must analyze whether the No Development Buffer can be carried out. It is not enough to simply conclude that "[i]mplementing the no-development buffer to protect lands will require funding for costs of acquisition, capital improvements, restoration and enhancement, operations and maintenance, easement stewardship, and administrative costs." The Draft EIS/EIR must analyze whether the Placer Parkway could be constructed with a No Development buffer considering the substantial added costs associated with acquisition of development rights or fee title for lands within the expanded buffer area.

We are further concerned that the analysis of growth-inducing impacts in the Draft EIS/EIR is minimized, particularly as it relates to Alternatives 4 and 5. On Page 6-16, it is stated that:

Area Plan. The potential impacts of each corridor alignment alternative are evaluated in terms of the direct conversion of land use; the potential of the project to bisect parcels; the compatibility of the roadway with adjacent land uses; the compatibility of the roadway with proposed land uses (including areas envisioned for urban growth); and the resultant consistency of property with applicable zoning in the Study Area.

Please see response to Comment B-003-002 regarding updated farmland information presented in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD). No additional analysis or change to the Draft Tier 1 EIS/EIR is warranted at this time.

The commenter is incorrect in his assertion that Alternatives 4 and 5 are located in areas not intended for urbanization. Please see response to Comment L-014-006, which discusses the Central Segment in the context of the Placer County General Plan.

**I-020-004**

Effects to the commenter's parcel under corridor alignment alternatives 4 or 5 are acknowledged. In the Tier 2 environmental analysis, when the actual location of the Parkway would be determined, alternatives to minimize effects on agricultural parcels would be considered. Please note that the Parkway itself would be only approximately 350 feet wide somewhere within the selected corridor. If Alternative 5 is selected, the portion of the corridor where the commenter's parcel lies would be placed under a conservation easement as described in Section 2.6 of this Final Placer Parkway Corridor Preservation Tier 1 EIS/EIR, under which open space or continued agricultural use would be specified. For these reasons, a considerably larger portion of the parcel could be available for continued agricultural use by the commenter than suggested by the comment.

The Parkway may create situations where, if left unmitigated, there

I-020-009

*It is unlikely that the choice of one Placer Parkway corridor alignment alternative over another would substantially change expected patterns of growth and development in the study area and the surrounding region.*

Standard land use practice recognizes that patterns of urbanization are significantly influenced by the availability of infrastructure, including major roadways. This concept is imbedded in the CEQA Guidelines, which identify the removal of obstacles to growth through the construction of infrastructure as a growth-inducing influence. See CEQA Guidelines §15126.2(d). We concur with the Draft EIS/EIR's conclusion as it relates to Alternatives 1 and 2, since these alternative routes are placed to serve designated growth areas. However, Alternatives 4 or 5 would place a freeway in an area not planned for urbanization, and would lead to significantly increased pressure for development in this area to capitalize on the investment the Placer Parkway represents. As stated above, we believe this pressure will trump the concept of limited access and the No Development Buffer, and will result in greater conversion of agricultural land than would occur under Alternatives 1 or 2. The Draft EIS/EIR focuses on the comparative impact on agricultural land represented by the footprint of each Alternative, but minimizes the larger impacts associated by the project's influence on regional growth patterns.

I-020-010

For the reasons stated above, we would object to the selection of either Alternative 4 or 5 for the alignment of the Placer Parkway. We believe that Alternatives 1 or 2 represent the preferable alignment for the Placer Parkway corridor, which would be further evident if all appropriate factors were considered in the Draft EIS/EIR.

On behalf of our clients, we appreciate the opportunity to provide comment on the Draft EIS/EIR, and to participate in the planning process for this project.

Very truly yours,



Kevin Kemper

would be remnant agricultural parcels that may no longer be considered adequate for commercial agricultural activities or have access restrictions that may also preclude the capacity of the remaining land to adequately support agricultural uses, as discussed on pages 4.1-33 through 4.1-35 of the Draft Tier 1 EIS/EIR (Alternatives 4 and 5 Land Use Conversion and Potentially Bisected Parcels evaluations, respectively). In these instances, Placer County Transportation Planning Agency has committed to a parcel-specific mitigation strategy, which would be developed and implemented during the Tier 2 analysis. This strategy would be developed to avoid impacts where feasible, ensure existing property owners are compensated, and ensure parcel-specific mitigation is implemented for the potential effect the Parkway may have on the existing viable agricultural use of specific parcels. The mitigation strategies are discussed in detail on pages 4.1-45 through 4.1-47 of the Draft Tier 1 EIS/EIR, as well as in response to Comment I-020-008.

**I-020-005**

With respect to potential secondary and indirect impacts on farmland, including habitat fragmentation that could occur as a result of the project, including project-induced growth, additional analysis was undertaken following publication of the Draft Tier 1 EIS/EIR. This additional analysis, which is presented in the PRD, circulated for public comment on January 30, 2009, provides additional analysis of indirect impacts on farmland (please also see response to Comment I-020-003).

**I-020-006**

As noted above, the land is currently an agricultural property. As such, the Draft Tier 1 EIS/EIR evaluates the potential impacts of the Parkway with respect to existing land uses and land use designations (i.e., the baseline condition). The potential loss of Swainson's hawk foraging habitat associated with the Parkway is described in Section 4.14.3.

Taking of property for the Parkway, and appropriate mitigation and

compensation, are addressed in Section 4.1.4.1. Please also refer to response to Comment I-020-004 for a discussion of the Tier 2 analysis that will be undertaken to compensate existing property owners for the potential effect that the Placer Parkway may have on the use of specific parcels.

**I-020-007**

Interchange locations that are proposed as part of the Parkway are defined and analyzed in Section 2.2.3 of the Draft Tier 1 EIS/EIR. Additional analysis was conducted to consider how the comparison of alternatives would be affected by allowing additional interchanges and development in the no-development buffer area. These analyses are discussed in Master Response 1. Please note that additional interchanges are not proposed. Please refer to response to Comment B-006-003 regarding the effect of the buffer on adjacent property.

The project analysis indicates that Alternatives 1 and 2 will not result in lower growth levels than other alternatives. The relative effects of the alternatives on growth are discussed in Section 6.1 of the Draft Tier 1 EIS/EIR, and in Master Response 1.

**I-020-008**

Page 2-9 of the Draft Tier 1 EIS/EIR shows a key component of the “parkway” concept is “preserving open space and *agricultural uses* [emphasis added] adjacent to the Parkway.” As noted on page 2-10, a number of mechanisms may be used to control development within the no-development buffer so that agricultural use could be maintained within the buffer while still compensating property owners for any potential land use limitations as a result of the buffer.

Potential taking of property is discussed under Section 4.1.4.1, titled Tier 2 – Mitigation Considerations, whereby the Placer County Transportation Planning Agency would prepare parcel-specific mitigation

during the Tier 2 analysis to ensure existing property owners are compensated for the potential effect the Placer Parkway may have on the use of specific parcels. As shown below, this includes rezoning and purchasing remnant parcels no longer viable for agricultural production: “At Tier 2, the identification of bisected parcels would enable parcel-specific mitigation to be developed. Strategies to reduce impacts on individual affected parcels could include providing access between remnant portions of bisected parcels via frontage roads and overcrossings, crafting agreements with agricultural property owners that would include residual rights provisions to encourage continuation of farming activities in the area of the no-development buffer zone that would not be used for the Parkway, or rezoning or purchasing remnant parcels that would no longer be viable for continued use under existing zoning. Any property purchases would comply with the requirements of the Uniform Relocation and Assistance Real Properties Acquisition Act.”

**I-020-009**

Costs involved in acquisition of the no-development buffer are included as part of right-of-way costs in project planning. The relative effects of the alternatives on growth, including how it could be affected by placing the northern corridor alignment alternatives in an area not planned for growth, and allowing additional interchanges and development in the buffer area, are discussed in Section 6.1 of the Draft Tier 1 EIS/EIR, and in Master Response 1.

The commenter is incorrect in his assertion that Alternatives 4 and 5 are located in areas not intended for urbanization. Please see response to Comment L-014-006, which discusses the Central Segment in the context of the Placer County General Plan.

**I-020-010**

This comment is noted. Please see responses to Comments I-020-001 through I-020-009, and Chapter 2 of this Placer Parkway Corridor



Preservation Final Tier 1 EIS/EIR. The SPRTA Board will select an alternative based on all input received.

**I-021-001**

*(Comments made at Public Meeting in Yuba City on August 6, 2007.  
Commenter: Bev Field. See Appendix B for full public meeting transcript.)*

The commenter states that the red route (Alternative 1) would disturb long-held parcels on which sheep ranching has taken place for many years. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

1 are available and listed in the newsletter that we have also  
2 by the door, so again, help yourself to that.

3 So we do have three speaker cards. We would ask that  
4 you come forward here to the lectern and we have the  
5 microphone. We will make a record of your comments and I  
6 will just start with the first speaker here. Ben Field,  
7 Pleasant Grove, and he is to be followed by Leo Trombatore.  
8 So Ben Field? Oh, Bev Field. I'm sorry. We have Denise  
9 keeping time over here just to make sure we are keeping up  
10 with that. Thank you very much.

11 MS. FIELD: I would like to bring your attention to the  
12 word "impact." You spoke a great deal about the word impact.  
13 About 30 years ago, there was a ranch in Pleasant Grove that  
14 was divided for people to buy parcels in that branch, and it  
15 was an old sheep ranch.

16 My family have been shepherders for a long, long while  
17 and we moved to one of the parcels in this ranch and we have  
18 been there since 1975, along with five other families who  
19 moved at the same time and bought the property.

20 As you can notice, I am an elderly lady now, as are all  
21 the other people that moved there. Of those parcels, there  
22 are five hardship parcels in a row between Country Acres and  
23 Brewer Road, and if you choose the red line route, that will  
24 disturb people who have made their lives and developed their  
25 time and their children have come home to build to stay, so

I-021-001

1 that they can stay there.

2 And that is the one comment I would like to make.

3 Impact comes a long way, and I understand the need for the  
4 transportation but understand the need for those of us who  
5 have lived there that long and fought everything, all the  
6 flooding water, everything, and worked to develop our  
7 acreages. It's been our life and you're taking it if you  
8 take that route.

9 MR. HILL: Thank you, Ms. Field.

10 MS. IACOFANO: Very good. Thank you. Leo Trombatore.  
11 Let's go to our next speaker. If you could just state and  
12 spell your name for the record.

13 MR. TROMBATORE: Leo Trombatore, T-r-o-m-b-a-t-o-r-e. I  
14 was the State Director of Transportation under the Deukmejian  
15 administration for five years and I also was the director out  
16 at the Marysville office for 11, and the county for eight  
17 years prior to that. I was transferred here in 1975 and I  
18 live in Yuba City.

19 I want to complement the staff for the excellent work  
20 and presentation that they have made. It's a real tough job  
21 to get anything done these days, but one of the things you  
22 will notice, I have white hair, I am 81 years old. I had 41  
23 years with CalTrans, and many years after that with  
24 consulting engineers, but gentlemen, think big. Don't think  
25 small. We have a tendency to think small. We have a

**I-022-001**

*(Comments made at Public Meeting in Yuba City on August 6, 2007.  
Commenter: Leo Trombatore. See Appendix B for full public meeting transcript.)*

The commenter supports a highway connection between State Route 65 and State Route 70/99, and complements the project team for the work done on the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR and on the presentation at the Public Hearing on August 6, 2007.

1 that they can stay there.  
2 And that is the one comment I would like to make.  
3 Impact comes a long way, and I understand the need for the  
4 transportation but understand the need for those of us who  
5 have lived there that long and fought everything, all the  
6 flooding water, everything, and worked to develop our  
7 acreages. It's been our life and you're taking it if you  
8 take that route.

9 MR. HILL: Thank you, Ms. Field.

10 MS. IACOFANO: Very good. Thank you. Leo Trombatore.  
11 Let's go to our next speaker. If you could just state and  
12 spell your name for the record.

13 MR. TROMBATORE: Leo Trombatore, T-r-o-m-b-a-t-o-r-e. I  
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15 administration for five years and I also was the director out  
16 at the Marysville office for 11, and the county for eight  
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18 live in Yuba City.

**I-022-001**

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20 and presentation that they have made. It's a real tough job  
21 to get anything done these days, but one of the things you  
22 will notice, I have white hair, I am 81 years old. I had 41  
23 years with CalTrans, and many years after that with  
24 consulting engineers, but gentlemen, think big. Don't think  
25 small. We have a tendency to think small. We have a

I-022-001

1 tendency to think that 20 years from now is an eternity. It  
2 isn't. You have to think of a life span.

3 This area is very, very poor in transportation. It  
4 always has been. All of the money that California has has  
5 gone to the metropolitan areas. You have an opportunity to  
6 do something here. I have always thought we should have a  
7 connection with 65 to 99.

I-022-002

8 In 1976-77, I worked with Assemblyman Chappie. We  
9 defined streets and highway codes and it's still there, so  
10 you have some history that you can go to, if you have to.  
11 Albeit, it was down in the Yuba City area, but one of the  
12 things that I think we have got to think about today, since  
13 I've been here now these many years, I've been through two  
14 floods. There is a hell of a lot more people here now than  
15 the first flood and the second flood. This will give you an  
16 opportunity to move people, if you have to, in different  
17 directions. You never know in this flatland where you're  
18 going to have a problem.

19 The last flood we had, we came within that many seconds  
20 of closing every road to Sacramento completely. Yuba City  
21 was blocked off, and I keep telling people, you have to think  
22 about how you're going to handle this. Well, all they think  
23 about is, "Well, we will have a police department handle  
24 that." That is not going to do it. You have got to have  
25 some road space and I think you have a chance to do something

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1 here.

## I-022-002

It is acknowledged that Placer Parkway could provide another route for evacuation during floods. Please note that part of the Parkway would be located within floodplains, especially in Sutter County. Potential impacts on hydrology and floodplains, including flooding, are discussed in Section 4.11.3 of the Draft Tier 1 EIS/EIR. Measures that would be implemented to reduce these impacts are described in Section 4.11.4. At the Tier 2 phase of the project, the environmental analysis would include an evaluation of impacts for the actual roadway alignment in more detail. The Tier 2 document will identify specific measures, such as adjustment of the alignment of the roadway within the corridor, or implementation of mitigation measures, including roadway design features such as bridges, and water control structures such as retention basins, to decrease potential flooding impacts, as warranted.

I-023-001

2 I think my three minutes are up, so thank you.  
3 MR. HILL: Thank you.  
4 MR. IACOFANO: Thank you very much. We appreciate that.  
5 George Carpenter is the next speaker and those are the only  
6 cards I have. If anyone does wish to speak, we will take  
7 your cards here and staff have additional cards, so please  
8 feel free. Go ahead, sir.  
9 MR. CARPENTER: Thank you. I am George Carpenter.  
10 Mr. Chairman and Directors. I am happy to be here tonight.  
11 I represent the Sutter Point Specific Planned Owners Group  
12 and that is a group of developers that has approximately  
13 6,000 acres of the 7,500 acres, specific planned area in  
14 South Sutter County, and this planning effort is a result of  
15 an advisory measure voted on by Sutter County voters in  
16 November of 2004. It was passed by a 60/40 vote that advised  
17 the Board of Supervisors to plan a misuse community in south  
18 Sutter County, and since that time we have submitted a  
19 general plan and are working on a land plan for about the  
20 last two and a half years in this area.  
21 As part of our planning effort, we have always known the  
22 Placer Parkway was a potential, and so in our planning  
23 effort, we have reserved rights of way and we have reflected  
24 the potential for Placer Parkway to come through our planning  
25 area, but we have done so only using the Sankey Road

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1 alignment, and that is the alignment that I would urge the

### I-023-001

*(Comments made at Public Meeting in Yuba City on August 6, 2007.  
Commenter: George Carpenter. See Appendix B for full public meeting transcript.)*

The commenter notes that planning for the Sutter Pointe Specific Plan has included a Placer Parkway located along Sankey Road. This comment is noted. In comments on the Draft EIR for the Sutter Pointe Specific Plan, dated February 2, 2009, Placer County Transportation Planning Agency noted this point as a potential issue.

**I-023-002**

Please see response to Comment B-005-002.

**I-023-001**

2 Board of Directors to adopt as part of their Tier 1 proposal,  
3 and in our planning effort, we had to look at what made the  
4 most sense for the location of the Placer Parkway facility,  
5 and it was clear to us that the Sankey Road alignment was the  
6 better alternative.

7 When you look at the environmental review documents,  
8 like Mr. Tidman said, it's the environmentally superior  
9 alternative. It also -- from an environmental standpoint, it  
10 conflicts least with proposed land use plans and that is  
11 least impacted on existing transportation facilities or  
12 planned transportation facilities.

**I-023-002**

13 Right now we are looking into getting a Riego, 99  
14 interchange built and a Riego Road alignment, which would be,  
15 I think, Alignments 1, 2 and 3. It would probably be  
16 significantly conflicted with the Riego, 99 interchange that  
17 we are working on getting down there now. That is an  
18 existing facility that is needed to help South Placer traffic  
19 get down to Sacramento and Sacramento get to South Placer for  
20 jobs.

21 So with that, I would urge your Board, when looking at  
22 the best environmental alternative, and evaluating the  
23 document, to look at that Alignment 4 or Alignment 5 that  
24 uses Sankey Road.

25 There will be a couple of minor technical issues that we

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1 will point out and comment on, but I won't bring those issues  
2 up to you tonight.

I-024-001

13 quick. Olga Widnes.  
14 MS. WIDNES: Good evening and thank you. I will be  
15 brief. I just wanted to mention that 11 years ago, my  
16 husband, Claude and I moved here from Marin County. We now  
17 reside at Sunset Roseville. There are about 3,000 plus  
18 homes, a small area. There was nothing around here, and I  
19 mean nothing. The closest store was Albertson's, and I said,  
20 oh, my God. I can't go all the way there for bread and milk,  
21 you know, and look at it today. It's amazing what has  
22 happened in this area. It's wonderful. The growth and all  
23 the stores and everything that we have had, and I think this  
24 Placer Parkway is the answer to everything that we need here.  
25 I think it's a wonderful idea and I wish you the best of luck

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1 with it. God speed. Thank you.  
2 MS. MCADAM: I actually have no other speaker cards.  
3 MR. HILL: We had three in Yuba City. Come on, folks.  
4 Nobody else?  
5 MR. GRAY: Somebody get up and say something.  
6 MR. HILL: Okay. Going, going. Come on up and speak  
7 and then you can fill the card out after you speak.  
8 MR. POLING: My name is Chris Poling and I live at  
9 5530 Sunset Boulevard West, and I am really speaking on  
10 behalf of my wife and neighbor, who took the initiative to  
11 put together some comments for your consideration. It's in  
12 the form of a petition, and essentially what it says, or I

**I-024-001**

*(Comments made at Public Meeting in Roseville on August 8, 2007.  
Commenter: Olga Widnes. See Appendix B for full public meeting  
transcript.)*

The commenter expresses support for Placer Parkway. This comment is noted.



**I-025-001**

*(Comments made at Public Meeting in Roseville on August 8, 2007.  
Commenter: Chris Poling. See Appendix B for full public meeting transcript.)*

Please see responses to Comments I-005-001 through I-005-004.

13 quick. Olga Widnes.  
14 MS. WIDNES: Good evening and thank you. I will be  
15 brief. I just wanted to mention that 11 years ago, my  
16 husband, Claude and I moved here from Marin County. We now  
17 reside at Sunset Roseville. There are about 3,000 plus  
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10 behalf of my wife and neighbor, who took the initiative to  
11 put together some comments for your consideration. It's in  
12 the form of a petition, and essentially what it says, or I

I-025-001

I-025-001

13 should preface this with saying it may not be within this  
14 scope of Tier 1, but the main point that it's looking at is  
15 the area of the corridor which is outside of the  
16 alternatives, which is east, the section between Fiddymont  
17 Road and Ameruso, (phonetic) the neighborhood there, and what  
18 we are concerned about is the impact of the parkway, how  
19 close it comes to the proximity to our neighborhood, the  
20 Sunset Boulevard and Ameruso community, so I just want to  
21 submit this for your consideration, and I am not sure where  
22 it will fall into this process, but that is essentially it.

23 MS. MCADAM: You can submit those and they will be part  
24 of the record, all written testimony.

25 MR. HILL: Anybody else? Okay. Thank you very much for

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1 coming. The public record is closed. Thank you all for  
2 coming.

3 (The record concluded at 7:30 p.m.)

4  
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11  
12  
13

Municipal Services Agency

Department of Transportation  
Tom Zlotkowski, Director



County of Sacramento

Terry Schutten, County Executive  
Cheryl Creson, Agency Administrator

July 12, 2007

Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603  
Attention: Ms. Celia McAdam  
Executive Director  
Email: pctpa@pctpa.org

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JUL 16 2007

P.C.T.P.A.

SUBJECT: Review Comments on Draft Placer Parkway Corridor Preservation Teir1 EIS/PEIR.

Dear Ms. McAdam:

The Sacramento County Department of Transportation has reviewed the Draft Tier 1 Environmental Impact Statement (EIS)/Program Environmental Impact Report (PEIR) for the Placer Parkway Corridor Preservation dated June 29, 2007. We appreciate the opportunity to review this document and would like to offer the following comments:

L-001-001

1. Page 4.8-9. In the Table 4.8-2, according to County of Sacramento Traffic Impact Analysis guidelines, maximum daily volume per lane for arterial with low access control for LOS D is 6,750 not 6,870.

L-001-002

2. Page 4.8-25. Under section 4.8.3.2 Evaluation Criteria, please add a bullet item description for Sacramento County.

L-001-003

3. Page 4.8-38. In the Table 4.8-8, roadway segment 96 and 98, 2005 daily traffic volumes are greater than 2020 estimated daily traffic volumes (EDT) under all alternatives. Please correct and update the corresponding tables.

L-001-004

4. Page 4.8-31. In the Table 4.8-8, at location 109, 16<sup>th</sup> street should be a 4-lane arterial with moderate access control with 9,000 maximum number of vehicles per lane. Please revise the model run assuming 4-lane 16<sup>th</sup> Street and update the results.

L-001-005

5. Page 4.8-81. In the Table 4.8-25, at location 109, 16<sup>th</sup> street should be a 4-lane arterial with moderate access control with 9,000 maximum number of vehicles per lane. Please revise the model run assuming 4-lane 16<sup>th</sup> Street and update the results.



"Leading the Way to Greater Mobility"

Design & Planning: 906 G Street, Suite 510, Sacramento, CA 95814 . Phone: 916-874-6291 . Fax: 916-874-7831  
Operations & Maintenance: 4100 Traffic Way, Sacramento, CA 95827 . Phone: 916-875-5123 . Fax: 916-875-8363  
www.sacdot.com

### L-001-001

The commenter is correct that the maximum volume per lane for arterials with low access control is 6,750, not 6,870. This is a typographical error in Table 4.8-2 in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. Please see Revised Table 4.8-2 at the end of responses to this comment letter and in Chapter 4. The correct threshold was used in the analysis and the impact analysis was not affected by this error.

### L-001-002

The following language is added to the Evaluation Criteria in Section 4.8.3.2 to reflect the analysis conducted for the Draft Tier 1 EIS/EIR:

- In unincorporated Sacramento County the proposed project would cause a roadway segment operating at LOS E or better conditions to deteriorate to LOS F conditions. If a roadway segment already operates below the LOS E standard, the proposed project would cause roadway operations to deteriorate by one grade or cause the volume to capacity ratio to increase by at least 0.05.

### L-001-003

The daily volume information shown in Table 4.8-8 is corrected in Revised Table 4.8-8, provided at the end of responses to Comment Letter I-002, and in Chapter 4. While the estimated volumes on Watt Avenue were adjusted to reflect existing traffic count data, it should be noted that:

- By 2020 a portion of the Placer Vineyards development was assumed to have been constructed. That development includes the extension of Dyer Lane, which would provide a new connection to Baseline Road that would divert traffic from Watt Avenue north of Dyer Lane.
- The 2005 traffic volume for Segment 98 represents the traffic count

Ms. Celia McAdam  
July 12, 2007  
Page 2

We look forward to reviewing future studies for this project. If you have any questions, please feel free to contact me at 875-2844.

Sincerely,



Jaskamal Singh  
Associate Transportation Engineer  
Department of Transportation

cc: Matthew Darrow, DOT  
Dan Shoeman, DOT  
Dean Blank, DOT  
Steve Hong, IFS

taken south of Elkhorn Boulevard, not north of Elkhorn Boulevard and the revised daily traffic volumes for Revised Table 4.8-8 reflect that location.

The corrected traffic volumes in Revised Table 4.8-8 also require revised volume, volume/capacity ratios and level of service estimates in Revised Tables 4.8-9, 4.8-11, 4.8-12, which are also provided at the end of responses to Comment Letter I-002, and in Chapter 4. The revised analysis does not indicate any traffic impacts on these roadway segments.

#### **L-001-004**

As noted on page 4.8-18 of the Draft Tier 1 EIS/EIR, the roadway improvements in the 2020 analysis outside of Placer County and South Sutter County are consistent with the Sacramento Area Council of Governments (SACOG)'s approved Metropolitan Transportation Plan (MTP), and thus assumed two lanes on 16th Street south of the Placer County line. Use of the MTP roadway improvements in the analysis is consistent with the use of SACOG's development assumptions for Sacramento County. As shown in Revised Table 4.8-9, the build alternatives would reduce traffic volumes on Segment 109 in 2020. If four lanes were assumed for Segment 109 in the analysis, the 2020 levels of service would be better than those shown in the Draft Tier 1 EIS/EIR and the proposed project would still not cause a traffic impact on that roadway segment.

As discussed on page 4.8-18 of the Draft Tier 1 EIS/EIR, the 2020 analysis assumed Phase 1 of the Placer Vineyards project, and thus assumed a four-lane 16th Street between Base Line Road and the Sacramento County line (Segment 108).

**L-001-005**

As noted on page 4.8-18 of the Draft Tier 1 EIS/EIR, the roadway improvements in the 2040 analysis outside of Placer County and South Sutter County are consistent with SACOG's approved MTP and thus assumed two lanes on 16th Street south of the Placer County line. As shown in Table 4.8-26, the build alternatives would reduce traffic volumes on Segment 109 in 2040. If four lanes were assumed for Segment 109 in the analysis, the 2040 levels of service would be better than those shown in the Draft Tier 1 EIS/EIR and proposed project would still not cause a traffic impact on that roadway segment.

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## Response to Comment L-001-001

**Revised Table 4.8-2  
Level of Service Definitions – Daily Segment-Based Analysis**

Roadway Capacity Class	Maximum Daily Traffic Volume Per Lane for Each Level of Service Designation				
	A	B	C	D	E
1) Arterial – High Access Control	6,000	7,000	8,000	9,000	10,000
2) Arterial – Moderate Access Control	5,400	6,300	7,200	8,100	9,000
3) Arterial and Collector – Low Access Control	4,500	5,250	6,000	<del>6,750</del> 6,750	7,500
4) Expressway – Level Terrain	4,050	6,620	9,450	12,150	13,500
5) Freeway – Level Terrain	6,300	10,620	13,680	16,740	18,000
6) Rural Roadway	1,500	2,950	4,800	7,750	12,500

Sources: Placer County General Plan EIR and Sacramento County General Plan EIR

**MEMORANDUM**  
**PLACER COUNTY HEALTH AND HUMAN SERVICES**  
**Environmental Health Services**

**TO:** Maywan Krach, Environmental Coordination  
Ann Baker, Planning Department

**FROM:** Dana Wyrniger, R.E.H.S.  
Land Use and Water Resources Section

**DATE:** August 16, 2007

**SUBJECT:** Placer Parkway Corridor Preservation, Draft Tier 1 EIS/Program EIR

RECEIVED

AUG 17 2007

P.C.T.P.A.

Environmental Health Services has reviewed the subject EIS/EIR, received by us on July 11, 2007. (This did not include a review of the supporting technical studies, or a project site visit.) We offer the following comments:

L-002-001

1. Chapter 4.10 Noise- this chapter appears to use Federal noise standards, including a 66dBA-Leq (hourly) criterion. The Placer County Noise Element utilizes a Ldn/CNEL standard for transportation noise sources. As there is no routine method of converting an hourly Leq level to an Ldn level, it would be helpful if the Tier 2 EIS/EIR noise discussions would additionally utilize the Ldn/CNEL standard.

L-002-002

2. Section 4.10.4.4- in the Tier 2 EIS/EIR please define the situations where PCPTA would consider the use of noise barriers to abate noise impacts on sensitive receptors. (For instance, would this be for sensitive receptors in place before start of Placer Parkway construction?)

L-002-003

3. The June 29, 2007 Draft Initial Site Assessment should be revised to include the 1937-38 USDA-precursor aerial photos available at County Museums and elsewhere. Likewise, the project site assessment should generally comply with the other requirements of ASTM E1527-05. We would recommend a revised site assessment, which should include a review of local records, as part of the Tier 2 EIS/EIR.

L-002-004

4. Page 4.15-2 Orphan Facilities- this section erroneously combines the "Western Placer Household Hazardous Waste Collection Facility" with the Western Regional Sanitary Landfill (WRSL); these are two separate facilities. Please also note that the hazardous waste facility is the WPPWMA Permanent Household Hazardous Waste (HHW) Facility. This HHW facility is co-located at the Materials Recycling Recovery Facility (MRF). The WRSL is a separate facility from the MRF. Please correct as necessary.

L-002-005

5. Page 4.15-2 Orphan Facilities- the facilities in this section are permitted with the Placer County Certified Unified Program Agency, but it does not appear our records were consulted for information. The discussion of the HHW facility states it has generated household hazardous waste, with no further information available. This is incorrect. The HHW facility is a Permit By Rule facility approved to receive and store hazardous waste from the public, some businesses, and the MRF for further onsite treatment or disposal. Please revise this discussion as necessary.

L-002-006

6. Page 4.15-6 Orphan Facilities- in preparing a revised site assessment for the Tier 2 EIS/EIR CUPA records should be consulted for the location of the Rio Bravo Power Plant underground diesel tank. Also, please note that this facility is a large quantity generator of hazardous waste and a California Accidental Release Prevention Program facility. It is also not clear that the Formica Corporation discussion is current.

L-002-007

7. Page 4.15-16 Tier 2 Mitigation Commitments- please add surveys to identify water wells and septic systems that would be impacted by the project, and include a provision for their proper destruction under local permits.

Please contact me if you have any questions.

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EIR.doc  
Page 1 of 1

08/17/2007 FRI 14:19 [JOB NO. 6133] 002

ENVIRONMENTAL COORDINATION SERVICES #5510 P.002/003

AUG 17 2007 14:39 530745303

**L-002-001**

As stated in Section 5.1 of the Placer Parkway Corridor Preservation Traffic Noise Analysis Technical Memorandum, which is incorporated by reference in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, the 60 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) noise compatibility threshold will be taken into consideration during the more detailed Tier 2 analysis. Also, Day-Night Noise Level ( $L_{dn}$ )/CNEL levels can be derived from Hourly Equivalent Noise Level ( $L_{eq}$ ) levels, given some assumptions regarding temporal distribution of traffic volumes. This is described further in Section N-2231 of the Caltrans Technical Noise Supplement. Given these methods, it can be determined that if peak hour traffic is equal to approximately 10 percent of average daily traffic (ADT) and the day/night split is approximately 85/15 (both reasonable assumptions), then the free-flowing peak hour  $L_{eq}$  will generally be similar to CNEL.

**L-002-002**

Abatement of potential noise impacts, including the implementation of specific mitigation measures such as noise barriers, will be evaluated further in the Tier 2 stage. As the commenter notes, the Draft Tier 1 EIS/EIR does describe potential noise abatement strategies that may be considered in Section 4.10.4.

**L-002-003**

The process of environmental review undertaken for the preparation of the Draft Tier 1 EIS/EIR is intended to identify potential direct impacts, such as noise or hazardous wastes, that could adversely affect communities in the study area. These potential impacts are described in the Draft Tier 1 EIS/EIR, along with general mitigation measures that could be employed to reduce or avoid such impacts. As this evaluation has been undertaken at the Tier 1 level, the analysis is focused on the identification of impacts at a broad and general level of detail. At the Tier 2 level of analysis, once a corridor alignment alternative has been



selected, more detailed analysis of impacts will be undertaken to focus on a narrower geographical area and identify specific impacts at a more local level. At that time, a more in-depth analysis of potential hazardous waste impacts will be undertaken. This will include a revised site assessment that takes into account all relevant historical air photos, and reviews local agency records regarding possible impacts due to the presence of hazardous materials/wastes.

**L-002-004**

This comment is noted. It is recognized that the Western Regional Sanitary Landfill (WRSL) and the Materials Recycling Facility (MRF) are two separate permitted facilities. To clarify the discussion of the Household Hazardous Waste Collection Facility (HHWCF) and WRSL in Section 4.15.2.2, the second paragraph on page 4.15-2, is revised as follows, so that the two facilities are clearly identified and described as separate facilities:

**Western Placer Household Hazardous Waste Collection Facility (HHWCF), Athens Road at Fiddymont, Lincoln, California.** This facility, also referred to as the Western Placer Waste Management Authority (WPWMA) Permanent Household Hazardous Waste (HHW) Collection Facility, ~~is commonly known as the Materials Recycling Facility, is located in the Western Segment of the study area, co-located with the Materials Recovery Facility, and is located in the Western Segment of the study area, adjacent to the Western Regional Sanitary Landfill (WRSL) (Figure 4.15-1).~~ The HHWCF facility was listed in the state HazNet database as having generated nine shipments of household waste. ~~No further information is available. According to the California Integrated Waste management Board website, the WRSL is an active landfill that accepts ash, construction and demolition debris, mixed municipal waste, and sludge/biosolids. The facility was inspected by the local enforcement agency on February 23, 2006, and no violations or~~

~~areas of concern were noted.~~ The HHWCF facility is a Permit by Rule facility approved to receive and store hazardous waste from the public, some businesses, and the MRF for offsite treatment or disposal.

The last paragraph of page 4.15-2 is deleted.

On page 4.15-6, a new Section 4.15.2.7 is added to separately address the WRSL. Existing Sections 4.15.2.7 and 4.15.2.8 become 4.15.2.8 and 4.15.2.9, respectively.

#### **4.15.2.7 Integrated Waste Management Board**

A 280-acre active landfill, the WRSL, is located in the northwestern portion of the Eastern Segment southeast of the Fiddymont Road and Athens Avenue intersection (Figure 4.15-1). The land is owned and operated by the Western Placer Waste Management Authority (WPWMA), a joint powers organization consisting of Placer County and the cities of Lincoln, Roseville, and Rocklin.

According to the California Integrated Waste Management Board website, this landfill accepts ash, construction and demolition debris, mixed municipal waste, and sludge/biosolids. The facility was inspected by the local enforcement agency on February 23, 2006, and no violations or areas of concern were noted.

A groundwater monitoring well network was installed between 1995 and 2000 (with occasional replacement wells installed subsequently), and regular monitoring has been conducted at the WRSL since 1995. The network consists of 25 wells (6 for corrective action monitoring, 18 for detection monitoring, and 1 for water level monitoring only).

A monitoring well immediately west of one of the original unlined modules first showed evidence of groundwater degradation in the fourth quarter of 1995. Several volatile organic compounds (VOCs) were identified as having exceeded their respective tolerance limits, defined in WDR Order No. R5-2002-0218 as either:

- The background value established in the Monitoring and Reporting Program (MRP) for that constituent; or
- The constituent's background value, based on data for each reporting period collected only from the background monitoring points.

The presence of VOCs in the monitoring well was attributed to contamination via the migration of landfill gas (LFG).

A Corrective Action Program and addendum were submitted to the Central Valley Regional Water Quality Control Board (CVRWQCB) and were approved. The initial corrective actions identified were the installation of final cover and the extraction of LFG. Quarterly monitoring of groundwater quality in the six corrective action wells supplemented by trend analysis of results is used to evaluate the effectiveness of the actions.

At the present time, the WRSL is not considered to represent a potential REC to the project, given the lack of violations and regulatory sanctions. The possibility of the WRSL representing a potential REC will be evaluated further near the time of construction.

#### **L-002-005**

Section 4.15.2.2 of the Draft Tier 1 EIS/EIR is revised to reflect the correct classification of the Western Placer Household Hazardous Waste facility as a Permit by Rule Facility. A file review would be

conducted during the Tier 2 environmental review process. The following sentence is added to the end of the second paragraph in this section:

The HHW facility is a Permit by Rule facility approved to receive and store hazardous waste from the public, some businesses, and the MRF for offsite treatment or disposal.

**L-002-006**

As part of the preparation of a revised site assessment during the Tier 2 EIS/EIR process, the Certified Unified Program Agency records will be consulted in order to attempt to identify the location of the underground diesel tank on the Rio Bravo facility. The discussion of the Rio Bravo property will include all relevant environmental information with regard to hazardous materials. The Tier 2 EIS/EIR will refer to the status of the Formica Corporation facility as it exists at that time.

**L-002-007**

Surveys to identify water wells and septic systems that would be impacted by the project would be conducted during the Tier 2 environmental evaluation. This is not a mitigation measure; rather it is part of assessing project-specific impacts. The Tier 2 EIS/EIR would identify specific mitigation measures in such instances, as required by law, including proper destruction under local permits, where required.

**MEMORANDUM**  
**PLACER COUNTY HEALTH AND HUMAN SERVICES**  
**Environmental Health Services**

**RECEIVED**

**TO:** Maywan Krach, Environmental Coordination  
**FROM:** Deborah Kirschman, Hazardous Materials/Solid Waste Section  
**DATE:** August 2, 2007  
**SUBJECT:** Placer Parkway Corridor Preservation, Draft Tier 1 EIS/ Program EIR

AUG 17 2007

P.C.T.P.A.

Placer County Health and Human Services, Environmental Health Services, in the capacity of Local Enforcement Agency (LEA) for solid waste issues, has completed a preliminary review of the referenced documents and has the following comments relative to the proximity of the proposed parkway to the existing solid waste facilities [Western Regional Sanitary Landfill (including a closed landfill and operating landfill) and Western Placer Materials Recovery Facility (including a transfer processing station and a compostable materials handling operation)]:

L-003-001

L-003-002

L-003-003

- Landfills, both active and closed, produce methane gas and other gases. Methane gas readily migrates off site through the air or soil. The hazards associated with landfill gas include: asphyxiation, explosion and health impacts of exposure to trace gases. Methane is highly explosive in concentrations of 5-15%, and combustible in concentrations greater than 15%.
- The DEIS/EIR is relatively general regarding the existing solid waste facilities. A review of the geo-technical data available for the landfill/materials recovery facility should be considered. It should be noted that an exceedance of methane regulatory limits at the landfill boundary was discovered circa 2002 (LEA Notice & order to Cease & Desist No. 2001-01). Although section 20919.5 of Title 27, California Code of Regulations, requires landfill gas at the landfill boundary not exceed the Lower Explosive Limit (LEL) for methane (5% by volume), it should be understood that amounts of methane less than 5% by volume at the landfill boundary are not addressed by solid waste regulation.
- Activities such as construction, grading, trenching, and utility line installation in the vicinity of a sanitary landfill must address the hazards of landfill gas migration.

It is my understanding that land use staff will address non-solid waste concerns on behalf of Environmental Health Services under separate cover.

Thank you for the opportunity to review and comment on the referenced document. Should you have any questions please contact this office.

c: Jon Whitehill, CIWMB  
John Moody, CVRWQCB  
Dana Wyrniger, Land Development and Water Resources Section

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Page 1 of 1

08/17/2007 FRI 14:19 [JOB NO. 6133] 003

ENVIRONMENTAL COORDINATION SERVICES #5510 P.003/003

AUG 17 2007 14:40 530745303

**L-003-001**

All of the proposed Placer Parkway alternatives would have a portion of the Parkway located adjacent to the Western Regional Sanitary Landfill (WRSLEA) and the planned future expansion area of the WRSLEA. As the commenter indicates, landfill gas (LFG) containing methane is generated at the WRSLEA as the organic portion of the buried refuse decomposes. LFG can create health and safety concerns if it is allowed to migrate laterally from the landfill's waste mass beyond the landfill boundary. For example, in the presence of oxygen, methane found in concentrations at or above the lower explosive limit for methane (5 percent by volume) constitutes an explosion hazard.

The WRSLEA is addressed in Section 4.15.2.2 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. Potential impacts related to the proximity of the WRSLEA will be addressed in more detail as part of the Tier 2 EIS/EIR document. This will include a discussion of methane gas migration and its explosive characteristics as it relates to the design and construction of the Placer Parkway. Please also see response to Comment L-003-002.

**L-003-002**

The WRSLEA has installed a number of environmental control systems that limit the quantity of LFG that is released both into the atmosphere and into the subsurface soils surrounding the landfill's waste mass. Landfill surface air emissions and subsurface soil gas concentrations in the soils surrounding the landfill are monitored as part of ongoing periodic monitoring programs, reviewed by the California Integrated Water Management Board's Local Enforcement Agency (LEA), Placer County's Environmental Health Services Division.

The first environmental control system to prevent the subsurface lateral migration of LFG from the landfill's waste mass is the liner system underlying the WRSLEA. LFG migration through subsurface soils is more

likely if the landfill is not lined with a Subtitle D composite liner system. The WRSL contains 14 “modules” or subsections. The only portions of the WRSL that do not have a Subtitle D composite liner are under the five northeasternmost subsections referred to as Modules 1, 2, 10, 11, and 12; located approximately 3,600 feet north of the Placer Parkway corridor. These modules are located on clay materials with very low permeability that would limit both leachate and LFG flow through them. However, these areas are the most susceptible to LFG migration, since they do not have the lining systems that the remainder of the landfill has or will have prior to use.

The likelihood of LFG migrating from these northern modules toward the southern property boundary of the WRSL is relatively low. LFG monitoring probes on the landfill’s southern property boundary have been and would continue to be used to determine whether LFG migration occurs toward the Placer Parkway corridor.

If LFG is found to be migrating, the LFG collection system is the landfill’s second environmental control system to regulate LFG subsurface migration beyond the landfill’s boundary. Currently, the LFG collection system consists of at least 50 vertical wells and 2 horizontal extraction collectors in the interior of the WRSL, and 73 perimeter extraction wells. LFG from these collection points is transmitted through a series of solid header pipes to the flare station where the gasses are burned in controlled flare(s). The LFG collection system is designed so that it can be adjusted as required to meet regulatory requirements.

The data gathered as part of the quarterly monitoring of surface gas emissions and perimeter LFG probes are used to determine whether the existing LFG collection systems are adequately collecting the LFG being generated, and to help the operator meet the landfill’s permit requirements. If LFGs are not being adequately collected, the WRSL is obligated by its air and solid waste facility operations permits to bring the

site into compliance by, among other options, operationally adjusting or, if necessary, expanding its LFG collection system.

As indicated by the commenter, the WRSL was issued a notice of violation for an exceedance of methane in 2002. Quarterly monitoring reports for 2004 and 2005 indicate that the LFG system operations are in compliance with the regulatory requirements. Results from both the surface gas emission monitoring and the perimeter LFG probe monitoring programs indicate that the regulatory minimum standards for surface gas emissions and lateral subsurface soil gas migration are currently being met by the landfill operations (SCS Field Services, 2004 and 2005).

The Tier 2 EIS/EIR for Placer Parkway will analyze this issue in more detail, as LFG generated within the deposited waste mass and not collected by the LFG collection system can potentially find its way into the subsurface soils beneath and adjacent to the landfill footprint and potentially migrate offsite, although this is not likely, as described above.

**L-003-003**

Potential hazards associated with migration of LFG on the Placer Parkway from the nearby WRSL will be discussed in more detail in the Draft Tier 2 EIS/EIR document. In that document, more detailed information will be available regarding project construction, grading, trenching, and utility line installation, and the document will therefore address specific measures related to conducting such activities in a manner that takes into account potential methane-related hazards.



PLACER COUNTY WATER AGENCY  
 BOARD OF DIRECTORS    BUSINESS CENTER  
 Gray Allen, District 1    144 Ferguson Road  
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 David Breninger, General Manager    800.464.0030  
 Ed Tiedemann, General Counsel    WWW.PCWA.NET

August 14, 2007  
 File No. WA/West Placer

Celia McAdam, Executive Director  
 Placer County Transportation Planning Agency  
 299 Nevada Street  
 Auburn, CA 95603

RECEIVED

AUG 15 2007

P.C.T.P.A.

SUBJECT: Placer Parkway Corridor Preservation Tier 1 EIS/EIR

Dear Ms. McAdam,

Thank you for the opportunity to review and comment on the EIS/EIR prepared for the Placer Parkway Corridor Preservation Project. Placer County Water Agency (PCWA) has reviewed the information and has the following comments.

L-004-001

PCWA would like to take this opportunity to convey the need for temporary construction and permanent utility easements for utility infrastructure within Placer Parkway, from the east side of Whitney Ranch Parkway crossing of SR 65, to future developments to the west. The proposed infrastructure is anticipated to be a 48-inch treated water pipeline necessary to serve future developments such as Placer Ranch, Regional University and Placer Vineyards.

L-004-002

The use of reclaimed water for irrigation purposes is an important component of PCWA's Integrated Water Resources Plan. The Agency fully supports and encourages the use of reclaimed water for irrigation purposes for this project.

PCWA appreciates the opportunity to comment. If you have any questions please call me at (530) 823-4886.

Sincerely,

Heather Trejo  
 Environmental Specialist

HT:ly

z:\engfiles\wa\placer parkway corr preservation eis- eir

WATER . ENERGY . STEWARDSHIP .

**L-004-001**

This comment is noted. When the Tier 2 environmental process is initiated, Placer County Transportation Planning Agency, or such other entity that may be acting as the California Environmental Quality Act lead agency or project sponsor, will continue coordination with local jurisdictions and agencies regarding the scope of environmental analysis.

The commenter is encouraged to provide input on the need for location of a water line within the Placer Parkway right-of-way early in the Tier 2 process, so that it can be considered in the project description for evaluation in the Tier 2 EIS/EIR.

**L-004-002**

When the Tier 2 process is initiated, consideration will be given to the use of reclaimed water for irrigation. The commenter is encouraged to restate this comment during the scoping process for the Tier 2 EIS/EIR.





PLACER COUNTY DEPARTMENT OF AGRICULTURE WEIGHTS AND MEASURES

11477 E Avenue, Auburn, CA 95603-2799 (530) 889-7372 FAX (530) 823-1698

CHRISTINE E. TURNER Agricultural Commissioner/ Sealer of Weights and Measures

RECEIVED SEP 10 2007 P.C.T.P.A.

September 7, 2007

TO: Celia McAdam, Executive Director, Placer County Transportation Planning Agency
FROM: Christine Turner, Placer County Agricultural Commissioner
SUBJECT: Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report

I have the following comments to make on the Draft Tier 1 Environmental Impact Statement/ Program Environmental Impact Report for the Placer Parkway Corridor Preservation Project dated June 29, 2007:

The five Alternative Routes for the proposed Placer Parkway all include significant impacts to Placer County's agricultural resource base. Under CEQA, potential significance of environmental impacts must be evaluated and an impact would be considered significant if the proposed project would:

- Convert Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance) as defined in the California Department of Conservation Farmland Mapping and Monitoring Program to non-agricultural use;
Create potential conflicts with County goals, policies, and standards that may lead to physical impacts on the environment;
Conflict with existing zoning for agricultural use or with a Williamson Act contract; or
Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland to non-agricultural use.

The proposed Placer Parkway does all four of these things.

L-005-001

L-005-001

Section 4.4 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR addresses the potential direct, indirect, and cumulative impacts with respect to Important Farmland and Williamson Act contracted land. Tables 4.4-10 and 4.4-11 on page 4.4-22 of the Draft Tier 1 EIS/EIR quantitatively show the potential direct and cumulative impacts to Important Farmland and Williamson Act contracted land, respectively, of all proposed build alternatives. Consistent with the comment, the Draft Tier 1 EIS/EIR states on page 4.4-18 that the proposed project may have "substantial" impacts on Important Farmland associated with the various alternatives, and that all build alternatives are considered to have an impact on Williamson Act contracted land within the study area. In Section 5.3.1, this impact is identified as a "significant and unavoidable impact" under the California Environmental Quality Act.

As this evaluation has been undertaken at the Tier 1 level, the analysis is focused on the identification of impacts at a broad and general level of detail. In the Tier 2 stage, once a corridor alignment has been selected, more detailed analysis of impacts will be undertaken to focus on a narrower geographical area and identify specific impacts at a more local level. The Draft Tier 1 EIS/EIR does provide some information on mitigation for farmland impacts. Specifically, the third bullet on page 4.4-23 under the Tier 2 Mitigation Considerations subheading, states the following: "Conversion of farmland to nonfarmland uses could be mitigated by preserving an equal amount of agricultural land within the respective counties in those areas that have not been approved or proposed for urban uses (i.e., primarily in the Central Segment). This would be consistent with Placer County's current policy of requiring one-to-one (1:1) replacement for agricultural land impacted by proposed projects where feasible. The no-development buffer zone as proposed would meet much of this mitigation goal. This mitigation strategy should be coordinated with the Placer and Sutter County Agricultural

L-005-001

Therefore the Farmlands Mitigation Considerations need to include, in substance, the following:

**In order to mitigate for farmland in Placer County being converted to non-agricultural uses on the project site and on areas designated for off-site improvements, the project shall mitigate for lost agricultural resources on a one-to-one (1:1) basis within Placer County. The mitigation lands acquired shall be, as determined by the Planning Director, in consultation with the County Agricultural Commissioner: (1) in agricultural production, or have the potential to support agriculture, and (2) are undeveloped and have a Natural Resources Conservation Service soils classification of the same or greater value than lands being affected within the Placer Parkway Corridor, or (3) are undeveloped and have the same or higher value California Department of Conservation categorization than lands being affected by the Placer Parkway Corridor within Placer County.**

Although implementation of this mitigation measure would permanently protect an amount of farmland equal to that converted to non-agricultural uses for the proposed project, it would not prevent the direct loss of farmland on the project site and on areas designated for off-site infrastructure. Purchase of conservation easements would preserve existing farmland, but would not create new farmland to replace that lost to project development. Because the proposed project would convert Important Farmland to non-agricultural uses, both the project impacts and the cumulative impacts need to be recognized, evaluated and mitigated.

cc Loren Clark, Assistant Planning Director, Placer County,  
Michael Johnson, Planning Director, Placer

Commissioners, particularly in areas where agricultural lands will have been converted to other uses prior to Placer Parkway Tier 2 environmental review, to ensure that a fair share mitigation strategy is promoted. This mitigation strategy would reduce impacts to farmlands.”

Please also see response to Comment B-003-002 regarding the updated 2004 Farmland Mapping and Mitigation Program Geographical Information Systems analysis.



RECLAMATION  
DISTRICT 1000

August 20, 2007

Celia McAdam, Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

Subject: Placer Parkway Corridor Preservation Project

Dear Ms. McAdam;

Reclamation District No. 1000 (District) operates and maintains the levee system surrounding the Natomas Basin which protects the area from exterior flooding. In addition, the District operates and maintains the primary canals and pump stations which collect the interior drainage within the Natomas Basin and pumps it to the exterior river system.

All of the proposed Placer Parkway Corridor Preservation Project alternatives cross through a portion of the District. In a number of locations the proposed project alignment conflicts with existing District facilities including the Natomas East Main Drain Canal (NEMDC), Pleasant Grove Creek Canal (PGCC), the levee system on each of these canals as well as several interior drainage canals. The project will require an encroachment permit from the District as well as the State Reclamation Board. As such, the project must analyze its impacts on the District's facilities and include mitigation measures to address any adverse impact.

Issues which will need to be addressed to the satisfaction of the District include but are not limited to:

1. Roadway drainage
2. Hydraulic analysis of proposed infrastructure for crossings at the existing canal and levee system.
3. Hydraulic impact of proposed project on existing interior floodplain and appropriate mitigation measures.
4. Analyze impacts of proposed project on existing interior drainage system including ability to transport drainage to exterior pump stations.

1633 GARDEN HIGHWAY  
SACRAMENTO, CA 95833  
916-922-1449

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P.C.T.P.A.

### L-006-001

Potential impacts on the levee and drainage systems in the Natomas Basin are evaluated in Section 4.11.3.3 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. Potential mitigation measures that could be used to avoid and/or minimize impacts on these systems are described in Section 4.11.4. During the Tier 2 environmental process, as described in Section 4.11.5, more specific analyses will be undertaken to evaluate hydrological impacts, including those identified by the Reclamation District. These would include preparation of a Drainage Report, Location Hydraulic Study, and Summary Floodplain Encroachment Report. During Tier 2 analyses, the project team would welcome the opportunity to work with the Reclamation District on resolving potential issues associated with impacts on District facilities.

L-006-001

L-006-001

5. Impacts on the District's operations and maintenance including providing continuous access at all crossings of canals and levees.

6. Right of way and/or easements necessary for project.

As details for the various project alternatives are more fully developed, we anticipate more detailed comments on the potential impacts to District facilities. We appreciate the opportunity to review the proposed project during its early stages to avoid potential conflicts later in the planning process. I am available to work with you and your staff to discuss our concerns in more detail. Once again, thank you for the opportunity to work with the Placer County Transportation Planning Agency on this important regional transportation project.

Sincerely,



Paul Devereux  
General Manager/District Engineer

cc. Stein Buer (SAFCA)  
Brian Walker (Mead and Hunt)

Municipal Services Agency  
Planning and Community Development  
Robert Sherry, Director



County of Sacramento

Terry Schutten, County Executive  
Paul Hahn, Agency Administrator

**L-007-001**  
This comment is noted.

August 14, 2007

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AUG 27 2007

P.C.T.P.A.

Attention: Ms. Celia McAdam  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

**RE: DRAFT PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/PEIR**

Ms. McAdam,

**L-007-001**

Thank you for the opportunity to review the Draft Placer Parkway Corridor Preservation Tier 1 Environmental Impact Report/Program Environmental Impact Report. The staff of the Sacramento County Planning & Community Development Department has reviewed the document and do not have any comments at this time.

We look forward to the opportunity to review future documents related to this project. If you have any general questions or comments, please contact Tim Tadlock or Surinder Singh at 916-874-6141.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Sherry", with a long horizontal line extending to the right.

Robert Sherry  
Planning Director

cc: Tim Tadlock  
Surinder Singh  
Leighann Moffitt



SUTTER COUNTY  
COMMUNITY SERVICES DEPARTMENT

Planning – Lisa Wilson, Planning Division Chief  
Animal Control  
Building Inspection  
Environmental Health

Director – Larry Bagley  
Assistant Director – Randy Cagle  
Fire Services – Dan Yager  
Emergency Services – John DeBeaux

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AUG 23 2007

P.C.T.P.A.

August 21, 2007

PCTPA  
Celia McAdam, Executive Director  
299 Nevada Street  
Auburn, CA 95603

**Re: Comments on the Draft Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement / Program Environmental Impact Report (Draft Tier 1 EIS/EIR)**

L-008-001

The Draft Tier 1 EIS/EIR concludes that Alternative 4 is the environmentally superior alternative. Sutter County would like to provide its continued support for either of the northerly corridor alignments (Alternatives 4 and 5) both of which terminate at Sankey Road and State Route 99/70 with an interchange.

L-008-002

A full interchange has been proposed for the current at-grade intersection of Riego Road and SR99/70. This interchange project has been approved by the California Transportation Commission, Caltrans, SACOG and Sutter County and is funded through multiple sources. Construction is slated to begin May 2011. Alternatives 1-3 terminate in an alignment north of Riego Road and will conflict with this currently programmed project.

If you have any questions regarding this matter feel free to contact me at (530) 822-7400.

Sincerely,

Lisa Wilson  
Planning Division Chief

LW:kf

P:\Planning\General Correspondence Letters\Lisa Wilson\Placer Pkwy DEIS-DEIR comments.doc

1130 Civic Center Boulevard • Yuba City, CA 95993 • (530) 822-7400 • FAX: (530) 822-7109

**L-008-001**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**L-008-002**

Please see response to Comment B-005-002.



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CITY OF SACRAMENTO  
CALIFORNIA

DEVELOPMENT SERVICES DEPARTMENT

ENVIRONMENTAL CLEARINGHOUSE COMMITTEE

2101 ARENA BOULEVARD  
SUITE 200  
SACRAMENTO, CA  
95834

ENVIRONMENTAL PLANNING SERVICES  
916-808-8458  
FAX 916-566-3968

August 14, 2007

Celia McAdam  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

SUBJECT: Draft (Tier 1) Environmental Impact Statement / Program Environmental Impact Report for the Placer Parkway project

Dear Ms. McAdam,

L-009-001

Thank you for the opportunity to comment on the draft EIR / EIS for the Placer Parkway project. At this time the City does not have any comments, but we would like to remain on the list for all noticing of this project in the future. Thank you.

Sincerely,

John Law  
Environmental Planning Services

cc: ECC 07-008

L-009-001

This comment is noted.



COUNTY OF PLACER  
Community Development Resource Agency

John Marin, Agency Director

PLANNING

Michael J. Johnson, AICP  
Director of Planning

SENT VIA ELECTRONIC MAIL -- ORIGINAL SENT VIA UNITED STATES POSTAL SERVICE

September 24, 2007

Celia McAdam  
Executive Director  
Placer County Transportation and Planning Agency  
299 Nevada Street  
Auburn, CA 95603

SUBJECT: **Placer County Comments on the Placer Parkway Corridor Preservation  
Tier 1 Draft EIS/Program EIR**

Dear Mrs. McAdam:

On behalf of Placer County, I would like to thank you for providing the County the opportunity to comment on the Placer Parkway Corridor Preservation Tier 1 Draft EIS/Program EIR. As stated in the 'Purpose and Need' section of the document, Placer County concurs that the proposed roadway is needed to reduce pressure on the existing transportation network while at the same time addressing future congestion on local roadways in south Sutter County and southwestern Placer County. To this end, Placer County is committed to assisting your Agency in getting this roadway project under construction as quickly as possible.

All County departments have reviewed the draft document, and this letter includes all County responses. The County's comments on the Draft EIS/Program EIR include the following:

**Intent/Purpose of the Placer Parkway Buffer is Inaccurate**

L-010-001

The 500-foot to 1,000-foot buffer for the Parkway as described in the Tier 1 Draft EIS/Program EIR appears to be inconsistent with Placer County's understanding of what the purpose the buffer was actually intended to serve. It is the County's understanding that, during the Tier 2 process, there would be performance measures defined for the buffer, and that these performance measures could be met in a variety of ways. One alternative would be to set aside a land buffer outside of the roadway alignment, but there may be other alternatives to accomplish the same goals.

**L-010-001**

The size of the no-development buffer in the context of changing land uses is addressed by the provision for adjustments in the buffer during the Tier 2 stage of the Parkway environmental process, as described in the last paragraph on page 2-9 of Section 2.2.4.1: "Since the value of the no-development buffer zones to maintain the parkway concept and limit access depends to some extent on the adjacent land uses, 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."

Please also see Master Response 1 and response to Comment B-006-002 regarding adjustments to the no-development buffer in the context of future land use needs, and Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR, which identifies provisions regarding the buffer easement in a portion of the corridor identified as the Least Environmentally Damaging Practicable Alternative.



**L-010-001** | There are various sections in the document that state the buffer is to preclude future connections to Placer Parkway, as well as exclude possible future land uses. Placer County believes these statements are not accurate, and that it is premature to define the buffers in such a hard and fast manner in this document, especially when the performance measures needed to establish the parameters have not yet been defined. Placer County requests that all references in the draft document regarding the use of the buffer to preclude future connections and/or land uses be eliminated and/or modified to reflect that the issue will be addressed in the Tier 2 document.

**Identification of Alternative 4 as the Environmentally Superior Alternative is Faulty**  
In reviewing the draft document, the County has noted some erroneous information within the document which shows that Alternative 4 may not be the Environmentally Superior Alternative. Specifically:

**L-010-002** | 

- In reviewing Figure 4.4-1 (Important Farmland) of the draft document, and comparing that figure with the 2004 Farmland Mapping and Mitigation Program data prepared by the State Department of Conservation, the County notes that the two maps are not the same, yet the draft document states that the Department of Conservation was used as the basis for Figure 4.4-1. This discrepancy needs to be corrected, and the most accurate map needs to be included in the draft document to reflect actual conditions on the ground.

**L-010-003** | 

- In reviewing the Department of Conservation's Farmland Mapping and Mitigation Program data, the County has concluded that, from a farmland impact perspective, Alternative 5, and not Alternative 4, has fewer impacts to prime/unique farmland. The draft document should be amended to reflect the actual farmland impacts that result from each respective alternative, based upon the Department of Conservation's known information. If, by chance, the Department of Conservation's information included on its website is incorrect and/or inaccurate based upon other/more recent data gathering, then that information should be made known.

**L-010-004** | 

- In reviewing the evaluation criteria for farmland impacts, and based upon the information included in Table 4.4-8 of the draft document, the County believes that the information presented is inconsistent with the known information provided by the State Department of Conservation. As shown in Table 4.4-8, neither Alternatives 4 or 5 impact farmland of local significance. However, as shown in the Department of Conservation's Farmland Mapping and Mitigation Program data, each alignment impacts farmland of local significance. In performing a cursory analysis, the County has concluded that the Alternative 4 alignment actually impacts more farmland of local significance than does the Alternative 5 alignment. After factoring in the impacts to farmlands of local significance, it is the County's determination that the total farmland impacts (i.e., impacts to unique/prime farmlands and farmlands of local significance) are less with Alternative 5 than with Alternative 4.

#### **L-010-002**

Please see response to Comment B-003-002, and the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD), circulated for public comment on January 30, 2009, which does amend the farmland impacts based on new data.

#### **L-010-003**

As discussed in response to Comment B-003-002, the updated 2004 farmland data have been included in the PRD to reflect the changes to the Department of Conservation Geographical Information System database. Table 4.4-8 was revised in the PRD, which concludes that, from a farmland perspective, Alternative 5 has fewer impacts to prime/unique farmland than Alternative 4.

#### **L-010-004**

The commenter is correct and these changes were reflected in the PRD. Please also see responses to Comments L-010-002 and L-010-003.

- L-010-005**
- While the draft document identifies Alternative 4 as the Environmentally Superior Alternative, the County believes there are positive aspects of Alternative 5 that should also be considered, such as the location of the Watt Avenue interchange. Alternative 5 allows for better spacing between the future Watt Avenue/Blue Oaks Boulevard intersection and the Parkway interchange, thereby providing improved roadway and interchange geometry, and a superior overall roadway network. The County respectfully requests that the final environmental analysis prepared for this project take into consideration the beneficial aspects associated with Alternative 5 and the future interchange of Watt Avenue and Placer Parkway.

**Conclusion**

Given the breadth of issues discussed in the draft document, it is obvious that the Placer County Transportation and Planning Agency has dedicated a lot of time and resources towards the circulation of this document, and the Agency is to be commended for this effort. As with any document, the potential exists for incorrect information to be inadvertently included in the document, and it is the County's hope that these constructive comments will help facilitate the preparation of a final Tier 1 environmental document that is based on the most current information available and that the document is factually accurate.

- L-010-006**
- As noted above, the County believes that there are positive aspects to Alternative 5 that should be considered when determining the Environmentally Superior Alternative. Based upon its analysis as presented above, the County has concluded there is merit to reevaluating Alternative 5 as the Environmentally Superior Alternative, and the County encourages the Agency to relook at its recommendation included in the draft document.

Again, thank you for your time and consideration in accepting Placer County's comments on the Placer Parkway Corridor Preservation Tier 1 Draft EIS/Program EIR. Should you need any additional information or clarification of the County's comments, please do not hesitate to call me directly.

Sincerely,

MICHAEL J. JOHNSON, AICP  
Director of Planning  
Placer County

cc: Tom Miller, County Executive Officer  
Anthony LaBoull, County Counsel  
Holly Heinzen, Assistant County Executive Officer  
Rick Dondro, Assistant Director of Public Works  
John Marin, CDRA Director  
Scott Finley, Supervising County Counsel  
Ken Grehm, Director of Public Works  
Board of Supervisors (All Districts)

**L-010-005**

Information regarding a potential future interchange with a potential future extension of Watt Avenue is contained in Chapter 7 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. This interchange is not proposed by the project and has not been proposed by another entity, and therefore is not considered in the determination of the Environmentally Superior Alternative under CEQA.

**L-010-006**

Please see PRD Sections 2.6.4 and 3.6.5, which make the same conclusions as the commenter with respect to the Environmentally Superior Alternative under CEQA.



# City of Rocklin

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F | 916.625.5095  
www.rocklin.ca.us

September 25, 2007

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SEP 26 2007

P.C.T.P.A.

Celia Mc Adam, Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603  
E-mail: pctpa@pctpa.org

RE: Placer Parkway Draft Tier 1 Environmental Impact  
Statement/Environmental Impact Report

Dear Celia:

Thank you for the opportunity to review the above-referenced document. The primary concern for the City of Rocklin regarding this project is in the area of transportation/circulation, specifically how the Placer Parkway might affect City of Rocklin intersections and street segments. In reviewing the Traffic and Transportation chapter, we have identified the following comments:

L-011-001

1. In Tables 4.8-8, 4.8-9, 4.8-11 and 4.8-12, Segment 83 (Sunset Boulevard east of Blue Oaks Boulevard) is shown to have 6 lanes in the year 2005, but then only 2 lanes in the year 2020. The facility should have 6 lanes assumed for the year 2020.

L-011-002

2. In Tables 4.8-8, 4.8-9, 4.8-11 and 4.8-12, Segment 89 (Valley View Parkway west of Park Drive) has a segment direction that does not make sense (Valley View Parkway does not go west of Park Drive), and in the year 2020, the segment is assumed to have 4 lanes, when the segment should be assumed to have 2 lanes.

L-011-003

3. In Tables 4.8-25, 4.8-26, 4.8-28 and 4.8-29, Segment 89 (Valley View Parkway west of Park Drive) has a segment direction that does not make sense (Valley View Parkway does not go west of Park Drive), but the segment is correctly assumed to have 2 lanes in the year 2040.

L-011-004

4. On pages 4.8-124 and 125, there is a discussion about Valley View Parkway that identifies three strategies to mitigate impacts to Valley View Parkway, one of which is to widen Valley View Parkway to four lanes. The accompanying discussion notes that construction of adequate turn lanes at the intersections of Valley View Parkway/Sierra College Boulevard and Valley View Parkway/Park Drive may provide LOS C conditions without the need for a widening Valley View Parkway to four lanes. The City encourages the PCTPA to continue to

Information 916.625.5000

Administrative Services 916.625.5000 • City Hall 916.625.5560 • Community Development 916.625.5100  
Community Services & Facilities 916.625.5200 • Fire 916.625.5300 • Police 916.625.5400 • Public Works 916.625.5500

## L-011-001

The commenter is correct in identifying that Sunset Boulevard east of Blue Oaks Boulevard should be assumed to have six lanes for the year 2020. Revised Tables 4.8-8, 4.8-9, 4.8-11, and 4.8-12 are included at the end of the responses to Comment Letter I-002, and in Chapter 4 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR. The correct number of lanes was used in the traffic analysis and the analysis results are unaffected.

## L-011-002

Please see response to Comment I-002-001.

## L-011-003

As described in response to Comment L-011-002, Segment 89 was mislabeled and should say "Park Drive west of Valley View Parkway," which is a four-lane roadway. Roadway Segment 111 is added to the analysis as "Valley View Parkway east of Park Drive." Revised Tables 4.8-25, 4.8-26, 4.8-28, and 4.8-29 are included at the end of the responses to Comment Letter I-002, and in Chapter 4 to re-label Segment 89 and to include volume, volume/capacity, and level of service (LOS) information for Segment 111.

The analysis shows a substantial ("significant" under CEQA) impact on the LOS of Valley View Parkway (Segment 111) under 2040 conditions. This impact was identified in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR (please see page 4.8-110).

## L-011-004

In the Draft Tier 1 EIS/EIR, the discussion on pages 4.8-124 and 4.8-125 recognizes that the City of Rocklin intends to have two lanes on Valley View Parkway through the Clover Valley area. The City of Rocklin's position regarding widening Valley View Parkway is acknowledged. The

Celia Mc Adam, Executive Director  
September 25, 2007  
Page 2

L-011-004

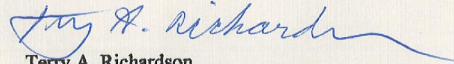
explore the mitigation options other than widening Valley View Parkway to four lanes, as the construction of a two lane facility would be major lessening of environmental impacts than that of a four lane facility. In addition, the 2-lane roadway would be consistent with the recent Rocklin City Council approval of the Clover Valley Development project that included a General Plan Amendment to the Circulation Element to designate the Valley View Parkway as 2-lane roadway.

L-011-005

5. The construction of the Highway 65 Interchange at Whitney Ranch Parkway, to accommodate Placer Parkway, needs to take place with the existing Caltrans right-of-way (ROW). This is particularly important on the east (Rocklin) side of the interchange where land uses have been designated on the Rocklin General Plan around the existing ROW and development plans are currently being processed.

If there are any questions, please do not hesitate to contact David Mohlenbrok, Senior Planner, at (916) 625-5160.

Sincerely,



Terry A. Richardson  
Community Development Director

cc: Carlos Urrutia, City Manager  
Larry Wing, City Engineer  
David Mohlenbrok, Senior Planner

TAR/cj

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Draft Tier 1 EIS/EIR is revised to add the following sentence to Page 4.8-124, in the second paragraph under Valley View Parkway:

The City of Rocklin does not view this mitigation strategy as an option for impacts on Valley View Parkway.

It also indicates the following: "... the intersections along Valley View Parkway/Sierra College Boulevard would have relatively low traffic volumes on its cross streets. Due to those conditions, the daily capacity of this segment may be greater than those used for this analysis. Construction of adequate turn lanes at the intersections of Valley View Parkway/Sierra College Boulevard and Valley View Parkway/Park Drive may provide LOS C conditions without the need for a widening of this segment to four lanes."

Placer County Transportation Planning Agency is continuing to coordinate with the City of Rocklin on this issue.

As further clarification, the following sentence is added to the end of the first full paragraph on page 4.8-125:

The details of such intersection improvements and the resulting levels of service would be determined in a subsequent Tier 2 EIS/EIR.

**L-011-005**

PCTPA and its consultants have provided input to the City of Rocklin regarding the required right-of-way allowances for the Placer Parkway/State Route (SR) 65 interchange east of SR 65 on several occasions. Conceptual drawings have been provided to the City of Rocklin, and these drawings show that, in the ultimate configuration, some area outside of the Caltrans right-of-way would be required for the fly-over. Such additional right-of-way would be obtained through the

Placer Parkway process. PCTPA is continuing to work with the City and its engineering consultant, and is participating on the Project Development Team for the SR 65 at Whitney Ranch Parkway project.



Community Development  
311 Vernon Street  
Roseville, California 95678-2649

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September 24, 2007, 2007

PCTPA  
Attn: Celia McAdam, Executive Director  
299 Nevada Street  
Auburn CA 95603

**Subject: City Comment on the Placer Parkway Corridor Preservation Tier 1 Draft EIS/Program EIR**

Dear Mrs. McAdam,

Thank you for the opportunity to comment on the draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation. As stated in the purpose and need for the proposed action, the ultimate purpose of the proposed Placer Parkway project is to "reduce anticipated congestion on both local and regional transportation systems and advance economic development goals in south Placer County and Sutter County". The construction of the Placer Parkway is a key component in Placer County's long term transportation strategy and is strongly supported by the City of Roseville.

Given the importance of Placer Parkway as a key regional facility, the City of Roseville is concerned with some aspects of the Tier I document. These concerns are outlined below, followed by specific comments.

1. The EIS/Program EIR Departs from the Intended purposes of the Tier I Document

As noted in the document, the purpose for the proposed action is to preserve right of way for a new or upgraded east-west connector between SR 70/99 and SR 65. Certification of the Tier 1 document, selection of a preferred alternative, and right of way acquisition are critical due to increased land use pressures within the study area. Although the selection and preservation of a corridor has limited environmental effects by itself, we understand the need for the document to address potential effects of construction and operation of the roadway. However, those discussions are purposely limited because only the general concepts of the roadway design and location are known at this time. As such, these areas would be more fully addressed through a Tier 2 process which would identify a specific roadway alignment within the adopted corridor.

The document, however, goes beyond this premise and imposes specific mitigation and policies at a Tier 1 stage that are more appropriately addressed as part of a future Tier 2 analysis. These additional mitigation measures and policies appear to affect the ability of the Placer Parkway to serve its intended purpose and may unnecessarily constrain local land use decisions before all of the information is available. As such, the City of Roseville requests that at a minimum the Final EIR provide clarifying language to ensure that all sections of the document are consistent with this intent. Two specific

916.774.5334 • Fax 916.774.5195 • TDD 916.774.5220 • www.roseville.ca.us

**L-012-001**

The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR is required by federal and state law to address mitigation. It does so at a level appropriate for a Tier 1 level of review, by identifying avoidance, minimization, and/or mitigation strategies for impacts of each resource area, at the end of each section of Chapter 4. Some "Mitigation Commitments" are identified that are appropriate at the Tier 1 level. Please see responses to Comments L-012-002 and L-012-003, below, which address more specific comments on this issue.

L-012-001

L-012-001

examples of where clarifying language should be provided are noted below along with other comments on the Draft EIR/EIS:

L-012-002

2. Analysis of the limited access design is inappropriate for a Tier 1 document

The proposed limited access design for the Parkway was intended to accomplish two distinct purposes:

- Preserve a high-speed facility by preventing unplanned interchanges from being constructed; and,
- Limit opportunities for growth inducement that might otherwise result from provision of access in areas not planned for growth.

Section 2.2.4 notes that the construction of additional interchanges along the central segment of the Placer Parkway *could* reduce free-flowing traffic conditions. To mitigate this potential impact, the document recommends the use of a no-development buffer zone to restrict future connections not considered in the Tier 1 document. The document, however, does not analyze a scenario that considers the effect of additional interchanges on the Parkway to justify such a requirement.

L-012-003

Section 2.2.4 further states that as local development proximate to the Parkway is approved and constructed there may be increasing pressure to add additional connections to the Parkway. Since portions of Placer County south of the Parkway have been identified in SACOG's preferred Blueprint alternative as potential growth areas, such a restriction absent an evaluation of the potential impacts is inappropriate within the Tier 1 document.

L-012-004

3. The intended uses of the 500 - 1,000 foot corridor have been inappropriately expanded

The purpose for the Tier 1 document is to preserve a 500 to 1000-foot corridor to accommodate the future right-of-way needed for the Placer Parkway. Section 2.2.4 of the document states that this corridor would be utilized as a "no-development buffer zone" with an acknowledgement that it may be appropriate to adjust the size and shape of this area dependent on adjacent land use. This is consistent with what was discussed between the stakeholders and member jurisdictions as part of the Technical Advisory Committee (TAC) process, when the project was being developed.

However, there never was discussion of a "no-development buffer zone" that would prohibit development or land uses. The no-development buffer zone appears to include open space and agricultural uses, biological mitigation, air quality mitigation and many of the numerous uses described throughout the document. (referenced on page 4-1-23, 4.1-28, and 4.6-35 (Visual/Aesthetics), 4.8-121(Traffic), 4.9-36-37 (Air Quality), 4.10-39 (Noise), 4.11-29 (Hydrology and Floodplains), 4.12-20 (Water Quality), 4.14-34 (Biology Resources))

Section 2.2.4 states that the no-development buffer zone is an area where development is either not permitted or is severely restricted. Additionally, section 4.9.4.3 states that the proposed Placer Parkway includes a 500 to 1000-foot no-development buffer area to restrict development from encroaching within 500 feet of the roadway edge. Such a restriction is not appropriate within the Tier 1 analysis and is more appropriately deferred until completion of a Tier 2 document and evaluation of land use conditions that may exist at the time of construction.

## L-012-002

The revised goals and policies of Placer Parkway approved by the Advisory Committees in 2004 include a Potential Implementation Method that states: "Restrict access in the 7-mile segment between Fiddyment Road and Pleasant Grove Road to one potential connection to a future extension of Watt Avenue or another nearby roadway extension."

The description of the Parkway has consistently included this "no-access" provision, even prior to the initiation of the Tier 1 EIS/EIR process; the Placer Parkway Project Study Report (PSR) (DKS, 2001) identified this concept in the original Parkway goals and policies, developed with extensive public outreach in a process that included the City of Roseville. In all of the Parkway outreach efforts, including written materials, and as presented in the Advisory Committee Meetings of which the City of Roseville was a member, this concept has been constant. This description was included in the Parkway's eleven Technical Reports, all of which were provided to the City of Roseville for review and comment.

In response to this comment and other comments regarding the no-development buffer, which restricts access, additional analysis was conducted to consider how the comparison of alternatives would be affected by allowing additional interchanges and development in the buffer area. These studies are discussed in Master Response 1, and included in Appendix G in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR, circulated for public comment on January 30, 2009. This analysis shows that, even with hypothetical additional interchanges, traffic on Placer Parkway would remain free-flowing. The analysis also shows that additional interchanges could result in additional growth in the vicinity of those interchanges. The result speaks to the commenter's acknowledgment that one of the purposes of the Placer Parkway was to limit opportunities for growth inducement that might otherwise result from provision of access in areas

L-012-005

4. Prescribing specific design criteria is inappropriate for a Tier 1 document

Several locations within the document go beyond the purpose of the Tier 1 document to preserve a roadway corridor by prescribing specific design criteria to the roadway which is more appropriately evaluated within a Tier 2 document. Two such areas are noted below:

- Section 2.2.2 identifies a specific bridge design requiring two 1600-foot-long multi-span bridges supported by abutments located approximately 800 feet on either side of the creek.
- Section 2.2.5 identifies specific landscaping requirements within the buffer areas. This section also identifies a requirement to landscape all portions of the 500 - 1000 corridor area not used as part of the roadway cross section. This requirement is inconsistent with Section 2.2.4 which states that his buffer area may be adjusted based on adjacent land uses and inappropriately constrains local land use decisions in advance of an environmental evaluation of the impacts.

5. The City of Roseville supports selection of Alternative Route 5

L-012-006

Alternative Route 5 provides better spacing between the future intersection of Watt and Blue Oaks and the Placer Parkway and best preserves opportunities for a potential future Watt Avenue or Blue Oaks Boulevard interchange and improved overall regional traffic circulation. As such the City of Roseville supports selection of Alternative 5.

The following provides specific comments on the document.

L-012-007

Page 4.1-20: Please revise the second paragraph which describes the West Roseville Specific Plan, to mention that the western 267 acres are set aside as a vernal pool preservation area. Any proposed Placer Parkway corridors that may impact this resource should be described and analyzed. Further, this open space significantly defines the visual character of the WRSP area.

L-012-008

Page 1-34 and Page 4.1-21 Section 1: Introduction and Purpose and Need. Please update the project descriptions for the Sierra Vista and Creekview Specific Plan areas. The Sierra Vista Specific Plan area is 2,100 acres. The Creekview Specific Plan area is 720 acres. The Creekview project includes a sphere of influence amendment on the Reason Farms Pan Handle, which has been identified as a potential site for a university/job center.

L-012-009

Page 4.1-23 Brookfield. Please revise the following sentence to add areas underlined: "The proposal is currently undeveloped, and no development is proposed at the present time. However, this area was identified by the City's Growth Management Visioning Committee (GMVC) in 2005 as an area that should be studied for the next potential sphere of influence expansion area and the City of Roseville has identified this project site as a Future Study Area in June 2007."

L-012-010

The draft EIS/EIR describes Roseville's undeveloped Reason Farm Park and Environmental Preserve as "City of Roseville Retention Basin." The park and preserve area totals approximately 1,750 acres, of which, only approximately 520 acres are for storm water retention. The Parks & Recreation Department is currently refining the

not planned for growth.

Master Response 1 also explains recent revisions to these analyses presented as a result of updates to Geographical Information System data provided by Placer County.

**L-012-003**

Please see Master Response 1, which describes additional analysis that was undertaken following publication of the Draft Tier 1 EIS/EIR, which was undertaken in order to address U.S. Environmental Protection Agency concerns about project-induced growth and the potential independent construction by others of future additional interchanges with the Parkway.

In any case, the proposed project does not propose interchanges between Pleasant Grove Road and Fiddymont Road; this description has remained constant through the process of identifying alternatives and evaluating them. The Draft Tier 1 EIS/EIR does acknowledge the potential of a future interchange that may be proposed in the future by others at a future extension of Watt Avenue.

**L-012-004**

The purposes of the no-development buffer are discussed in Master Response 1.

**L-012-005**

Conceptual roadway design criteria have been included in the Draft Tier 1 EIS/EIR in order to provide reasonable assumptions for the purposes of analysis of environmental impacts. As stated in Section 2.2 of the Draft Tier 1 EIS/EIR, "these assumptions would be subject to further development and refinement, and specific decisions about design of the roadway would be made during the Tier 2 process."



**L-012-010** master plan for the recreational areas of the site. The Tier 2 document should address how the proposed project will maintain adequate access for regional park users, and should address the impacts of the parkway and buffer on planned park uses, and describe any related mitigation measures.

**L-012-011** Page 4.1-23 Methodology for Impact Evaluation 2<sup>nd</sup> paragraph: Please revise the sentence as follows: "Direct physical impacts to land in the cities of ~~Roseville~~ and Rocklin, and the County of Sacramento are not anticipated and were not evaluated, as none of the corridor alignment alternatives are located within ~~Roseville~~ or Sacramento County or Rocklin."

This sentence above is incorrect. All alignment alternatives traverse the city's Reason Farms Pan Handle and two of the southerly alignments are located directly adjacent to the West Roseville Specific Plan's vernal pool preserve. It is likely there could be direct and indirect impacts to the City of Roseville.

**L-012-012** Page 4.1-28 2<sup>nd</sup> paragraph. The document states "The no-development buffer zone would help preserve the rural character of at least a strip of the agriculturally designated areas within all three segments by preventing development from extending to the roadway's edge." Again, this seems to inappropriately extend the restrictions of the corridor, especially in areas that are already planning development.

**L-012-013** Page 4.1-3 Please revise the discussion of Roseville's General Plan to include applicable General Plan policies including:

- Growth Management- Growth Areas Policy 5.6. Any development proposal west of Roseville shall aid in regional traffic solutions and in right of way preservation.
- Growth Management-Growth Area Policy 5.8 Any development proposal west of Roseville shall consider development potential within the entire City/County Memorandum of Understanding Transition Area in the design and sizing of infrastructure improvements.

**L-012-014** Pg. 4.5-7 Public Service and Utilities: Planned or Proposed Facilities Description of the City of Roseville Reason Farms area should reference the southern "panhandle" portion, which has been identified as a potential future site for a university or job center, and is currently being processed by the City as a sphere of influence amendment.

**L-012-015** Page 4.6-34 Section 4.6: Visual/Aesthetics: A portion of the proposed alignment is within property that is owned by the City of Roseville. The City should be consulted regarding all visual mitigation strategies referenced in Section 4.6. which could impact development within this parcel.

**L-012-016** Page 4.6-35 Tier 2 Mitigation Commitments. It is unclear why commitments are being made to consult with a Caltrans District Landscape Architect or as defined by FHWA at this time. Not enough information is known regarding the Tier 2 project in order to make such commitments. Segments of Placer Parkway could be fully funded and built locally.

**L-012-017** Pages 4.8-121, and 4.9-36, and 4.11-29 third dash, Avoidance/Minimization Strategies: language again and again references that the no development buffer zone would preserve open space and agricultural uses adjacent to the parkway and limit future development in the buffer zone, including additional future interchanges which

### L-012-006

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

### L-012-007

The vernal pool preservation areas in the western portion of the West Roseville Specific Plan are clearly shown on Figure 4.14-2. Indirect impacts to adjacent vernal pools are acknowledged in Section 4.14.3.4. These impacts will be analyzed in more detail in the Tier 2 environmental document.

### L-012-008

The Draft Tier 1 EIS/EIR relied on the best available information at the time the analysis was performed, based on data approved by the project's Advisory Committees, of which the City of Roseville was a member.

The Draft Tier 1 EIS/EIR acknowledges the likelihood that conditions will change over time (please see Section 3.6.1, Evolving Existing Conditions, beginning on page 3-10). Since the commenter made this comment, changes have again occurred in the referenced proposed specific plans, and given current economic conditions, these plans could change again. No change to the Draft Tier 1 EIS/EIR is necessary.

### L-012-009

The Draft Tier 1 EIS/EIR is revised so that the text in the Final Tier 1 EIS/EIR reflects this comment, as described below.

Page 4.1-23, Section 4.1.2.2, second full paragraph, after the third sentence add the following:

L-012-017

would affect the long-term reliable travel time reductions provided by the parkway. As previously stated, it is premature to make assumptions regarding future interchanges without a detailed analysis that confirms that interchanges would reduce travel time.

L-012-018

Section 4.9-1 Air Quality: references the use of the Sacramento Air Quality Management District document, *Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways*. Although the document states that it is common practice for smaller air districts to utilize other district guidelines, it should be noted that the Placer Air District has not consistently applied this particular guidance to projects in Placer County. Because of the implications to proposed land uses adjacent to major roadways, confirmation from the District regarding the use of this guidance document should be cited.

L-012-019

Page 4.9-37 Section 4.9.4.3: Mitigation commitments are conflicting, and are not consistent with the SMAQMD recommended protocol, which does not necessarily require a health risk assessment for all projects that propose locating sensitive receptors within 500 feet of a major roadway. The protocol includes a range of criteria, in addition to distance from the roadway, to determine whether an HRA is suggested. Further, the SMAQMD protocol does not, and is not intended to identify acceptable risk standards, but rather to provide information to decision-making bodies.

L-012-020

The mitigation commitments include the conflicting statements that the project includes a 500- to 1,000-foot *no-development* buffer, but then concludes that development projects would likely be at least 500 feet from the roadway, and therefore health risk assessments may not be necessary. If the corridor meanders (less than 500 feet in some areas, greater in others) then this statement could be problematic.

L-012-021

Page 5.3 Section 5: CEQA Evaluation: City of Roseville General Plan policies should be included in the analyses of consistency with applicable general plan policies.

Thank you for consideration of our comments. The City respectfully requests the opportunity to meet with PCTPA staff to review proposed responses to comments and proposed revisions to the draft EIS/EIR in advance of release of the final environmental document. Should you have any questions concerning this letter, please don't hesitate to contact me.

Sincerely,

  
Mark Morse  
Environmental Coordinator

However, this area was identified by the City's Growth Management Visioning Committee as an area that should be studied for the next potential Sphere of Influence expansion area and the City of Roseville identified this project site as a Future Study Area in June 2007.

#### L-012-010

The Draft Tier 1 EIS/EIR relied on the EIR for the "City of Roseville Retention Basin Project" dated January 10, 2003. That document identified that the retention facility "would provide future opportunities for other uses such as enhancement of riparian, wetland and upland habitats and passive recreation (pedestrian and bicycle trails, etc.) that could be constructed by the City or others" (URS, 2003). The EIS/EIR preparers are unaware of any approved update to this area, while noting that the City of Roseville has been in the early planning phases of developing a recreation master plan for this site.

Until such time as proposed or planned additional recreational facilities are identified, the analysis requested by the commenter is not warranted, and no mitigation measures are necessary. The Placer County Transportation Planning Agency (PCTPA) will continue to work closely with the City of Roseville so that, as plans for the site become more concrete, they can be considered in the Tier 2 environmental process.

#### L-012-011

As the Parkway build alternatives are not located within the City of Roseville, there is no potential for direct physical impacts to land within Roseville, as currently stated in Section 4.1.3.1 of the Draft Tier 1 EIS/EIR. Potential secondary and indirect and cumulative impacts such as those listed by the commenter are evaluated in the Draft Tier 1 EIS/EIR, and are described toward the end of each technical section in Chapter 4 of the document (Sections 4.1 through 4.16). The potential for

indirect impacts to vernal pools is acknowledged on page 4.14-31. Potential impacts on the Reason Farms property, which is owned by the City but which is not currently within the city limits, are identified on page 4.1-28 under "Compatibility with Proposed Land Uses."

**L-012-012**

Please see Master Response 1 and response to Comment L-010-001 regarding the purpose of the buffer and adjustments to the buffer in the context of changing land uses, respectively.

Since this comment was received, the project containing a potential future site for a university has been delayed or withdrawn. There are currently no pending land use applications for the southernmost portion of Reason Farms. However, in the meantime, the City of Roseville has approved the annexation of Reason Farms into the City. As of August 2009, the annexation application is being processed by the Local Agency Formation Commission (LAFCO).

**L-012-013**

In response to the commenter's request, the Draft Tier 1 EIS/EIR is revised to insert the following text on Page 4.1-3 under the sub-heading Growth Management Policy:

Growth Management – Growth Area Policy 5.6. Any development proposal west of Roseville shall aid in regional traffic solutions and in right of way preservation.Growth Area Policy

Growth Management – Growth Area Policy 5.8. Any development proposal west of Roseville shall consider development potential within the entire City/County Memorandum of Understanding Transition Area in the design and sizing of infrastructure improvement.

The following rows are added to Table 4.1-4 under the City of Roseville General Plan:

Growth Area Policy 5.6	Any development proposal west of Roseville shall aid in regional traffic solutions and in right-of-way preservation.	No conflict as proposed	The project purpose is to alleviate regional traffic problems and to preserve right-of-way.	Consistent
Growth Area Policy 5.8	Any development proposal west of Roseville shall consider development potential within the entire City/County Memorandum of Understanding Transition Area in the design and sizing of infrastructure improvement.	No conflict as proposed	The project purpose is to alleviate regional traffic problems and to preserve right-of-way.	Consistent

**L-012-014**

Based on this comment, the Draft Tier 1 EIS/EIR is revised to insert the following sentence in the second to last paragraph of page 4.5-7, after the second sentence:

Since this comment was received, the project containing a potential future site for a university has been delayed or withdrawn. There are currently no pending land use applications for the southernmost portion of Reason Farms. However, in the meantime, the City of Roseville has approved the annexation of Reason Farms into the

City. As of August 2009, the annexation application is being processed by the Local Agency Formation Commission (LAFCO).

**L-012-015**

As part of an ongoing process of consultation and coordination during the Tier 2 EIS/EIR process, the South Placer Regional Transportation Authority (SPRTA) or another California Environmental Quality Act (CEQA) lead agency for the Tier 2 process will consult with potentially affected jurisdictions and property owners regarding potential environmental impacts, and appropriate associated mitigation strategies and measures.

**L-012-016**

With the approval of the Advisory Committees, of which the City of Roseville is a participant, it was determined that Placer Parkway would be designed and constructed to Caltrans' standards, unless specific design exceptions are granted (please see Section 2.2.1 on page 2-1, first paragraph). One reason for this was to avoid precluding potential adoption of Placer Parkway as a state route at some future time. The Tier 2 environmental process is currently anticipated to be a project-level EIS/EIR, even if proposed and funded as a local project, because of the interest of federal agencies in the permitting process for this project and the need for concurrence on the selected alternative.

**L-012-017**

Please see response to Comment L-012-002.

**L-012-018**

On page 4.9-6, the Draft Tier 1 EIS/EIR acknowledges that the Sacramento Metropolitan Air Quality Management District's (SMAQMD) rules and regulations are not applicable or enforceable in the study area. In Section 4.9.4.3, Mitigation Commitments, the Feather River Air

Quality Management District (FRAQMD) and the Placer County Air Pollution Control District (PCAPCD) are repeatedly referred to, not SMAQMD. To clarify the jurisdiction of the FRAQMD and the PCAPCD with respect to the Placer Parkway, the following sentence replaces the second sentence of the text in the second bullet of Section 4.9.5, Tier 1 and Tier 2 Studies:

In addition, SMAQMD's protocol, *Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* (2007a), shall be evaluated and recommendations provided for potential siting of sensitive land uses located in close proximity to the Parkway (i.e., less than 500 feet). The FRAQMD and the PCAPCD shall be consulted regarding additional appropriate protocol to use to evaluate the Parkway's health impacts and to determine the level of significance of such effects on nearby sensitive receptors.

**L-012-019**

It is acknowledged that the SMAQMD's protocol does not automatically require health risk assessments for projects located less than 500 feet from the edge of major roadways, and recommends that such decisions be made based on a range of criteria as the commenter notes, of which distance is one. Because the Parkway is expected to carry more than the average percentage of trucks, and due to the increasing evidence that diesel particulates are harmful to human health, conducting a health risk assessment using the 500-foot criterion is a reasonable and prudent mitigation measure. Please also see response to Comment L-012-018.

**L-012-020**

Please see response to Comment L-010-001, which discusses the potential adjustment of the size and shape of the no-development buffer depending on future land uses. If, during Tier 2, the roadway design

alternatives are located such that sensitive receptors are expected to be located within 500 feet of the Parkway, appropriate evaluation will be undertaken to determine if health risk assessments are required. Please also see response to Comment L-012-019.

The last sentence of the third bullet in Section 4.9.4.3, Tier 2 – Mitigation Commitments, is revised as follows:

Since Placer Parkway would likely be constructed within a 500- to 1,000-foot-wide no-development buffer corridor, unless the size of the buffer is adjusted as described in Section 2.2.4.1 at the bottom of page 2-9, any-development projects would likely could be at least 500 feet from the roadway, depending on the location of the roadway within the corridor, in which case and it is possible that no additional assessment would be required.

**L-012-021**

A consistency analysis with the applicable City of Roseville General Plan policies is included in the Draft Tier 1 EIS/EIR in Section 4.1, Land Use. Specific analysis of the project's consistency with the City's applicable policies is included in Table 4.1-4 on page 4.1-42 of the Draft Tier 1 EIS/EIR. This information is incorporated as a new paragraph at the bottom of page 5-3, Section 5, CEQA Evaluation, as follows:

Placer Parkway would not conflict with City of Roseville General Plan Circulation Policies 1 or 3, Community Form Policies 3 or 4, or Growth Management Policy 8, as described in Table 4.1-4.



**MOTHER LODE CHAPTER**

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September 25, 2007

Celia McAdam  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

RECEIVED

SEP 25 2007

P.C.T.P.A.

**Re: Comments on Draft Tier 1 EIR/EIS for Placer Parkway Corridor Preservation**

Dear Ms. McAdam,

Thank you for the opportunity to comment on the draft Tier 1 EIR/EIS for Placer Parkway. We have a number of concerns with the document. Our over-arching concern is that we believe that the construction of a new freeway in the region is precisely the opposite direction from the one we should be going in transportation planning. Our automobile-dominated transportation system has been costly to society. It has brought us air pollution and sprawl and everything that goes with it, including long commutes and the loss of farmland and natural habitat and open space. Our reliance on fossil fuels has contributed to global warming. We need to move toward providing attractive public transit alternatives to the automobile, with a decreasing emphasis on expanding road capacity.

Purpose and need assumptions:

The EIR/EIS must acknowledge that some of the assumptions that demonstrate the need for increased highway capacity are speculative. Future automobile use based on population projections is speculative. Global warming is likely to lead to decreased use of fossil fuels, and energy costs in general are likely to go up. People may not be driving as much in 2020 as they do today. We are also an aging population, with an increasing segment that will not be able to drive or will prefer not to. Land use patterns are moving toward more compact urban growth with more mixed use, encouraging alternative modes of transportation like walking, biking and transit.

Mitigations for impacts are absent:

The Tier 1 Placer Parkway EIR/EIS is fundamentally flawed because does not provide mitigations for the project's environmental impacts. Instead it defers specific mitigations to a future Tier 2 EIR/EIS, claiming that is acceptable because the Tier 1 EIR/EIS is only for corridor preservation, while Tier 2 is for the project itself. In fact, this document will inform the decision

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**N-001-001**

The Purpose and Need of the Parkway is to reduce future regional and local congestion and advance economic development goals in South Sutter County and southwest Placer County. Assumptions about future travel demand are based on a range of land use and growth projections, described in Section 1.4.3 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. These include Department of Finance projections, which are made 50 years into the future, and Sacramento Area Council of Governments (SACOG) forecasts through 2050. These forecasts together provide a range of potential annual population growth rates, and the Parkway analysis uses a rate that lies between these two forecasts. It also assumes a cumulative 2040 development scenario that reflects growth as presented in the SACOG Preferred Blueprint scenario, a vision for growth that promotes compact, mixed-use development and more transit choices as an alternative to low-density development.

The difficulty of projecting in to the future is acknowledged in the Draft Tier 1 EIS/EIR, as described in Section 3.6.1. Please see response to Comment B-002-008 for a discussion of how the analysis "brackets" a low growth and a high growth scenario.

The Draft Tier 1 EIS/EIR acknowledges the potential for reduced vehicle usage in the future (Section 3.6.2) and the possibility that the Parkway could ultimately be used as a transit route. Please see Master Response 2, which provides information regarding Placer County Transportation Planning Agency transit planning activities.

**N-001-002**

The Draft Tier 1 EIS/EIR does describe specific mitigation commitments that can be made at the Tier 1 level. These are presented in each of the resource impact analysis sections (Sections 4.1 through 4.16). These sections also describe measures that are under consideration and that will be evaluated further once project-specific details have been



**N-001-002** | whether to proceed with the project—that is, if one of the “Build Alternatives” rather than the “No-Build” alternative is chosen. Choosing a corridor route amounts to a de facto decision to move forward with construction of the project. It is misleading to claim that the decision whether or not to build the Parkway will come at Tier 2, since an outcome of this analysis is likely to result in the investment of considerable public funds in acquiring lands for the project.

**N-001-003** | The absence of specific and certain mitigations for environmental impacts runs completely counter to the intent of NEPA and CEQA to provide sufficient information so that decision makers can make informed decisions. This deferral of mitigation to some later document accompanying a later phase of the project amounts to an unlawful segmenting of the project under CEQA.

One example of the lack of specific mitigations regards impacts to vernal pools. The five Build Alternatives would directly impact 106.7 to 127.6 acres of vernal pool complexes. It is stated that “mitigations for impacts to vernal pool species would be consistent with the Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon.” It should be noted that the Recovery Plan calls for preservation of 85% of the remaining vernal pool complexes in the Recovery Unit, implying a 6:1 mitigation ratio for offsite preservation. The EIR/EIS fails to indicate the number of acres, the characteristics and the location of vernal pool complexes that will be preserved to compensate for the loss of vernal pool complexes due to the project. Instead it makes vague references to employing mitigation strategies under the proposed *Placer County Conservation Plan* or a document prepared by the U.S. Dept of Transportation called *Eco-Logical* (Brown, 2006).

**N-001-004** | Growth-Inducing Impacts:  
Claims that the Parkway would not have growth-inducing impacts are not realistic. The EIR/EIS says that the Parkway would serve planned and proposed growth only; that a seven-mile segment that would remain without an interchange would inhibit freeway-induced growth. But the growth-inducing impacts of a major highway through the last large expanse of agricultural open space remaining in west Placer seem undeniable. Pressures to provide additional interchanges would be intense on local government, based on adjacent developments without access, like Brookfield, Creekview SP, Regional University and Curry Creek CP. Even the fee title acquisition or the purchase of conservation easements on the lands in the corridor would be susceptible to eminent domain. We believe the EIS/EIR should reflect that all the present alternative alignments have growth-inducing impacts.

**N-001-005** | Global Warming Impacts:  
The EIR/EIS must recognize “global warming” as an impact area in its analyses of the alternatives. The choice of one of the Build Alternatives will result in varying degrees of emission of greenhouse gases, primarily carbon dioxide, which is leading to changes in the earth’s climate. Our Robust Transit/180 Truck Lanes Alternative (below) would dramatically reduce those effects.

The California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature (March 2006) details the science behind, and the environmental impacts of, global warming. As stated in AB 32, the California Global Warming

developed during the Tier 2 stage. The selection of a corridor during the Tier 1 process does not commit the South Placer Regional Transportation Authority (SPRTA) to the future construction of the Parkway; the selected corridor will be subject to separate environmental view at the Tier 2 stage and the decision whether or not to build the Parkway would be made at the conclusion of the Tier 2 analysis. Given the dearth of available land in and near the study area, any land acquisition made prior to completion of the Tier 2 process could be potentially valuable, particularly for mitigation for other projects, should the Parkway not be constructed.

#### **N-001-003**

More specificity with respect to mitigation is inappropriate because the exact amount of impact is not known. The Draft Tier 1 EIS/EIR conservatively estimates that the entire corridor would be impacted, while the actual right-of-way will not be determined until the Tier 2 process is completed. Estimates of acreages of mitigation for vernal pool impacts in particular are not appropriate at this Tier 1 level of analysis. This analysis used a landscape level of analysis to identify both vernal pools and their uplands collectively, which is also readily acknowledged to be an estimate. During the Tier 2 environmental analysis, surveys will be undertaken in the context of preliminary engineering to more appropriately and accurately identify impacts, so that mitigation can be more precisely identified. Even during project level review, such identification is properly caveated by the eventual permit conditions that would be imposed by the permitting agencies. Please see response to Comments N-001-002 and F-003-006.

#### **N-001-004**

Please see Section 6.1 of the Draft Tier 1 EIS/EIR, which provides a variety of analyses regarding the growth-inducement potential of Placer Parkway. The paragraph above “Land Use Constraints Analysis” on page 6-13 of the Draft Tier 1 EIS/EIR states, “The conclusion drawn

N-001-005

Solutions Act: Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California.

Because global warming significantly impacts the environment, lead agencies must consider their projects' individual and cumulative contributions to this impact in their CEQA analyses. Under CEQA, such impacts must be accompanied by feasible mitigations.

N-001-006

Robust Transit/Interstate 80 Truck Lanes Alternative:

A Robust Transit/Interstate 80 Truck Lanes Alternative should be included in the final set of alternatives. Instead of directing local, state and federal funding toward constructing a new highway, this alternative would direct funding toward extending light rail on major Placer County transportation corridors, providing bus rapid transit connections to light rail stations at Interstate 80 and State Route 65, and providing an enhanced flow of truck traffic on I80. This alternative would reduce or eliminate all the negative environmental impacts now associated with the construction of Placer Parkway.

Beyond those transit improvements in the Assumed Robust Transit System (2.6.1), our proposed Robust Transit Alternative would include, by 2020:

- Light rail on Interstate 80 to SR 65, just east of Roseville.
- Light rail on SR 65 from Interstate 80 to Lincoln.
- BRT on Watt extension from I80 to Blue Oaks; and on Blue Oaks to LRT at SR 65.
- Dedicated truck lanes on I80 and SR 70/99.

Thank you for the opportunity to comment on the Draft Placer Parkway Tier 1 EIR/EIS. Please keep us on your list to receive any updates.

Sincerely,



Terry Davis  
Conservation Program Coordinator

from this review of growth factors and influences and application of various analytical approaches is that the Placer Parkway project **would be growth inducing**, because it would help facilitate planned and proposed developments in the region and it is expected to influence the timing of development in the vicinity of its proposed interchange locations, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development. At the same time, there are indications that the Placer Parkway's contribution to regional growth is limited, as discussed below."

Of particular interest is the discussion under Section 6.1.3.3, The No-Build Alternative, which describes the use of the MEPLAN model in order to add a more quantitative layer to the growth inducement analysis. (Please see also the MEPLAN Technical Report (DKS, 2007), incorporated into the Draft Tier 1 EIS/EIR by reference, and available on the Placer County Transportation Planning Agency website.) This model was used in the SACOG Blueprint project (SACOG, 2004) and the Mineta Foundation Report on transit-oriented development and land use scenarios (Johnston et al., 2004). This model predicted very modest increases in growth associated with the Parkway, as described in the Draft Tier 1 EIS/EIR and the MEPLAN Technical Report.

The commenter is directed to the Placer Parkway Community Impact Assessment (Mara Feeney and Associates and North Fork Associates, 2007) for a complete analysis of the growth-inducement potential of the Parkway, and to Section 2.2 of Appendix G of the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR, circulated for public comment on January 30, 2009, for a summary of the Draft Tier 1 EIS/EIR conclusions on growth inducement.

Please also see Master Response 1, which describes additional analysis that was undertaken following publication of the Draft Tier 1 EIS/EIR, in order to address U.S. Environmental Protection Agency concerns about

project-induced growth and the potential independent construction by others of future additional interchanges with the Parkway, absent a mechanism to guarantee perpetuation of a conservation easement in perpetuity.

**N-001-005**

Please see Section 4.9.3.7 of the Draft Tier 1 EIS/EIR, which includes an evaluation of greenhouse gases that could be generated as a result of the Parkway. Additional discussion of climate change is provided in Section 3.5 of the PRD. More specific analysis will be conducted in the Tier 2 level of analysis.

**N-001-006**

As discussed in Section 2.5.4 of the Draft Tier 1 EIS/EIR (pages 2-30 through 2-36), several “Avoidance Alternatives” were defined and evaluated as part of the modified National Environmental Policy Act/404 process. As discussed in Section 2.6 (pages 2-36 through 2-41), a Land Use and Policy Scenario was also evaluated. These alternatives and scenario included a very “robust” transit system that included light rail along the Interstate 80 (I-80) corridor to State Route (SR) 65, Bus Rapid Transit (BRT) in three corridors (including along Watt Avenue and Blue Oaks Boulevard), and a total increase in bus-miles of 320 percent over today’s transit system in Placer County. While the assumed transit system did not include light rail along SR 65, it included BRT along that corridor and along the I-80 High Occupancy Vehicle (HOV) lanes.

It is assumed that the alternative requested by the commenter would include the widening of I-80 and SR 70/99 to provide dedicated truck lanes on those freeways. The various alternatives and scenarios evaluated in the Draft Tier 1 EIS/EIR did include assumptions in the adopted Metropolitan Transportation Plan, which included widening of portions of I-80 to provide HOV lanes, but these alternatives and scenarios did not assume widening of I-80 or SR 70/99 to provide

dedicated truck lanes.

The analyses of the of the Avoidance Alternatives and the Land Use and Policy Scenario, which included a robust transit system, indicated that alternatives and scenarios would not meet the Purpose and Need for the project, and were thus eliminated from further consideration. The widening of I-80 and/or SR 70/99 to provide dedicated truck lanes may be worthwhile projects to relieve traffic congestion in those corridors. However, the addition of truck lanes on those freeways, even coupled with a robust transit system, would not provide a significant reduction in traffic congestion on the local roadway system in southwest Placer County and South Sutter County and thus would not meet the Purpose and Need for the project.

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

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AUG - 9 2007  
P.C.T.P.A.



August 8, 2007

Celia McAdam  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

RE: Placer Parkway Corridor Preservation, SCH# 2003092069

Dear Ms. McAdam:

As the state agency responsible for rail safety within California, we recommend that this project be planned with the safety of the two rail corridors in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings.

All options except the no project option propose two new highway-rail crossings, and therefore a discretionary permit for authority to construct is required from the Commission. The Commission will be a responsible party under CEQA and the impacts of the crossing must be discussed within the environmental documents.

Of specific concern is the potential impact if a new on-ramp or off-ramp were proposed near an at-grade highway-rail crossing.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles  
Environmental Specialist  
Rail Crossings Engineering Section  
Consumer Protection and Safety Division

cc: Terrel Anderson, Union Pacific Railroad

**S-001-001**

The proposed Placer Parkway build alternatives all identify new grade-separated railroad crossings as opposed to at-grade crossings. No new roadways or ramps are anticipated near existing at-grade crossings. As part of the Tier 2 environmental review process, potential impacts on both new grade-separated crossings and existing at-grade crossings will be analyzed. As part of this process, Placer County Transportation Planning Agency or the California Environmental Quality Act lead agency will consult with the Public Utilities Commission so that this project improves both safety and mobility in the corridor.

S-001-001

## DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 942360001  
(916) 653-5791



July 13, 2007

Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, California 95603

Placer Parkway Corridor Preservation Tier 1 EIS/EIR  
State Clearinghouse (SCH) Number: 2003092069

S-002-001

The project corresponding to the subject SCH identification number has come to our attention. The limited project description suggests your project may be an encroachment on the State Adopted Plan of Flood Control. You may refer to the California Code of Regulations, Title 23 and Designated Floodway maps at <http://recbd.ca.gov/>. Please be advised that your county office also has copies of the Board's designated floodways for your review. If indeed your project encroaches on an adopted food control plan, you will need to obtain an encroachment permit from the Reclamation Board prior to initiating any activities. The attached Fact Sheet explains the permitting process. Please note that the permitting process may take as much as 45 to 60 days to process. Also note that a condition of the permit requires the securing all of the appropriate additional permits before initiating work. This information is provided so that you may plan accordingly.

If after careful evaluation, it is your assessment that your project is not within the authority of the Reclamation Board, you may disregard this notice. For further information, please contact me at (916) 574-1249.

Sincerely,

A handwritten signature in blue ink that reads "Chris Huit".

Christopher Huit  
Staff Environmental Scientist  
Floodway Protection Section

cc: Governor's Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

**S-002-001**

The commenter identifies that Placer Parkway may be an encroachment on the State Adopted Plan of Flood Control, and that an encroachment permit from the Reclamation Board may be needed prior to initiating any activities. The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR acknowledges that the proposed roadway would cross floodplains (please see Section 4.11.3.3). As the current process is a Tier 1 document and no construction would take place until after preparation of a subsequent Tier 2 project-level environmental review, and project approval, no permit is applicable at this time. The information provided by the commenter will be helpful in later phases of the project.

## Encroachment Permits Fact Sheet

### **Basis for Authority**

State law (Water Code Sections 8534, 8608, 8609, and 8710 – 8723) tasks the Reclamation Board with enforcing appropriate standards for the construction, maintenance, and protection of adopted flood control plans. Regulations implementing these directives are found in California Code of Regulations (CCR) Title 23, Division 1.

### **Area of Reclamation Board Jurisdiction**

The adopted plan of flood control under the jurisdiction and authority of the Reclamation Board includes the Sacramento and San Joaquin Rivers and their tributaries and distributaries and the designated floodways.

Streams regulated by the Reclamation Board can be found in Title 23 Section 112. Information on designated floodways can be found on the Reclamation Board's website at [http://recbd.ca.gov/designated\\_floodway/](http://recbd.ca.gov/designated_floodway/) and CCR Title 23 Sections 101 - 107.

### **Regulatory Process**

The Reclamation Board ensures the integrity of the flood control system through a permit process (Water Code Section 8710). A permit must be obtained prior to initiating any activity, including excavation and construction, removal or planting of landscaping within floodways, levees, and 10 feet landward of the landside levee toes. Additionally, activities located outside of the adopted plan of flood control but which may foreseeable interfere with the functioning or operation of the plan of flood control is also subject to a permit of the Reclamation Board.

Details regarding the permitting process and the regulations can be found on the Reclamation Board's website at <http://recbd.ca.gov/> under "Frequently Asked Questions" and "Regulations," respectively. The application form and the accompanying environmental questionnaire can be found on the Reclamation Board's website at <http://recbd.ca.gov/forms.cfm>.

### **Application Review Process**

Applications when deemed complete will undergo technical and environmental review by Reclamation Board and/or Department of Water Resources staff.

### Technical Review

A technical review is conducted of the application to ensure consistency with the regulatory standards designed to ensure the function and structural integrity of the adopted plan of flood control for the protection of public welfare and safety. Standards and permitted uses of designated floodways are found in CCR Title 23 Sections 107 and Article 8 (Sections 111 to 137). The permit contains 12 standard conditions and additional special conditions may be placed on the permit as the situation warrants. Special conditions, for example, may include mitigation for the hydraulic impacts of the project by reducing or eliminating the additional flood risk to third parties that may caused by the project.

Additional information may be requested in support of the technical review of

your application pursuant to CCR Title 23 Section 8(b)(4). This information may include but not limited to geotechnical exploration, soil testing, hydraulic or sediment transport studies, and other analyses may be required at any time prior to a determination on the application.

#### Environmental Review

A determination on an encroachment application is a discretionary action by the Reclamation Board and its staff and subject to the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code 21000 et seq.). Additional environmental considerations are placed on the issuance of the encroachment permit by Water Code Section 8608 and the corresponding implementing regulations (California Code of Regulations – CCR Title 23 Sections 10 and 16).

In most cases, the Reclamation Board will be assuming the role of a "responsible agency" within the meaning of CEQA. In these situations, the application must include a certified CEQA document by the "lead agency" [CCR Title 23 Section 8(b)(2)]. We emphasize that such a document must include within its project description and environmental assessment of the activities for which are being considered under the permit.

Encroachment applications will also undergo a review by an interagency Environmental Review Committee (ERC) pursuant to CCR Title 23 Section 10. Review of your application will be facilitated by providing as much additional environmental information as pertinent and available to the applicant at the time of submission of the encroachment application.

These additional documentations may include the following documentation:

- California Department of Fish and Game Streambed Alteration Notification (<http://www.dfg.ca.gov/1600/>),
- Clean Water Act Section 404 applications, and Rivers and Harbors Section 10 application (US Army Corp of Engineers),
- Clean Water Act Section 401 Water Quality Certification, and
- corresponding determinations by the respective regulatory agencies to the aforementioned applications, including Biological Opinions, if available at the time of submission of your application.

The submission of this information, if pertinent to your application, will expedite review and prevent overlapping requirements. This information should be made available as a supplement to your application as it becomes available. Transmittal information should reference the application number provided by the Reclamation Board.

In some limited situations, such as for minor projects, there may be no other agency with approval authority over the project, other than the encroachment permit by Reclamation Board. In these limited instances, the Reclamation Board



may choose to serve as the "lead agency" within the meaning of CEQA and in most cases the projects are of such a nature that a categorical or statutory exemption will apply. The Reclamation Board cannot invest staff resources to prepare complex environmental documentation.

Additional information may be requested in support of the environmental review of your application pursuant to CCR Title 23 Section 8(b)(4). This information may include biological surveys or other environmental surveys and may be required at anytime prior to a determination on the application.

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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



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JUL 26 2007

P.C.T.P.A.

July 22, 2007

File No.: 220.10284.11784.SCH#2003092069

Ms. Celia McAdam  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

Dear Ms. McAdam:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Draft Environmental Impact Report for the Placer Parkway Corridor Preservation Project SCH#2003092069. We support the future development of the Placer Parkway as an alternate route to relieve congestion; however, we believe this project will impact the mission of the CHP of providing safety and service of the public as they use the highway transportation system within Placer County. The project as outlined has five build alternatives and one no-build alternative. We support the development of the Placer Parkway and do not have a preference on any of the five build alternatives.

The effect this project will have over the Auburn CHP Area could be significant in the number of motorists it will attract. The proposed plan encompasses a high speed, four to six lane, limited access roadway. We feel this project would require an additional five officers to adequately patrol this roadway 24 hours per day, seven days per week, 365 days per year. There are no immediate plans to augment the workforce in the Auburn CHP Area Office. This is an area that should be discussed as this project, along with several other major developments within the immediate vicinity, will have a major impact on traffic.

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

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

*Safety, Service, and Security*

**S-003-001**

The commenter supports the future development of the Parkway. This comment is noted.

**S-003-002**

The commenter states that Placer Parkway and other major developments within the immediate vicinity would have a negative impact on the Auburn California Highway Patrol's ability to fulfill its mission at its current rate of staffing. In Section 4.5.3.4, the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR acknowledges that, "Placer Parkway would cause both beneficial and adverse impacts to the public services ... in the study area. Placer Parkway could improve access, reduce travel times, and reduce traffic congestion on local roadways used by current and future residents. In addition, response times for protective and emergency services could improve due to the reduction in travel times and congestion...The Parkway could result in increased congestion on some roadway segments ... which could adversely affect travel in these areas." The commenter's concern with being able to adequately staff for the expected level of growth is noted.

In Section 4.5.5, Tier 1 and Tier 2 Studies, the Draft Tier 1 EIS/EIR states that analysis begun in the Tier 1 stage will be undertaken in greater detail in the Tier 2 stage. Specifically, "Coordination of project planning with maintenance operations and protective and emergency service providers will be focused on addressing service provider concerns and minimizing any potential to adversely affect safety or response times."

S-003-001  
S-003-002

Ms. Celia McAdam  
Page 2  
July 22, 2007

S-003-002

traffic along this major route. Any significant increase in growth will further adversely affect these major routes of travel.

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

Sincerely,

A handwritten signature in blue ink that reads "D. Milligan (For)".

RICK WARD, Captain  
Commander  
Auburn Area

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



US Fish & Wildlife Service  
 Sacramento Fish and Wildlife Office  
 2800 Cottage Way, Room W-2605  
 Sacramento, CA 95825  
 (916) 414-6800  
 FAX (916) 414-6712



Department of Fish and Game  
 Sacramento Valley-Central  
 Sierra Region  
 1701 Nimbus Road, Suite A  
 Rancho Cordova, CA 95670  
 FAX (916) 358-2912

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SEP 06 2007

P.C.T.P.A.

U.S Fish and Wildlife Service File # 1-1-07-TA-1484

Celia McAdam, Executive Director  
 Placer County Transportation Planning Agency  
 299 Nevada Street  
 Auburn, CA 95603

Subject: Comments on the Draft Tier 1 Environmental Impact  
 Statement/Environmental Impact Report for the Proposed Placer Parkway Project  
 in Sutter and Placer Counties, California

Dear Ms. McAdam:

The California Department of Fish and Game (DFG) and the U.S. Fish and Wildlife Service (Service) have reviewed the Draft Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/Program Environmental Impact Report (EIS/EIR) (Report # FHWA-CA-DEIS 2007-46, SCH# 2003092069) (proposed project). This Tier 1 EIS/EIR analyzes the environmental impacts associated with the selection of a corridor from five alternative alignments for Placer Parkway. The proposed project is designed to connect State Route (SR) 65 in Placer County with SR 70/99 in Sutter County. Subsequent Tier 2 documents would provide specific onsite analysis of the selected alternative, ultimately resulting in construction of a 6-lane highway project ranging in length, depending on alternative selected, from about 14.2 to 16.2 miles and directly impacting (impervious surfaces) from 622 to 745 acres.

Significant natural resources of the plan area include stream and riparian habitats, wetlands including vernal pools and upland grasslands and associated federally-listed invertebrates, and both nesting and foraging habitat (grasslands) for the state listed threatened Swainson's hawk (*Buteo swainsonii*). The federally-listed invertebrates of concern include the endangered Conservancy fairy shrimp (*Branchinecta conservatio*), the endangered vernal pool tadpole shrimp (*Lepidurus packardii*), and the threatened vernal pool fairy shrimp (*Branchinecta lynchi*). The area in and around the site of the proposed project also provides important resting and foraging habitat for winter migrant bird species including waterfowl of the Pacific Flyway. The majority of the proposed alternative lands are undeveloped, although several large urban development projects are being proposed or considered within the area.

S-004-001

Currently, all alternatives occur within a large block of nonfragmented vernal pool and grassland habitat. Based on work completed and provided by Placer County, western Placer

**S-004-001**

This Comment Letter is the same Comment Letter as Comment Letter F-003. It is included again here as a "State Agency" Comment Letter because it was jointly written by the U.S. Fish and Wildlife Service and the California Department of Fish and Game. All comments were responded to in responses to Comment Letter F-003. This reference is included here for completeness.

Please see response to Comment F-003-001.

Ms. Celia McAdam

2

S-004-001

County supports only about 20,000 acres of vernal pool grassland habitat. This acreage of remaining vernal pool grassland habitat is only a small percent of historical levels of this habitat type in the County; about 5,000 acres of this total habitat acreage in Placer County is within existing preserves and, subsequently, about 15,000 acres of this habitat remain vulnerable to urban impact. The proposed project, along with other reasonably foreseeable proposed or considered development in western Placer County, pose significant risk to the persistence of at least 50 percent, or more, of these 15,000 acres as habitat.

The DFG is providing comments in response to the Draft EIS/EIR as trustee for the State's fish and wildlife resources, and which has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of such species. In that capacity, the DFG administers the California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and other provisions of the California Fish and Game Code that affords protection to the State's fish and wildlife trust resources. The DFG also considers issues as related to the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703-712). The Service is providing comments in accordance with the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (ESA), and the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703-712).

The DFG and the Service have the following comments:

Existing Conditions/Affected Environment

S-004-002

Section 2.6.2, Sacramento Area Council of Governments's (SACOG) Blueprint, page 2-38 and 2-39: The land use and policy scenario used in this document "assumes an "aggressive" implementation of the Blueprints Smart Growth land use/design principles on a regional basis". We believe that the approval of the Placer Vineyards development by the Placer County Board of Supervisors in a manner inconsistent with SACOG's Blueprint is a fundamental flaw for the basis of any conclusions in this document regarding future land use. Failure by the Board to pursue an increased density project allowing for 21,000 units, as suggested by SACOG, and approving instead a 14,000 unit project will result in additional loss of land to accommodate the additional needed units.

Potential Project Impacts

Direct and Indirect Impacts

S-004-003

Vernal pool species are threatened primarily by loss and fragmentation of existing habitat. Vernal pool complexes, which are mosaics of wetted pools which are hydrologically connected and include the associated upland habitat and local watersheds essential for the function of the pools, must be preserved on a landscape level to ensure the persistence of the species that inhabit them. Although dispersal of vernal pool crustaceans between complexes is and probably always has been relatively low, fragmentation of existing intact complexes could contribute to the loss of genetic diversity of vernal pool species, and reduce the likelihood of

S-004-002

Please see response to Comment F-003-002.

S-004-003

Please see response to Comment F-003-003.

S-004-003

recolonization from other populations. Fragmentation by conversion or degradation of habitat may essentially serve as a barrier to dispersal. It is essential that large, contiguous areas of uninterrupted vernal pool habitat, including both wetted and upland components, be preserved across the range of each of the listed species to “buffer” against unforeseen stochastic events.

The document in discussing Evaluation Criteria states, in part, on page 4.14-11, second bullet, “Substantial interference with the movement....”. We have concluded, using this criteria and an abundance of scientific literature concerning habitat fragmentation, that conclusions reached on page 4.14-31, second paragraph, concerning the degree to which each alternative would impact hydrology and habitat loss and fragmentation must be followed by conclusions in this document that indirect impacts as a result of this project will be significant.

Cumulative Impacts

S-004-004

Executive Summary, page ES-5 under Opening Year – 2020: The Service and the DFG, along with other regulatory agencies, have been meeting regularly with the City of Roseville and proponents for the Creekview and Sierra Vista Specific Plan projects. Both projects are being considered for annexation into Roseville, and are being actively planned and analyzed. Given the current high demand for residential housing in western Placer County, we believe that it reasonable to assume that the proposed projects listed under the second bullet may be built or at the least underway as of the year 2020, and should be considered as cumulative effects.

S-004-005

Page 4.14-32, Paragraph 3, first sentence: We concur that the proposed project is located primarily “within areas already proposed for future urban uses”. We believe that to conclude, as this document asserts, that the proposed project will not significantly increase cumulative impacts resulting in habitat fragmentation is unfounded and speculative. First, most all of the land within the central portion of the proposed project in Placer County is currently designated in the Placer County General Plan and zoned for agricultural uses. This does not prevent or preclude any landowner from proposing any project. To thus conclude that a proposal equates to a completed project is inaccurate. Second, the proposed project, even with some element of future growth within the project area, will directly impact animal movement and result in habitat fragmentation and population isolation. The degree to which the proposed project will contribute to this future cumulative impact scenario is unknown because the level of future urban growth is not known, however to conclude other than a significant level of impact is not supported. We conclude that analysis for all of the alternatives has failed to adequately analyze or consider the contribution that the proposed project will have to either the additional increment of urban development or the specific location of that development. We believe that each alternative will impact both levels of growth and the ultimate location of that growth.

Proposed Mitigation and Compensation

S-004-006

Section 4.14.4.3, Tier 2 Mitigation Commitments: The document considers and evaluates habitat fragmentation and concludes these issues to be substantial, however the document fails (basis for need to provide mitigation and compensation is provided in discussion on Indirect

S-004-004

Please see response to Comment F-003-004.

S-004-005

Please see response to Comment F-003-005.

S-004-006

Please see response to Comment F-003-006.

S-004-006

Impacts above) to identify any measures designed to compensate and mitigate for these impacts. We suggest that additional compensation and mitigation measures are included that address the need to minimize impacts to wildlife movement by the inclusion of such measures as wildlife undercrossings and drift fences.

S-004-007

The document has not provided specific standards for compensation and mitigation by which future specific measures will be based in the Tier 2 analysis. We believe this is an improper deferral of compensation and mitigation measures and suggest that specific standards be developed for acreage and habitat types that will be required to compensate and mitigate for project impacts. We do not believe it appropriate to consider this mitigation measure as anything other than a commitment rather than a consideration.

S-004-008

The document has failed to identify mitigation measures for any cumulative impacts that can be attributed to this project. Discussion on page 6-3, last paragraph, states that buffers will assure that the project will not contribute to future growth. Buffers do not and will not preclude future growth. However, there is no additional mention of any mechanism by which the future growth will be constrained. We are concerned that given the extent of planned residential development in the area that the pressure for more accessibility to the proposed project is imminent at some point in the future. We suggest, to assure this project does not facilitate additional growth through construction of interchanges, that all proposed buffers be fully protected by establishment of a conservation easement designed to preclude any future urban development or road construction of any kind. This should be included as a commitment in this document.

Alternative Selection

S-004-009

We do not believe that a quantitative comparison of each alternative corridor alignment, as suggested in this document, provides the most meaningful analysis of project alternatives. In this regard, although the northerly alternatives may impact less acreage and less wetlands, directly, they alternatively provide the greatest degree of habitat fragmentation and thus the highest likelihood of population isolation. The southerly alternatives, and most notably, Alternative 1, although quantitatively may result in greater direct impacts based on some of the metrics used in this document, results in substantially and significantly lower likelihood and less risk of habitat fragmentation and or population isolation. This conclusion is supported by both currently proposed and likely future projects and an analysis of the cumulative impacts of these projects in conjunction with this proposed project. Approval of Placer Vineyards by Placer County assures a large urban development immediately adjacent to the most southerly alignment and thus lands between Alternative 1 and Placer Vineyards are a significant and substantially smaller block of habitats than more northerly alignments. Agency analysis, based upon the ability of each alternative to preserve large blocks of unbroken habitat, suggests that habitat fragmentation would be increasingly severe as alternatives move north. Simply, each alternative bisects the study area resulting in two remaining habitat blocks. The premise that larger habitat blocks result in greater species diversity and higher likelihood of long term conservation is well founded in scientific literature. We believe that consideration of habitat fragmentation and

S-004-007

Please see response to Comment F-003-006.

S-004-008

Please see response to Comment F-003-008.

S-004-009

Please see response to Comment F-003-009.

Ms. Celia McAdam

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S-004-009

population isolation is a superior metric when considering selection of a preferred project alternative. Habitat fragmentation was a principal justification for the Federal listing of vernal pool invertebrates (Federal Register 59: 48136-48153).

S-004-010

Additionally, regarding the potential for Placer County to successfully implement the proposed Placer County Conservation Plan (PCCP), as discussed on page 14.14-35, we believe that Alternative 1 would provide a substantially greater opportunity, along with other land in western Placer County, for conservation provided lands north of the alternative were dedicated to long term conservation purposes as proposed in some PCCP alternatives.

S-004-011

Regarding the Natomas Basin Habitat Conservation Plan (NBHCP), the portions of the alternatives east of SR 99 in Sutter County are located in the permitted (for development) area. It is unclear if the portions to the west of SR 99 are permitted for development. Successful implementation of the NBHCP is premised on all the area in the Natomas Basin outside of the permit areas remaining undeveloped for the benefit of the covered species. The DFG and the Service consider all land in the Natomas Basin as habitat for one or more of the covered species. PCTPA should consider what the effect of the loss of this habitat cumulatively with other projects in the unpermitted area will effect implementation of the NBHCP.

Conclusion

S-004-012

We have concluded that Alternative 1 is the superior alternative and recommend the selection of this alternative for Tier 2 analysis. This agency recommendation is consistent with discussions over the last several years during meetings with you and other State and Federal agencies. We believe that the Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers (Corps) have also consistently recommended that Alternative 1 is superior.

Thank you for the opportunity to review this project. If we can be of further assistance, at DFG please contact Mr. Jeff Finn, Environmental Scientist, at (530) 477-0308 or Mr. Jeff Drogensen, Senior Environmental Scientist, at (916) 358-2919 and at the Service please contact Jana Milliken, Acting Sacramento Valley Branch Chief, at (916) 414-6561 or Ken Sanchez, Assistant Field Supervisor, at (916) 414-6622.

Sincerely,



Kenneth Sanchez  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service

Sincerely,



Kent Smith  
Acting Regional Manager  
California Department of Fish and Game

S-004-010

Please see response to Comment F-003-010.

S-004-011

Please see response to Comment F-003-011.

S-004-012

Please see response to Comment F-003-012.



Ms. Celia McAdam

6

Literature Cited:

U.S. Fish and Wildlife Service. 2005. Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. Portland, Oregon. xxvi + 606 pages.

cc: Mr. Kent Smith  
Mr. Jeff Finn  
Department of Fish and Game  
Sacramento Valley-Central Sierra Region  
1701 Nimbus Road, Suite A  
Rancho Cordova, California 95670

Ms. Jana Milliken  
Mr. Ken Sanchez  
Mr. Eric Tattersall  
U. S. Fish and Wildlife Service  
2800 Cottage Way, Room W2605  
Sacramento, CA 95825-1888

Mr. Dave Smith  
Ms. Erin Forsman  
Wetlands Regulatory Office (WTR-8)  
EPA Pacific Southwest Region  
75 Hawthorne Street  
San Francisco, CA 94105

Mr. Tom Cavanaugh, Project Manager  
U.S. Army Corps of Engineers, Sacramento District  
Sacramento Valley Office  
1325 J Street, Room 1480  
Sacramento, CA 95814-2922

Mr. John Baker  
National Marine Fisheries Service  
650 Capitol Mall, Suite 8-300  
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Mr. Loren Clark  
Assistant Planning Director  
Placer County Planning Department  
11414 B Avenue  
Auburn, CA 95603

Ms. Celia McAdam

7

State of California  
Office of Planning and Research  
PO Box 3044  
Sacramento, CA 95812-3044



## DEPARTMENT OF CONSERVATION

### DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEBSITE conservation.ca.gov

August 17, 2007

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AUG 27 2007

P.C.T.P.A.

**VIA FACSIMILE (530) 823-4036**

Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

Subject: Placer Parkway Corridor Preservation Project Draft EIR (Placer County)  
**SCH# 2003092069**

Dear Ms. McAdam:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the draft EIR (DEIR) for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources.

Project Description

The purpose of the Placer Parkway Corridor Preservation Project (Project) is to select a corridor (among five alternatives) for the future construction of the Placer Parkway (Parkway). The Parkway is an east-west roadway that will link SR 70/99 in Sutter County with SR 65 in Placer County. The width of such a corridor will be approximately 500-1000 feet wide. The potential conversion of farmland associated with the five corridor alternatives would be substantial – approximately 792.46 to 990.06 acres of farmland would be converted resulting from the Parkway alone. The amount of Williamson Act land that would be impacted would range from 119.85 to 240.26 acres of contracted land. Anticipated urban development and roadway projects (excluding the Parkway) would convert an additional 13,569 acres of Farmland of Statewide and Local Importance, Prime Farmland, Unique Farmland, and grazing land. This converted farmland would also include an additional 717 acres of contracted land between the two counties.

Project Impacts on Agricultural Land

The DEIR states that potential adverse impacts on farmlands associated with the Parkway could contribute to cumulative impacts associated with the planned and proposed development in the study area. Given the recent and projected rapid growth in both

*The Department of Conservation's mission is to protect Californians and their environment by:  
Protecting lives and property from earthquakes and landslides; Ensuring safe mining and oil and gas drilling;  
Conserving California's farmland; and Saving energy and resources through recycling.*

### S-005-001

An analysis of the study area's growth (past activities) and the associated impacts on Important Farmland and Williamson Act contracted land is included in Section 4.4 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. The past activities analysis includes an agricultural production values five-year trend (please see Section 4.4.2.1); an analysis of the past and existing crops and agricultural products produced in the study area (please see Section 4.4.2.2); a ten-year trend analysis of farmland conversion within the study area (please see Section 4.4.2.2); and an overview of the Williamson Act enrollment and non-renewal trends within the study area (please see Section 4.4.2.4). The Draft Tier 1 EIS/EIR comprehensively analyzes all of the past, present, and future cumulative impacts to Important Farmland and Williamson Act contracted land within the study area. The cumulative analysis of the project's potential effects on Important Farmland and Williamson Act contracted land was included in the Draft Tier 1 EIS/EIR in Section 4.4.3.5. The analysis is based on the potential impacts of the project and the past activities, and approved (present) and planned (future) projects within the study area.

Please see response to Comment B-003-002 regarding updates to the farmland mapping presented in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR, circulated for public comment on January 30, 2009.

S-005-001

**S-005-001** | counties, the Department recommends a more comprehensive cumulative impact analysis, which should include consideration of past and future projects, as well as any other projects taking place within the same time period.

Mitigation Measures

**S-005-002** | The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. The DEIR mentions several mitigation/minimization/avoidance considerations. Of these considerations, the Department recommends the use of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. If a Williamson Act contract is terminated, or if growth inducing or cumulative agricultural impacts are involved, the Department recommends that this ratio of conservation easements to lost agricultural land be increased. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence the search for replacement lands should be conducted regionally or statewide, and not limited strictly to lands within the project's surrounding area.

**S-005-003** | Other forms of mitigation may be appropriate for this project, including:

- Protecting farmland in the project area or elsewhere in the County through the use of less than permanent long-term restrictions on use such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.).
- Directing a mitigation fee to invest in supporting the commercial viability of the remaining agricultural land in the project area, County or region through a mitigation bank that invests in agricultural infrastructure, water supplies, marketing, etc.

The Department also has available a listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report may be requested from the Division at the address or phone number below. General information about agricultural conservation easements, the Williamson Act, and provisions noted above is available on the Department's website, or by contacting the Division at the address and phone number listed below. The Division's website address is:

**S-005-002**

Specific mitigation measures are not feasible at this time given the Tier 1 level of review provided in this Draft Tier 1 EIS/EIR. During the Tier 2 environmental review process, project-specific mitigation measures will be developed. Mitigation measures similar to those proposed by the commenter will be considered, as evidenced by the third bullet on page 4.4-23 under the Tier 2 – Mitigation Considerations subheading (please see response to Comment L-005-001 for the text of the mitigation strategy).

One of the evaluation criteria used to assess impacts to farmland was whether or not the project exceeded the California Environmental Quality Act 100-acre threshold for assessing a project's potential to be of statewide, regional, or areawide significance, as explained in Section 4.4.3.2 on page 4.4-17 of the Draft Tier 1 EIS/EIR. Each of the proposed corridor alignment alternatives would potentially impact more than 100 acres of Williamson Act contracted land, and therefore each of the proposed build alternatives is considered to have statewide, regional, or areawide impacts. Specific mitigation strategies that would be implemented during the Tier 2 process are presented on pages 4.4-23 and 4.4-24 of the Draft Tier 1 EIS/EIR.

**S-005-003**

Please see response to Comment S-005-002 for a discussion of the proposed Tier 2 Mitigation Considerations listed in the Draft Tier EIS/EIR, which are consistent with the agricultural mitigation approach suggested by the commenter.

<http://www.conservation.ca.gov/dlrp/index.htm>

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

#### Williamson Act Lands

Under California Code of Regulations Section 15206(b)(3), a project is deemed to be of statewide, regional or area-wide significance if it will result in cancellation of a Williamson Act contract for a parcel of 100 or more acres. Since lands under Williamson Act contracts and/or in agricultural preserves exist in the project area, the Department recommends that the following information be provided in the final EIR (FEIR):

- S-005-004 • A map detailing the location of agricultural preserves and contracted land within each preserve. The FEIR should also tabulate the number of Williamson Act acres, according to land type (e.g., prime or non-prime agricultural land), which could be impacted directly or indirectly by the project.
- S-005-005 • A discussion of Williamson Act contracts that may be terminated in order to implement the project. The FEIR should discuss the probable impacts on nearby properties resulting from the termination of adjacent Williamson Act contracts. For example, a termination of a Williamson Act contract may have a growth-inducing impact. In other words, a termination may not only lift a barrier to development, but also result in higher property taxes, and thus, an incentive to shift to a more intensive land use, such as urban development.
- S-005-006 • As a general rule, land can only be withdrawn from a Williamson Act contract through the nine-year non-renewal process. Immediate termination via cancellation is reserved for "extraordinary circumstances" (See Sierra Club v. City of Hayward (1981) 28 Cal.3d 840, 852-855). Under Government Code section 51282, the city or county must approve a request for cancellation and base that approval on specific findings that are supported by substantial evidence. When cancellation is proposed, the Department recommends that a discussion of the findings be included in the FEIR. Finally, a notice of the hearing to approve the tentative cancellation and a copy of the landowner's petition must be mailed to the Director of the Department ten working days prior to the hearing. (The notice should be mailed to Bridgett Luther, Director, Department of Conservation, c/o Division of Land Resource Protection, 801 K Street MS 18-01, Sacramento, CA 95814-3528.)
- S-005-007 • Under Government Code Section 51243, if a city annexes land under a Williamson Act contract, the city must succeed to all rights, duties, and powers of the county under the contract. However, under Section 51243.5, a city may exercise its option not to succeed to the contract if certain conditions are met. LAFCO must notify the Department within 10 days of a city's proposal to annex land under a contract (Government Code Section 56753.5). Additionally, LAFCO must not approve a change to a sphere of influence or annexation of contracted land to a city unless

#### **S-005-004**

The Draft Tier 1 EIS/EIR addresses the potential direct and cumulative impacts with regards to Important Farmland and Williamson Act contracted land. Tables 4.4-10 and 4.4-11 on page 4.4-22 of the Draft Tier 1 EIS/EIR quantitatively identify the potential direct and cumulative impacts to Important Farmland and Williamson Act contracted land respectively, for each of the proposed alternatives. An analysis of potential secondary and indirect impacts of each proposed build alternative is included on pages 4.4-20 and 4.4-21 of the Draft Tier 1 EIS/EIR. The level of detail requested by the commenter is not required at the Tier 1 level of analysis.

#### **S-005-005**

Direct and cumulative impacts to Williamson Act contracted land are identified in Tables 4.4-9 and 4.4-11 on pages 4.4-19 and 4.4-22 of the Draft Tier 1 EIS/EIR. Growth inducing effects of the proposed project were evaluated in Section 6.1 of the Draft Tier 1 EIS/EIR. Specifically, the Findings and Conclusions in Section 6.1.4 on page 6-12 of the Draft Tier 1 EIS/EIR states the following with regard to the project's ability to induce growth: "The conclusion drawn from this review of growth factors and influences and application of various analytical approaches is that the Placer Parkway project **would be growth inducing**, because it would help facilitate planned and proposed developments in the region and it is expected to influence the timing of development in the vicinity of its proposed interchange locations, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development."

In addition, secondary and indirect impacts associated with growth were also evaluated in the Draft Tier 1 EIS/EIR, including the potential secondary and indirect effects of the project related to farmlands, which are discussed on page 6-16 of the Draft Tier 1 EIS/EIR. The level of

Celia McAdam  
August 17, 2007  
Page 4 of 4

S-005-007

certain conditions are met (see Government Code Sections 51296.3, 56426, 56426.5, 56749 and 56856.5).

- If portions of the planning area are under Williamson Act contracts (and will continue to be under contract after project implementation) the FEIR should discuss the proposed uses for those lands. Uses of contracted land must meet compatibility standards identified in Government Code Sections 51238 - 51238.3. Otherwise, contract termination (see paragraph above) must occur prior to the initiation of the land use.
- An agricultural preserve is a zone authorized by the Williamson Act and established by the local government to designate qualified land to be placed under the Williamson Act's 10-year contracts. Preserves are also intended to create a setting for contract-protected lands that is conducive to continuing agricultural use. Under Government Code Section 51230, "An agricultural preserve may contain land other than agricultural land, but the use of any land within the preserve and not under contract shall within two years of the effective date of any contract on land within the preserve be restricted by zoning, including appropriate minimum parcel sizes that are at a minimum consistent with this chapter, in such a way as not to be incompatible with the agricultural use of the land." Therefore, the FEIR should also discuss any proposed general plan designation or zoning within agricultural preserves affected by the project.

S-005-008

Thank you for giving us the opportunity to comment on this DEIR. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Elliott Lum, Environmental Planner, at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 324-0869.

Sincerely,



Dennis J. O'Bryant  
Program Manager

cc: State Clearinghouse

Placer County Resource Conservation District  
251 Auburn Ravine, Suite 107  
Auburn, CA 95603-3719

detail requested by the commenter is not required at the Tier 1 level of analysis.

#### S-005-006

As discussed on page 1-1 of the Draft Tier 1 EIS/EIR, the action being considered for this Tier 1 analysis is selection of a corridor to be preserved. The proposed action has no physical environmental impacts unto itself, nor would it establish a specific roadway alignment or design. Preservation of a corridor would not necessitate the immediate cancellation of any Williamson Act contracted land. As such there are no findings pursuant to Government Code Section 51282 in the Draft Tier 1 EIS/EIR or in this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

As a specific roadway alignment and design has not been identified, there is not enough information available to provide a "project-level" analysis of the potential impacts to Williamson Act contracted land. As a result, the analysis of potential impacts to land under Williamson Act contract is necessarily limited. If a corridor is selected and preserved in the Tier 1 stage, a subsequent Tier 2 analysis will evaluate the Parkway itself. That is, the specific roadway footprint within the selected corridor will be discussed in detail, including construction and operation of the roadway, as well as any potential conflicts with Williamson Act contracted land that may necessitate cancellation or non-renewal.

The regulatory noticing requirements of Williamson Act contract cancellation are listed in Section 4.4.1.2, State Regulations, on pages 4.4-1 and 4.4-2 of the Draft Tier 1 EIS/EIR.

#### S-005-007

As noted in response to Comment S-005-006, the objective of the Tier 1 project is corridor preservation. The proposed action would not result in physical environmental impacts; would not change any of the existing

land uses; would not require a City or local agency formation commission annexation; and would not necessitate the immediate cancellation of any Williamson Act contracted land. As a result, no compatibility standards identified in Government Code Sections 52328 through 51238.3 or findings pursuant to Government Code Section 51282 are discussed in the Draft Tier 1 EIS/EIR. The information provided by the commenter will be useful in the Tier 2 environmental process.

**S-005-008**

Section 4.1 of the Draft Tier 1 EIS/EIR analyzes the project's potential impacts on current land use as well as conflicts with the existing general plan and zoning designations. Figures 4.1-2 and 4.1-3 display the existing land use designations and applicable zoning of all properties in the study area. Furthermore, the Draft Tier 1 EIS/EIR evaluates the project's potential impacts by comparing the impacts to the evaluation criteria identified in Section 4.1.3.2. The evaluation of land use impacts includes an analysis of the project's potential to convert substantial amounts of agricultural land; bisect parcels; be compatible with adjacent and proposed land uses; be consistent with zoning acreage requirements; and be consistent with general plan and other applicable plans and policies as identified in Section 4.1.3.3 of the Draft Tier 1 EIS/EIR.

August 17, 2007

Placer County Transportation Planning Agency  
 Celia McAdam, Executive Director  
 299 Nevada Street  
 Auburn, CA 954603

Subject: Placer Parkway Corridor Preservation, Tier 1 Environmental Impact Statement/  
 Program Environmental Impact Report (EIS/EIR)

Dear Ms. McAdam:

Thank you for providing a copy of the above referenced document. We appreciate the opportunity to review the proposed project early in the planning process and offer the following comments:

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T-001-001

1. There is no indication that the proposed Thunder Valley Casino expansion project was considered in the Tier 1 analysis. The Notice of Preparation regarding the Tribal Environmental Impact Report (TEIR) for the proposed expansion project was released on June 15, 2007. The TEIR will include an analysis of potential impacts to the regional transportation system and any required mitigation measures. The NOP is available at: <http://www.analyticalcorp.com>.

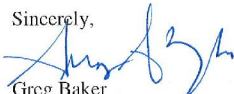
T-001-002

2. It should be noted that the newly constructed Foothills Boulevard North is now open and is a key access road to Thunder Valley Casino. The figures in the Tier 1 EIS/EIR do not include Foothills Boulevard North.

T-001-003

3. None of the alternatives included in the Tier 1 analysis would impact known prehistoric archaeological sites. We understand that more extensive investigations will be carried out for the Tier 2 analysis and we would like to be notified if prehistoric resources are located.

Once again, thank you for the opportunity to comment. Please contact Shelley McGinnis, Analytical Environmental Services, at (916) 447-3479 with any questions or comments.

Sincerely,  
  
 Greg Baker  
 Tribal Administrator

**T-001-001**

Thunder Valley Casino is outside of the Parkway study area but is within the Transportation Analysis Study Area (TASA) and Analysis Focus Area (AFA), as described in Section 4.8, Figure 4.8-1, of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. The proposed expansion of the Casino was not evaluated as a specific major project within the Parkway cumulative impacts analysis, as the expansion was not a proposed project at the time of preparation of the Draft Tier 1 EIS/EIR (the Notice of Preparation for the expansion was released less than two weeks before the Draft Tier 1 EIS/EIR was published on June 29, 2007). However, the Parkway cumulative development scenario (Section 3.4.1 of the Draft Tier 1 EIS/EIR) does include future development assumptions for retail and employment growth in the current General Plan areas of Placer County, which would include Thunder Valley Casino.

**T-001-002**

The commenter states that Foothills Boulevard North is now open. This comment is noted. The Draft Tier 1 EIS/EIR considered this roadway in the conceptual placement of the first interchange west of the State Route 65 interchange, which is located where Foothills Boulevard North currently lies.

**T-001-003**

Placer County Transportation Planning Agency or the California Environmental Quality Act lead agency for Tier 2 studies will notify the commenter with respect to cultural resources investigations at the Tier 2 stage of the environmental process.



**3.3 COMMENTS ON THE PARTIALLY REVISED DRAFT TIER 1 EIS/EIR, AND  
RESPONSES (PAGES 201 THROUGH 367)**

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March 15, 2009

Ms. Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

**Re: Comments of Placer Athens, L.P. on the Placer Parkway  
Corridor Preservation Project Partially Revised Draft Tier 1  
EIS/Program EIR (January 2009)**

Dear Ms. McAdam,

This office represents Placer Athens, L.P., and on behalf of our clients we submit these comments on the Placer Parkway Corridor Preservation Project Partially Revised Draft Tier 1 EIS/Program EIR ("Partially Revised Draft EIS/EIR").

Our clients are the owners of approximately 318.5 acres of land in unincorporated Placer County located south of Athens Avenue and east of Fiddymont Road (the Subject Property). The Subject Property is comprised of two parcels, designated as Assessor's Parcel Numbers 017-061-095 (Parcel 1) and 017-061-096 (Parcel 2), which were created through the approval of Parcel Map T20060525 by the County of Placer on January 24, 2007. Both parcels are within the area subject to the County's Sunset Industrial Area Plan (SIAP), and are designated for industrial use by the SIAP.

As shown in the Partially Revised Draft EIS/EIR, Parcel 2 would be impacted by the proposed alignment of the Placer Parkway. We are concerned not only about the direct take of our client's property for this facility, but also about the proposed "no-development buffer zone" that would have far greater impacts on the use and valuation of this property. The document identifies a 500 foot-wide corridor along the section of the Placer Parkway (east of Fiddymont Road) that would impact the Subject Property.

Section 1.2.4 of the Partially Revised Draft EIS/EIR describes the intent of the "no-development buffer zone" is to further a "parkway" concept by:

- maintaining a visual open space concept and encouraging linkages to

## **B-009-001**

Please see Master Response 1, which discusses the no-development buffer zone. The commenter expresses concern that his client's property would be affected by the buffer zone, even though it is in a designated industrial zone (Sunset Industrial Area Plan). It is precisely for this reason that the language quoted by the commenter regarding adjustment of the no-development buffer zone is included in the project description. Depending on where within the corridor the actual roadway would be located, the impact on this property could be less than depicted within the 500-foot-wide corridor, and depending on the use of the property adjoining the Parkway, the buffer could be reduced if allowed by the performance standards as described in the Placer Parkway Draft Corridor Preservation Tier 1 EIS/EIR. It is also possible that the land outside of the Parkway right-of-way but within the buffer could be retained by the owner, with an easement prohibiting access to the Parkway.

**B-009-001**

**B-009-001**

other open spaces along the corridor;

- preserving open space and agricultural uses adjacent to the Parkway;
- providing opportunities to preserve biological resources along the corridor; and
- limiting future development along the Parkway from encroaching to the facility's edge by maintaining it as a zone where development is either not permitted or is severely restricted.

Simply, it makes no sense from a land planning standpoint to pretend that the future use of the adjacent property will be for open space and agricultural land preservation, or to justify the "no-development buffer zone" concept on these grounds. This particularly true where the underlying property is designated for industrial development in a rapidly urbanizing portion of Placer County. Section 1.2.4 of the Partially Revised Draft EIS/EIR further states that:

It is intended that the no-development buffer zones would be owned and managed in the future to achieve these objectives. Since the value of the no-development buffer zones to maintain the parkway concept and limit access depends to some extent on the adjacent land uses, 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.

**B-009-002**

The lead agencies should recognize that our clients have no intention to "own and manage" property within the "no-development buffer zone." They are not in the primary business of landscape maintenance. Pages 2-10 to 2-11 of the 2007 Draft EIS/EIR state that:

"Landscaping will be installed within the Parkway's "buffer areas," i.e., the portions of the 500- and 1,000-foot-wide corridors not used as part of the roadway cross section, as well as within the median. Landscaped buffer areas will incorporate fire-retardant low-maintenance plantings that are compatible with and may enhance the variety of existing landscape features in the study area such as Pleasant Grove Creek and vistas of the Sierra Foothills."

**B-009-003**

The Partially Revised Draft EIS/EIR must recognize that a taking of property rights of the extent envisioned by the "no-development buffer zone" would create the basis for inverse condemnation, unless it proposed by the lead agencies to acquire fee title at fair market value to the affected properties. As with the 2007 Draft EIS/EIR before it, the Partially Revised Draft EIS/EIR fails to

### **B-009-002**

It is acknowledged that not all property owners would interact with the no-development buffer in similar ways. Some farmers, for instance, could elect to continue farming operations within the buffer, in which case they would continue to maintain the property within the buffer area. Some developers may elect to incorporate open space or other passive recreation within the buffer area as an amenity for their projects, in which case they would also continue to maintain the property within the buffer area. In portions of the buffer maintained as open space through an easement, the property owner could have the option to continue existing uses, or to have the County purchase the property and be responsible for maintenance. Landscaping would occur within the right-of-way, including potentially on County-owned portions of the buffer.

### **B-009-003**

Section 4.2.4 addresses strategies to mitigate impacts resulting from displacement, including preparation of a Relocation Impact Report that would evaluate the impacts and relocation of affected homes and businesses. The project would comply with the Uniform Relocation and Real Property Acquisition Assistance Act. Section 2.2.6 of the Draft Tier 1 EIS/EIR presents a preliminary cost estimate for the Parkway, including right-of-way acquisition. Please also see responses to Comments I-044-001 and I-044-002.

B-009-003

adequately address this issue, or to even explore whether the buffer zone is a feasible concept from a cost perspective when the cost of acquisition is considered. We observe that of the 500-foot corridor, only approximately 112 feet would be devoted to the pavement section (6 12-foot travel lanes and 4 10-foot shoulders). Even allowing for a landscaped center median rather than concrete railing, it is obvious that the concept of the "no-development buffer zone" represents a tremendous cost-escalator to this public project that neither the taxpayer nor private development should be obligated to fund.

B-009-004

Given that a 500 to 1,000-foot wide corridor is not necessary for a six-lane freeway facility, we would question whether SPRTA or Caltrans could make the legal findings in support of a Resolution of Necessity<sup>1</sup> to condemn the right-of-way in question. Public necessity demands that three elements be satisfied before the power of eminent domain can be exercised:

1. The public interest and necessity require the project (Code of Civil Procedure §1240.030(a));
2. The project is planned or located in the manner that will be most compatible with the greatest public good and least private injury (Code of Civil Procedure §1240.030(b)); and
3. The property sought to be acquired is necessary for the project (Code of Civil Procedure §1240.030(c))

While we do not dispute that "public interest and necessity" support a freeway corridor connecting State Route 65 with State Route 70/99 through western Placer County, it seems clear that the Placer Parkway as presently conceived would hardly represent the "least private injury" compared to a project without the extensive buffers identified in the Partially Revised Draft EIS/EIR.

B-009-005

When Parcel Map T20060525 was approved by the County of Placer in 2007, the following Advisory Note was listed in the Conditions of Approval:

*ADVISORY NOTE: This property is within the alignment of the proposed Placer Parkway corridor, a regional transportation facility currently being analyzed by the Placer County Transportation Planning Agency (PCTPA) in preparation of a Tier I EIS/EIR environmental document. Future land division of this property (namely Parcel 2) will be required to dedicate as much as 500 feet along the length of the southern property line and the portion of the southeast corner of this parcel for a Foothills Boulevard/ Placer Parkway interchange. At a minimum, any development proposals for Parcel 2 will be reviewed by Placer County and the PCTPA in an effort to minimize structural, physical, and/or access conflicts that may impact the future Placer Parkway alignment.*

<sup>1</sup> See Code of Civil Procedure §1245.250.

**B-009-004**

The reasons for the no-development buffer are identified in the Draft Tier 1 EIS/EIR (please see Section 2.2.4.1). The commenter has already identified the language in the Draft Tier 1 EIS/EIR that anticipates that some adjustments may be made in areas undergoing urban development, and this would be applied on a case-by-case basis. To the extent that any acquisition must proceed by condemnation, the findings in support of any particular Resolution of Necessity would be made at the time of the hearing on the Resolution and presumably would take into consideration the information about the need for the no-development buffer that is identified in the Draft Tier 1 EIS/EIR, along with other information pertinent at the time of the required findings.

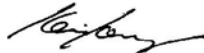
**B-009-005**

The commenter states that the project proponent should not expect that right-of-way for the Parkway will be secured through dedication. Whether any dedication requirement arises for any particular property or development, and the extent of any such dedication, can be expected to depend upon the type and intensity of use proposed for any particular property and upon the findings and determinations of the land use and other regulatory authorities with responsibility for approving any particular project.

We recognize that this Advisory Note was identified by the County of Placer, and not by SPRTA, Caltrans, or the FHA. However, we wish to make the lead agencies for the Placer Parkway project aware that they should not expect that right-of-way will be secured through dedication in the manner described in the Advisory Note above. In order for a dedication of land for public use to survive constitutional muster, requirements of "nexus" and "proportionality" must be satisfied. See *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994). In other words, the required dedication of land must be related both in nature and extent to the impact of the proposed land use approval being conditioned. The simple division of acreage through a parcel map does not contribute to the need for the Placer Parkway to any greater degree than similar property not located within the proposed alignment. The requirement for dedication identified in the Advisory Note does not meet constitutional requirements, and should not be considered by the lead agency as a lawful means of reducing project cost.<sup>2</sup> New development within the SIAP will be required to pay the recently adopted Tier II development fee, which will provide an estimated \$475 million in funding for the Placer Parkway project, including funds for right-of-way acquisition.

On behalf of our clients, we appreciate the opportunity to provide comment on the Partially Revised Draft EIS/EIR, and to participate in the planning process for this project.

Very truly yours,



Kevin Kemper

---

<sup>2</sup> We further caution that the restraints on site development identified in the Advisory Note have the potential to result in a cause of action for pre-condemnation damages. See, e.g. *Jones v. People ex. rel. Department of Transportation*, 22 Cal.3d 144 (1978)(damages awarded due to agency refusal to approve subdivision with access through a proposed freeway route).



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March 16, 2009

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ORIGINAL VIA U.S. MAIL

Celia McAdam  
Executive Director  
PCTPA  
299 Nevada Street  
Auburn, CA 95603

**RE: Comments on Placer Parkway Corridor Preservation Partially Revised Tier 1 Environmental Impact Statement/Program Environmental Impact Report**

Dear Ms. McAdam:

This firm represents Placer 2780, LP, which owns real property located in South Placer County ("Placer 2780"). Placer 2780 is pleased to submit these comments on the above-referenced Draft EIR/EIS.

**B-010-001**

We agree with the conclusions set forth in revised Section 5.19.4 that Alternative 5 is the Environmentally Superior Alternative under both CEQA and NEPA analysis. As you know, the Alternatives Analysis is an extremely important part of any EIR/EIS from the standpoint of determining the most environmentally appropriate project. The Council on Environmental Quality, which promulgates regulations implementing NEPA, has described the Alternatives requirement as the "heart" of an EIS (40 CFR 1502.14).

**B-010-002**

While as stated above, we agree with the conclusions set forth in Section 5.19.4, we do believe the Alternatives Analysis has failed to discuss some critical facts which further support the selection of Alternative 5 as the Environmentally Superior Alternative.

First, the Alternatives Analysis does not clearly recognize the fact that Placer County has approved the Regional University Specific Plan, and that implementation of either Alternative 1 or Alternative 2 would destroy the integrity of such Specific Plan. In particular, the Regional University Specific Plan was designed as a "smart growth", and pedestrian oriented community supportive of the SACOG Blueprint Plan. Implementation of either Alternative 1 or Alternative 2 would significantly disrupt the planning principles associated with this plan and call into question the feasibility of the entire plan. As well documented during the public hearings on the

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**B-010-001**

The commenter expresses agreement with the conclusion in the Placer Parkway Partially Revised Draft Tier 1 EIS/EIR that Alternative 5 is the Environmentally Superior Alternative under CEQA. This comment is noted.

**B-010-002**

The alternatives analysis evaluated all alternatives based on existing conditions in the study area at the time the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR was prepared. Those existing conditions did not include an approved Regional University Specific Plan although representatives from Regional University Specific Plan did participate in the Study Advisory Committee for the project. Please see the second paragraph of response to Comment B-001-002. The cumulative analysis recognized the potential for an approved Regional University Specific Plan for purposes of projecting population and employment, while conservatively ascribing all impacts within the corridor alignment alternatives to the Parkway. It is correct that Sutter County has expressed a preference for an alignment connecting to State Route 70/99 at Sankey Road (please see Comment Letter L-019).

Celia McAdam  
March 16, 2009  
Page 2

B-010-002

Regional University Specific Plan, in addition to the many cultural and educational benefits to our community, state, and nation, the proposed four-year university, located within the Regional University Specific Plan, has the potential to bring significant economic development benefits to South Placer County and the region in general. Accordingly, implementation of either Alternative 1 or Alternative 2 would appear to directly hinder the achievement of one of Placer Parkway's principal purposes which is to "advance economic development goals in South Sutter County and South Western Placer County."

Second, based upon comments you have already received from Sutter County, Alternatives 1, 2, and 3 would significantly disrupt planned residential communities in South Sutter County (the so-called "Sutter Pointe" project). Conversely, selection of either Alternative 4 or Alternative 5 would significantly promote economic development in Sutter County as the proposed Placer Parkway would be aligned through an area of the Sutter Pointe Plan which is planned for uses which promote economic development. Accordingly, Alternatives 4 or 5 promote one of the principal purposes of the project.

The Final EIR/EIS should recognize the above-stated facts.

B-010-003

Again, based upon the discussion in the Partially Revised Draft Tier 1 EIS/EIR and the comments set forth above, Alternative 5 appears to be the clear Environmentally Superior Alternative. Thank you for this opportunity to comment.

Very truly yours,

HEFNER, STARK & MAROIS, LLP

By 

Timothy D. Taron

TDT:dan  
cc: Placer 2780

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**B-010-003**

Please see response to Comment B-010-001.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

March 13, 2009

Walter Waidelich, Administrator  
California Division  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
Sacramento, CA 95814

Subject: Draft Partially Revised Tier 1 Environmental Impact  
Statement/Environmental Impact Report for the Placer Parkway Corridor  
Preservation Project (CEQ #20070278)

Dear Mr. Waidelich:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document. Our enclosed detailed comments were prepared pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act.

This project is following the NEPA/Clean Water Act Section 404 Integration Process MOU (NEPA/404 MOU, enclosed), as modified for Tier 1 projects, so that decisions made in Tier 1 are consistent with the requirements of Clean Water Act (CWA) Section 404 permitting at the end of the Tier 2 process. Resolution of conflicts during the Tier 1 process will streamline the Tier 2 environmental review and permitting process. We commend the Federal Highway Administration (FHWA), the California Department of Transportation (Caltrans), and the South Placer Country Regional Transportation Authority (SPRTA) for engaging in this collaborative approach at Tier 1 and for your responsiveness to EPA's input throughout the NEPA/404 MOU process.

We previously provided comments on the Draft Environmental Impact Statement (DEIS) on September 25, 2007 (see attached). EPA's major area of concern with the DEIS was the lack of a quantitative analysis of the indirect impacts of the proposed project, including potential induced growth impacts to aquatic resources, special status species, and biological habitat. The DEIS concluded that the project will be growth inducing. We commend FHWA for the recognition of indirect impacts, particularly growth inducement, as a major issue for the project, and for the analysis of induced growth in the Partially

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**F-004-001**

The commenter references the U.S. Environmental Protection Agency's (U.S. EPA) previous comment letter on the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, a copy of which is attached as Comment F-004-036. This comment is noted.

F-004-001

Revised DEIS. Additionally, we support FHWA's objective to avoid unplanned growth in environmentally sensitive areas.

F-004-002

While the Partially Revised DEIS includes a more robust analysis of induced growth impacts; EPA disagrees with some of the analysis assumptions and conclusions. First, we do not agree that potential induced growth impacts of the alternatives would be limited to within one mile of the roadway and potential interchanges. Some of the alternatives could have impacts at greater distances after Placer Parkway provides high-speed transportation access to southern Sutter County and southwestern Placer County, areas under intense growth pressure. Second, land within the 100-year floodplain should be considered "developable" within the analysis, because the 100-year floodplain has been extensively developed in the Sacramento Metropolitan Area historically and more development in the 100-year floodplain is planned in the future around the proposed Placer Parkway. Although development in the floodplain is discouraged, recent and historical development within floodplains has in fact occurred and continuation of these patterns is reasonably foreseeable.

F-004-003

F-004-004

EPA's continuing concerns with anticipated indirect effects as described above are further described in the enclosed detailed comments. These concerns, as well as impacts to air quality and hydrology, as discussed in our previous comment letter on the DEIS, are the basis for our rating of this Partially Revised DEIS as "Environmental Concerns-Insufficient Information (EC-2)". Please see the enclosed Summary of EPA Rating Definitions for a description of this rating. Responses to EPA's comments concerning air quality and hydrology were not discussed in this Partially Revised DEIS, so we have attached our September 25, 2007 DEIS comment letter to facilitate responses to these issues in the Final EIS.

F-004-005

Since publication of the DEIS and EPA's subsequent comments on that document, the NEPA/404 agencies have participated in a number of meetings to discuss the corridor most likely to contain the least environmentally damaging practicable alternative (LEDPA), the only alternative that can be permitted under the CWA Section 404. EPA and SPRTA staff members have scheduled a meeting for April 17, 2009 to continue working towards resolving the current disagreement regarding the corridor most likely to contain the LEDPA, as decided by agency management in the January 23, 2009 dispute resolution meeting. We look forward to the upcoming meeting as an opportunity to resolve the disagreement regarding the LEDPA now, and to avoid the need to resurface unresolved issues during the future Tier 2 environmental and permitting process. As stated in the NEPA/404 MOU, "If the lead agency chooses to eliminate in Tier 1 any alternative(s) likely to contain the LEDPA, there is a risk that the eliminated alternative(s) may need to be revisited in Tier 2."

We appreciate the opportunity to review this Partially Revised DEIS. Please feel free to call me at 415-972-3843 to further discuss the concerns raised in the enclosed detailed comments. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). Carolyn Mulvihill of my office (415-947-

## F-004-002

Section 2.3 of Appendix G of the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD) presents the rationale for the selection of a one-mile analysis limit for the additional analysis of growth and fragmentation effects associated with hypothetical changes to the project, including the elimination of the no-development buffer zone and inclusion of hypothetical interchanges that are not part of the project. The one-mile limit reflects National Cooperative Highway Research Program guidance for evaluating development effects associated with a freeway interchange. The limit was primarily intended to allow differentiation among alternatives by limiting the amount of overlap of the analysis areas of each alternative (as shown in Figure G-5), and the request by the U.S. EPA to provide more quantitative differentiation among alternatives.

It should be noted that the analysis of secondary and indirect impacts for the Parkway was not limited to a one-mile area around each alternative, used in the PRD to analyze hypothetical project changes, but was based on an expansive study area as illustrated in Figure 3-1 of the Draft Tier 1 EIS/EIR and Figure G-1 of the PRD. The Draft Tier 1 EIS/EIR also included a comprehensive analysis of potential growth inducement, as discussed in Section 6.1. As well as using four widely accepted qualitative growth assessment methods, this analysis also included a comprehensive quantitative assessment of growth using the MEPLAN integrated land use and transportation model, as described in Section 6.1.3.3 of the Draft Tier 1 EIS/EIR. This model, which is used and approved by the Sacramento Area Council of Governments (SACOG) and use of which was supported by the resource agencies, evaluated potential effects of the Parkway on population and employment over a six-county region, including Sutter County.

## F-004-003

It is acknowledged that much of the historical development in the

3554; mulvihill.carolyn@epa.gov), and Erin Foresman of our Wetlands office (916-557-5253; foresman.erin@epa.gov) will continue to be available to coordinate with your staff in addressing our concerns.

Sincerely,



Enrique Manzanilla, Director  
Communities and Ecosystems Division

Enclosures:

Summary of EPA Rating Definitions  
NEPA/404 Agreement for Placer Parkway  
EPA's Detailed Comments  
EPA's September 25, 2007 DEIS Comment Letter

cc: Celia McAdam, South Placer Regional Transportation Authority  
Katrina Pierce, California Department of Transportation  
Nancy Haley, U.S. Army Corps of Engineers  
Ken Sanchez, U.S. Fish and Wildlife Service  
John Baker, National Marine Fisheries Service  
Jeff Finn, California Department of Fish and Game  
Mike McKeever, Sacramento Area Council of Governments  
Loren Clark, Placer County Planning Department

Sacramento Metropolitan Area has occurred in the 100-year floodplain, and that new development is proposed in the 100-year floodplain in south Sutter County; however, the transportation agencies (Federal Highway Administration, California Department of Transportation, South Placer Regional Transportation Authority) do not agree with the assertion that development of the entire 100-year floodplain in the project study area is therefore "reasonably foreseeable" within the study period. Approximately half of all the floodplain acreage in question lies within the Natomas Basin, where robust agreements are in place to control future development. The reference to more floodplain development "planned in the future around the proposed Placer Parkway" may refer to the recently approved Sutter Pointe development, which was proposed without consideration as to whether or not the Placer Parkway would be built, and which will use all of the development acreage permitted in the Sutter County portion of the Natomas Basin under the National Basin Habitat Conservation Plan (NBHCP). Therefore, no additional development is reasonably foreseeable in floodplains within the Natomas Basin portion of the study area, because, in addition to other development constraints described in the memorandum, Development Restrictions in Floodplains," updated April 15, 2009, attached at the end of this Comment Letter and responses, any such proposed development would trigger reevaluation or amendment of the NBHCP. Reasons why additional development in other floodplain portions of the study area is not considered to be reasonably foreseeable are also described in this attachment.

In addition, please see response to Comment L-014-014, which refers to a comment letter submitted on the PRD from Placer County, which emphasizes the county's position against development in the floodplain, and confirms the county's commitment to enforce its goals and policies against such development.

## SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### ADEQUACY OF THE IMPACT STATEMENT

#### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

### F-004-004

The commenter's detailed comments are responded to below. For responses to the commenter's previous letter (dated September 25, 2007) related to air quality and hydrology, please see responses to Comments F-002-017 and F-002-016, respectively.

### F-004-005

Comment noted. The federal resource agencies have agreed that Alternative 5 with a no-access buffer is the corridor most likely to contain the LEDPA. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

#### NEPA/404 INTEGRATION PROCESS HISTORY

In 2004 the Federal Highway Administration (FHWA), California Department of Transportation (Caltrans), the Placer County Transportation Planning Agency (on behalf of the South Placer Regional Transportation Authority [SPRTA]), U.S. Army Corps of Engineers (Corps), and U.S. Environmental Protection Agency (EPA) agreed to follow a National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU) – modified for Tier 1 decision making – as the framework to guide the environmental review of the programmatic, Tier 1 Placer Parkway project (Parkway).<sup>1</sup> The goal of the modified NEPA/404 MOU process is to ensure that Tier 1 decisions reflect careful consideration of the Clean Water Act (CWA) Section 404 (b)(1) Guidelines (Guidelines), to eliminate the need to revisit decisions at the Tier 2 project-level analysis that might conflict with CWA Section 404 permit requirements. Resolution of conflicts during the Tier 1 process will streamline the Tier 2 environmental review and permitting process.

Since 2004, EPA and the Corps have been working with SPRTA, Caltrans, and FHWA through the NEPA/404 MOU process. The agencies successfully completed the first three concurrence points in the environmental review process: Purpose and Need, Selection Criteria, and Range of Alternatives to be evaluated in the Environmental Impact Statement (EIS). The next steps in the modified NEPA/404 MOU process are the following: 1) select the corridor(s) most likely to contain the “least environmentally damaging practicable alternative (LEDPA),” the only alternative that can be permitted under CWA Section 404, and 2) determine the general mitigation framework for the project.

Since the Guidelines require consideration of direct, secondary (indirect), and cumulative impacts when determining the LEDPA, EPA’s comments on the Draft Environmental Impact Statement (DEIS) included a recommendation that FHWA perform a quantitative analysis of indirect impacts, including growth inducement and habitat fragmentation, and cumulative impacts. In response to EPA’s comments on the DEIS, on June 24, 2008, FHWA submitted additional induced growth, habitat fragmentation, and cumulative impacts analyses and requested EPA and Corps concurrence that the Alternative 5 corridor is most likely to contain the LEDPA.

#### Corridor Most Likely to Contain the LEDPA

EPA, the Corps, and the U.S. Fish and Wildlife Service (USFWS), consider the Alternative 1 corridor most likely to contain the LEDPA because it minimizes the potential for aquatic resource impacts from urban development and fragmentation facilitated by the Parkway.<sup>2</sup> The proposed Parkway is a new freeway that crosses thousands of acres of undeveloped land to connect two major highways, State Route 99/70 and State Route 65. The new Parkway would provide express

<sup>1</sup> Modified NEPA/404 MOU Integration Process for the Tier 1 Placer Parkway Corridor Preservation Project, April 12, 2004.

<sup>2</sup> USFWS and California Department of Fish & Game (CDFG) letter to SPRTA, September 4, 2007; EPA Region 9 letter to FHWA, September 25, 2007; and EPA and Army Corps of Engineers letter to FHWA, August 14, 2008.

#### F-004-006

The results of the analysis presented in the Draft Tier 1 EIS/EIR, and the PRD, as revised and shown in Chapter 4, do not support Alternative 1 as the corridor most likely to contain the LEDPA. At best, these documents support the Draft Tier 1 EIS/EIR conclusion that, “It is unlikely that the choice of one Placer Parkway corridor alignment alternative over another would substantially change expected patterns of growth and development in the study area and surrounding region.” The qualitative and quantitative analyses contained in Section 6.1 of the Draft Tier 1 EIS/EIR provide substantial support for this conclusion. The PRD, using assumptions about project components not proposed by the transportation agencies, concludes that the maximum potential difference among alternatives would be a total of 17 acres of developable land (PRD Section 3; Final Tier 1 EIS/EIR, Chapter 4). Furthermore, this analysis shows that, should this entire area be developed, the impacts to wetlands and vernal pools within this study area are substantially greater under Alternative 1 than under Alternative 5 (please see Table G-7 in the PRD, as revised, in Chapter 4). The commenter has not provided any evidence to refute these conclusions.

With respect to the commenter’s footnote 3, page 6-1 of the Draft Tier 1 EIS/EIR describes the two most pertinent guidance documents related to the growth-inducement analysis. The first is the California Department of Transportation (Caltrans) Community Impact Assessment, Environmental Handbook, Volume 4, (Caltrans, 1997). The second is the *Guidance for Preparers of Growth-Related, Indirect Impact Analyses* (Mare Island Accord, 2006) referenced by the commenter. Please also see page B-4 of Appendix B of the Placer Parkway Community Impact Assessment (CIA), which provides a literature review of not only two of the documents referenced by the commenter, but eight others as well. “[T]he results of the literature review are that there is no single cause and effect relationship between a transportation improvement and growth and thus no feasible way to predict such growth inducing effects

F-004-006

transportation access to a peninsula of undeveloped land under considerable growth pressure, bordered by the expanding urban footprint of the City of Roseville and other urbanizing areas in Placer and Sutter Counties.<sup>3</sup> The new Parkway would fragment the existing undeveloped landscape, including aquatic resources and wildlife habitat, by severing habitat connectivity and introducing a 14 to 16 mile high-speed transportation barrier to wildlife movement.

F-004-007

**The area of undeveloped land surrounded by growth pressure, which would be accessed by a new freeway, increases with distance north of Baseline Road.** The further north the Parkway is located, greater amounts of land and aquatic resources will be vulnerable to impacts from conversion of farmland and open space to urban uses. Areas south of the ultimate Parkway alternative will be particularly vulnerable to induced growth impacts because the land south of the Parkway will be surrounded on four sides by: 1) growth pressure from the Parkway, 2) expanding Placer County cities and unincorporated areas, and 3) Sutter County development. Growth pressure will exist north of the proposed Parkway alternatives, as a result of building the Parkway, but that growth pressure may be significantly less intense as development would not be surrounding the area on all sides, as it is in the area south of the alternatives.

F-004-008

**The potential indirect aquatic resource impacts associated with development facilitated by the Parkway are considerably greater than the direct impacts associated with construction of the Parkway.** The DEIS states that Alternative 1 would potentially impact 16 streams, 26 acres of wetlands and 123 acres of vernal pool complexes (including uplands). Alternative 5 would potentially impact 10 stream crossings, 28 acres of wetlands, and 124 acres of vernal pool complexes. Local planning information as well as state and federal environmental documents<sup>4</sup> identify approximately 12,000 acres of proposed urban development near Placer Parkway, with at least 210 acres of proposed impacts to aquatic resources including wetlands. In addition, there are hundreds of acres of vernal pool complexes on lands near the proposed Parkway alternatives that do not have current proposals for development but would be under growth pressure due to their proximity to urban areas and Placer Parkway. This information indicates that indirect impacts to aquatic resources from induced growth could be at least five times greater than direct impacts associated with construction of Placer Parkway<sup>5</sup>.

F-004-009

**EPA considers Alternative 5 to have greater potential to contribute to aquatic resource impacts from urbanization than Alternative 1 because there are more aquatic resources vulnerable to destruction from induced growth impacts associated with Alternative 5.** Alternative 5 provides new, high-speed transportation access at the furthest distance from planned and existing development, in a relatively small area, and places greater amounts of land and aquatic

<sup>3</sup> For information on how the location of a transportation facility can influence and direct growth, see Chapter 5, *Guidance for Preparers of Growth-related, Indirect Impact Analyses*; National Cooperative Highway Research Program (NCHRP) Report 423A, *Land Use Impacts of Transportation: A Guidebook*; and NCHRP Report 466, *Desk Reference for Estimating the Indirect Effect of Proposed Transportation Projects*.

<sup>4</sup> Local planning information includes general plans and geographic information systems files; state environmental documents include Environmental Impact Reports; and federal environmental documents include Clean Water Act Section 404 permit applications and pre-application materials.

<sup>5</sup> Vernal pool complexes include upland areas. Assuming 10% density of wetted acres within the complexes, Alternatives 1 and 5 would directly impact about 12 acres of vernal pools. Adding wetland impacts to wetted acre vernal pool impacts results in estimated direct impacts to aquatic resources ranging between 38 and 40 acres. The 210 acres of proposed indirect impacts to aquatic resources (from surrounding potential projects) is five times greater than the estimated 40 acres of direct impacts resulting from construction of the Parkway.

based on the results of other studies and other transportation improvements.” The growth-inducing effects of transportation improvements can best be understood in the context of local conditions and factors that influence growth.”

Habitat fragmentation impacts of the Parkway are discussed in Section 4.14.3.4 of the Draft Tier 1 EIS/EIR, which concludes that all of the Parkway build alternatives would have habitat fragmentation effects and that there would be very limited differences among alternatives. In addition, Alternative 1 is 16.2 miles long, which makes it the longest of all the alternatives (Alternatives 4 and 5 are 14.3 and 14.2 miles long, respectively), with direct fragmentation effects over a longer distance. Alternative 1 also includes more than 50 percent more stream crossings than Alternative 5, including a 7,000-foot longitudinal crossing of Steelhead Creek. For these reasons it was concluded that Alternative 1 would have the greatest direct fragmentation effects. Please also see response to Comment F-002-012.

Additional analysis of fragmentation effects contained in the PRD, including the elimination of the no-development buffer zone and inclusion of hypothetical interchanges (neither of which is proposed by the transportation agencies) again found that there was very little difference in the potential indirect fragmentation effects of the Parkway build alternatives (please see PRD pages G-73 through G-79).

The federal resource agencies have agreed that Alternative 5 with a no-access buffer is the corridor most likely to contain the LEDPA.

**F-004-007**

The analyses of growth inducement presented in the Draft Tier 1 EIS/EIR do not support the commenter’s assertion that growth pressure in the study area increases the farther north that the Parkway is located. The Draft Tier 1 EIS/EIR includes a comprehensive analysis of potential

F-004-009

resources under intense growth pressure than Alternative 1. Undeveloped lands and aquatic resources south of the Placer Parkway alternatives are especially vulnerable to induced growth impacts because they would be surrounded on four sides by intense growth pressure from expanding urban development, associated infrastructure, and construction of Placer Parkway. There are 6,355 acres of undeveloped land, without proposed development plans, south of Alternative 5 while there are only 1,574 acres of undeveloped land, without proposed development plans, south of Alternative 1<sup>6</sup>. Similarly, there are approximately 1,000 acres of vernal pool complexes south of Alternative 5 while there are only approximately 215 acres of vernal pool complexes south of Alternative 1. The area between the two alternatives contains approximately 4,800 acres of undeveloped land and 785 acres of vernal pool complexes, which would be vulnerable to development and destruction from impacts induced, in part, by Alternative 5. Alternative 1 is more likely to contain the LEDPA than Alternative 5 because significantly fewer indirect impacts to aquatic resources would result from urban development facilitated, in part, by Placer Parkway.

**EPA and the Corps consider the Parkway Alternative 1 corridor most likely to contain the LEDPA because it minimizes aquatic resource impacts from habitat fragmentation caused by the Parkway.** Lands near the proposed Parkway corridors are a mosaic of agricultural fields, wetlands, vernal pools, streams, and floodplains. These lands work together to provide important wildlife foraging and nesting habitat and migration corridors for endangered and special status upland and aquatic species. Constructing the Parkway would fragment this landscape by creating a six lane, high-speed transportation barrier to wildlife movement and introduce 14 to 16 miles of urban edge along the freeway perimeter. USFWS consider habitat fragmentation one of the primary threats, second only to habitat destruction, to the endangered vernal pool fairy shrimp<sup>7</sup>. Locating the Parkway in the Alternative 1 corridor creates one small block of land south of the Parkway and one large block of land north of the Parkway, which maintains the greatest amount of habitat free of large transportation barriers and minimizes edge area impacts on aquatic wildlife and habitat. Potential impacts to wetlands, vernal pools, and aquatic species from fragmentation are substantially greater than direct impacts from constructing the Parkway. Alternative 1 is more likely to contain the LEDPA because it minimizes potential impacts to aquatic resources from habitat fragmentation.

F-004-010

Based on this information, EPA and the Corps responded to FHWA on August 14, 2008, jointly stating we do not concur that Alternative 5 is most likely to contain the LEDPA, and initiated informal dispute resolution. The first dispute resolution meeting was held on October 15, 2008 between management from the Corps, EPA, SPRTA, Caltrans, and FHWA. The Corps and EPA identified potential options for the project to move forward; however SPRTA rejected the proposals and FHWA requested formal agency elevation.

F-004-011

One of the options the Corps and EPA proposed at the October 15, 2008 meeting was a "modified" Alternative 5, in which the resource agencies could potentially concur that Alternative 5 is the corridor most likely to contain the LEDPA if the transportation agencies included avoidance of induced growth impacts as part of the alternative. This could be achieved through acquisition, designation of a conservation easement, or other methods of protection of valuable resource areas in

<sup>6</sup> Calculated using ArcMap 9.3 with satellite imagery (2006), Placer Parkway Alignment Shapefile (received from SPRTA 2008), Placer County vernal pool data (2002), and vernal pool data from CDFG (1997).

<sup>7</sup> USFWS (2005) Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon.

growth inducement, as discussed in Section 6.1. As well as using four widely accepted qualitative growth assessment methods, this analysis also included a comprehensive quantitative assessment of growth using the MEPLAN integrated land use and transportation model, as described in Section 6.1.3.3 of the Draft Tier 1 EIS/EIR. This model, which is used and approved by SACOG and the use of which was supported by the resource agencies, evaluated potential effects of the Parkway on population and employment over a six-county region. The findings of the growth inducement analysis, and the MEPLAN analysis in particular, indicate that there is very little difference between the alternatives with respect to growth inducement, and that Alternative 1 is slightly more growth-inducing than Alternative 5. Please also see response to Comment F-004-019.

The additional analysis of hypothetical project components presented in the PRD also indicates that growth pressure in the study area does not proceed from south to north. Even with the addition of hypothetical interchanges, which the Draft Tier 1 EIS/EIR acknowledges could be a factor in the growth inducement potential of the Parkway (Section 2.2.4), this analysis still confirms that there is little difference among alternatives. Please also see response to Comment F-004-006.

Please also see response to Comment L-014-007, which acknowledges Placer County's observation that growth in the study area has followed an east to west pattern in the past and that such a pattern is likely to continue. Recent actions have confirmed this observation: Placer County has approved the Regional University Specific Plan, and the City of Roseville's processing of applications related to the Creekview and Sierra Vista Specific Plans.

#### F-004-008

The Draft Tier 1 EIS/EIR identified that Alternative 1 would directly impact 15 streams (Table 4.14-5), 35.8 acres of wetland resources

F-004-011

the vicinity of the proposed project. Solutions of this type are supported by Caltrans Guidance: "Purchasing access rights or conservation easements can prevent or minimize growth by limiting land accessibility and can help protect areas containing sensitive resources. Conservation easements also can be established to protect resources in perpetuity"<sup>8</sup>. While the specifics of this proposal, such as the amount of land or methods of protection have not yet been explored, these measures could be determined based on a number of factors, including the amount of valuable habitat area (such as wetlands or vernal pool complexes) between Alternatives 1 and 5, the amount of land in this area not currently planned for development, the proposed Placer County Conservation Plan map, and USFWS Vernal Pool Core Recovery Area.

On January 23, 2009, management from the Corps, EPA, USFWS, SPRTA, Caltrans, and FHWA met for a second dispute resolution meeting. At the end of this meeting, management decided to have staff of the various agencies meet to discuss the specifics of a potential modified Alternative 5. This meeting is scheduled for April 17, 2009.

Following the January 23<sup>rd</sup> meeting, FHWA published the Partially Revised Tier 1 Environmental Impact Statement/Program Environmental Impact Report (RDEIS). This RDEIS includes updates to various sections of the DEIS, including additional induced growth and cumulative impacts analyses requested by EPA in our comments on the DEIS. Our comments below are focused on these analyses.

**RDEIS GROWTH INDUCEMENT ANALYSIS**

F-004-012

In our September 25, 2007 DEIS comment letter, EPA stated the need to compare the direct, indirect, and cumulative impacts of the various alternatives in order to inform the selection of a corridor most likely to contain the LEDPA. We recommended that FHWA prepare a robust qualitative and quantitative analysis of indirect impacts, including habitat fragmentation and growth-related impacts to environmental resources, for each alternative, and provide supporting data. We recommended that FHWA provide a map overlaying aquatic and terrestrial resources and habitat boundaries with areas of existing and anticipated (planned and reasonably-foreseeable) growth. As we stated in our comments, it is important to include indirect, including growth-inducing impacts, in the alternatives analysis, because an alternative with greater indirect impacts, but fewer direct impacts, may be the LEDPA.<sup>9</sup>

F-004-013

We stated that, as the proposed Parkway is a major new freeway in a rural area with abundant aquatic and biological resources, and large areas of functioning habitat, the growth inducement associated with the Parkway will likely have significant adverse impacts to sensitive aquatic and biological resources, including habitat. All proposed Parkway alignments move through a large intact landscape of aquatic and upland habitat. Important natural resources in this landscape include vernal pool grasslands, wetlands, riparian corridors, and stream habitats. These resources provide habitat for federal- and state-listed endangered and threatened species, species of special concern, and other fish and wildlife integral to ecosystem balance and function.

<sup>8</sup> *Guidance for Preparers of Growth-related Indirect Impact Analyses* prepared by Caltrans, EPA, and FHWA. [http://www.dot.ca.gov/seti/Growth-related\\_IndirectImpactAnalysis/gri\\_guidance.htm](http://www.dot.ca.gov/seti/Growth-related_IndirectImpactAnalysis/gri_guidance.htm)

<sup>9</sup> Chapter 2.3, *Guidance for Preparers of Growth-related, Indirect Impact Analyses*. [http://www.dot.ca.gov/seti/Growth-related\\_IndirectImpactAnalysis/gri\\_guidance.htm#cwadef](http://www.dot.ca.gov/seti/Growth-related_IndirectImpactAnalysis/gri_guidance.htm#cwadef)

(Table 4.14-4), and 122.7 acres of vernal pools, including uplands. It identified that Alternative 5 would directly impact 9 streams, 28 acres of wetland resources, and 124 acres of vernal pool resources.

The cumulative impact analysis regarding these resources (Section 4.14.3.5 of the Draft Tier 1 EIS/EIR) evaluates the potential impacts of past, present, and proposed and planned development (as described in Section 3.4.1), and the PRD also included additional quantitative analysis of cumulative impacts on biological resources (please see Section 5 Appendix G of the PRD). Both of these analyses concluded that the Parkway's contribution to cumulative aquatic habitat impacts would be similar among the proposed alternatives, and would be substantive (and "significant" under the California Environmental Quality Act [CEQA]) in the context of historic and future impacts on aquatic resources.

Please see response to Comment F-004-006, first paragraph, which speaks to secondary and indirect impacts associated with growth, including the greater impacts to wetlands and vernal pool complexes under Alternative 1. Please also see Master Response 1, which discusses the hypothetical analyses presented in Appendix G of the PRD and explains recent revisions to these analyses presented as a result of updates to Geographical Information System data provided by Placer County.

**F-004-009**

Please see responses to Comments F-004-007 and F-004-019, which discuss the assertion that growth inducement associated with the Parkway increases with its distance to the north is incorrect. Please see response to Comment F-003-009 regarding habitat fragmentation. Please also see response to Comment F-004-006, which discusses habitat fragmentation associated with the Parkway. Please particularly note the first paragraph with respect to indirect and secondary impacts to



aquatic habitat identified in the PRD. The federal resource agencies have agreed that Alternative 5 with a no-access buffer is the corridor most likely to contain the LEDPA.

F-004-014

We had major concerns about the assumption, used throughout the DEIS, that the “no-development buffer concept” will prevent additional interchanges on and subsequent growth inducement near the Parkway. The DEIS stated that “adjustments” to the buffer could be made at Tier 2 to accommodate “future approved development.” While the growth inducement analysis in the RDEIS assumes additional interchanges not included in the project description, and assumes that the “no-development buffer” would be eliminated, the project description in other sections of the RDEIS still includes this concept. The FEIS should clarify whether the buffer remains an element of the proposed project.

F-004-015

The DEIS concluded that the project will be growth inducing. We commend FHWA for the recognition of indirect impacts, particularly growth inducement, as a major issue for the project, and for the analysis of induced growth in the RDEIS. Additionally, we support FHWA’s objective to avoid unplanned growth in environmentally sensitive areas. The analysis is more robust and quantitative than the majority of indirect impacts analyses provided in environmental documents, particularly at the Tier 1 phase.

*Analysis Area and Methods*

F-004-016

EPA recognizes the high quality of the RDEIS induced growth analysis; however we disagree with some of the analysis assumptions and conclusions. First, we disagree that the potential induced growth impacts of the alternatives would be limited to within one mile of the roadway and potential interchanges. The National Cooperative Highway Research (NCHRP) Report 466 *Desk Reference for Estimating the Indirect Effects of Proposed Transportation Projects* states “Development effects are most often found up to 1 mi around a freeway interchange, up to 2 to 5 mi along major feeder roadways to the interchange, and up to one-half mile around a transit station.” The proposed project crosses and provides access to thousands of acres of undeveloped farmland and other natural resources that may be developed in the future. Some of this area has development plans proposed or that are in the process of obtaining local, state, and federal entitlements. Intense local growth pressure in the area surrounding the proposed Parkway strongly suggests that induced growth impacts could occur at distances greater than one mile from the proposed Parkway alignment.

F-004-017

The area adjacent to the proposed Placer Parkway, including southwestern Placer County, is under intense growth pressure. NCHRP Report 466 states that land availability, infrastructure availability, regional economy, and land use controls are all factors that influence growth pressure in an area. We understand land near Placer Parkway is farmland primarily owned by a variety of business and investment interests with a small amount of farmland owned and operated by individual farmers. Development projects are being proposed that will extend infrastructure (sewer, water supply, etc) into currently undeveloped areas, further intensifying growth pressure<sup>10</sup>. The Placer County General Plan supports growth in this area, identifying southwestern Placer County as a future study area for potential urban expansion. Sutter County is planning a large residential and industrial project, the Sutter Pointe Specific Plan, in the area that would be directly serviced by Placer Parkway. The Placer Parkway DEIS states (page 1-17) that population will double in the local project vicinity by 2040.

<sup>10</sup> “Investments in infrastructure such as roads, sewers and water supplies can be one of the most important drivers of urbanization, since infrastructure provides the essential framework for development.” Heimlich, R.E.; Anderson, W.D., (2001), “Development at the Urban Fringe and Beyond: Impacts on Agriculture and Rural Land.” USDA Agricultural Economic Report No. (AER803).

**F-004-010**

Please see responses to Comments F-004-006, F-004-009, and F-004-019.

**F-004-011**

Please see Appendix A, which summarizes the results of the April 17, 2009 meeting and subsequent meetings, and the final resolution of the identification of the corridor most likely to contain the LEDPA.

**F-004-012**

The PRD includes additional quantitative analyses of secondary and indirect impacts on biological resources, including growth inducement and habitat fragmentation, based on the inclusion of hypothetical project components that are not proposed as part of the project. A map overlaying aquatic and terrestrial resources and planned, proposed, and/or approved development is included in the PRD as Figure G-26.

**F-004-013**

The Draft Tier 1 EIS/EIR acknowledges that Placer Parkway will likely have substantial (“significant” under CEQA) adverse impacts to sensitive aquatic and biological resources (please see Section 4.14.3, and in particular Section 4.14.3.4 and Section 4.14.3.5, Section 5.13, and the list in Section 5.17.1).

**F-004-014**

The no-development buffer remains as described in Section 2.2.4.1 of the Draft Tier 1 EIS/EIR. Please see page 17 of the PRD, where it states that, “It should be stressed that buffer zone reductions and/or

F-004-018

Observations of historic urban development patterns in the Sacramento Metropolitan Area, specifically in areas with intense growth pressure, such as Natomas, illustrate that when new infrastructure is provided (e.g., I-80 bypass, levees, sewer lines, wastewater treatment, water supply) in undeveloped areas near existing development, development will eventually “fill in” all undeveloped areas that do not have legislated growth controls or other growth restrictions. As stated above, the area of undeveloped land that could be accessed by the location of the new Parkway increases with distance north of Baseline Road. The further north the Parkway is located, the greater amounts of land and aquatic resources are vulnerable to induced growth impacts. Based on these local land use observations, a more appropriate analysis for estimating induced growth impacts from Placer Parkway would include the area between a Parkway alternative and existing or planned development.

F-004-019

**100-Year Floodplain and Definition of Potentially Developable Land**

F-004-020

EPA does not agree that land within the 100-year floodplain should be completely eliminated from the areas considered “developable” within the induced growth analysis. “Developable” land was defined in the RDEIS induced growth analysis as land that is not currently developed, planned for development, or constrained by features such as habitat conservation areas, the 100-year floodplain, or major municipal facilities. Historically, 100-year floodplain areas have been extensively modified and developed in the Sacramento Metropolitan Area and across the nation. This development has occurred despite local, state, and federal laws, regulations, and restrictions designed to protect the 100-year floodplain from development and the financial impacts to local governments and citizens after flood events. EPA does not support or advocate for development within the 100-year floodplain, but provides the following examples near the proposed Parkway alignments to demonstrate that the assumption of “no development within the 100-year floodplain” used in the growth-related impacts analysis is not reasonable:

- All of the Natomas Basin is within the 100-year floodplain and it is extensively developed. The westernmost segment (approximately 2 miles) of the proposed Parkway would be built in a 100-year floodplain in the Natomas Basin.
- The Sutter Pointe Specific Plan in Sutter County is proposed to be built entirely within the 100-year floodplain.
- One of the projects currently being considered by the City of Roseville proposes to restrict the floodplain of Pleasant Grove Creek in order to build more housing. The City of Roseville is not objecting to this proposed floodplain modification.

Based on these examples, as well as the historic and current development being proposed in the 100-year floodplain, it is not appropriate to eliminate all or a majority of the 100-year floodplain from areas that are considered potentially developable.

Floodplain protection legislation passed in California in October 2007 restricts development in floodplains, however development is still allowed if there is an appropriate level of flood protection or the local flood management agency has determined that adequate progress towards flood protection has been made.<sup>11</sup> EPA considers 100-year floodplains important areas to protect and agree they should not be encroached upon with urban development. However, we do not see evidence that 100-year floodplains are currently being protected from urban expansion, or will be in

<sup>11</sup> <http://www.legisweb.com/calnm/model/Retrieve.asp?ref=urn%3Acalm%3A2007%3Aab0005%3Adoc%3Ahtml>

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.”

Please also see page G-3 of Appendix G of the PRD, which reiterates that, “It should be stressed that the analyses presented below reflect responses to questions raised by the federal agencies and do not reflect changes in the project as proposed. The project includes a buffer zone and five to six interchanges, depending on the build alternative. For the purposes of this appendix, a hypothetical scenario is evaluated which eliminates the no-development buffer zone and adds an additional two to three interchanges. The scenarios identified and analyzed below are presented only for the purposes of responding to the hypothetical questions raised by the agencies, for purposes of their evaluation of the LEDPA.”

**F-004-015**

The commenter’s commendation for the growth inducement analysis is noted.

**F-004-016**

Please see response to Comment F-004-002.

Section 2.3 of Appendix G of the PRD presents the rationale for the selection of a one-mile analysis limit in that document (not in the Draft Tier 1 EIS/EIR, which used a much larger analysis area). The limit reflects National Cooperative Highway Research Program guidance for evaluating development effects associated with a freeway interchange. The limit was also intended to allow differentiation among alternatives by limiting the amount of overlap of the analysis areas of each alternative (as shown in Figure G-5), in response to the commenter’s request to provide more quantitative differentiation while assuming more

F-004-020

the future, especially in the area of the proposed Parkway. Based on this fact, and the fact that much development of land in floodplains has occurred in this region, the majority of 100-year floodplain should be included as "developable land" in the induced growth analysis.

Including or excluding 100-year floodplain from the definition of potentially developable land makes a significant difference in the results of the RDEIS induced growth analysis. Alternative 5 is considerably more growth inducing than Alternative 1 if 100-year floodplain is included in the calculation of potentially developable land. Adding the areas of 100-year floodplain to the areas of potentially developable land (supplied in Table G-3 of the RDEIS) shows that there are 5,805.5 acres of potentially developable land within 1 mile of Alternative 1 while there are 7,813 acres of potentially developable land within 1 mile of Alternative 5. Alternative 5 has 2,007.5 more acres of potentially developable land than Alternative 1, and using FHWA's methodology, this indicates that Alternative 5 is more growth inducing than Alternative 1. We understand that the entire 100-year floodplain may not be developable (for example, stream beds); however, it is evident that excluding the entire 100-year floodplain from areas considered potentially developable significantly alters the results of the analysis and subsequent conclusions.

F-004-021

EPA stated in our comments on the DEIS that when evaluating differences between each corridor, it is important to consider resource avoidance options (e.g., elevated structures, bottomless culverts) that are available *within* each corridor, so as to not prematurely eliminate a potential LEDPA alignment. We continue to recommend that the FEIS include planning-level avoidance commitments for each alternative that will be considered, such as arched (bottomless) culverts and elevated roadway structures or spans.

**Induced Growth Analysis Conclusions**

F-004-022

EPA disagrees with many of the conclusions in the RDEIS induced growth analysis. First, we disagree with the conclusion that the growth inducing impacts of Placer Parkway are limited by the anticipated residential build-out of approved and proposed developments by 2040 regardless of Parkway construction. The CEQA documents describing environmental impacts and mitigation measures for three projects (Placer Vineyards Specific Plan, Regional University Specific Plan, and Sutter Pointe Specific Plan) that would be served by Placer Parkway include the construction of Placer Parkway as a measure to mitigate traffic impacts generated by these developments. Using Placer Parkway for traffic mitigation suggests that building the Parkway facilitates local developments that will be constructed before Placer Parkway construction.

F-004-023

Second, we are concerned that the growth inducement analysis may have been influenced by a pre-analytical assumption that there would not be substantial differences in growth inducement potential among the corridor alignments. The RDEIS states, "its [Placer Parkway's] growth inducement potential would be limited by a number of factors. These include...an assumption that there would not be substantial differences in growth inducement potential (and therefore in the potential for secondary and indirect impacts) among the corridor alignment alternatives." Assuming there will be minimal differences in growth inducement potential (and the subsequent secondary and indirect impacts to aquatic resources) among project alternatives before conducting the relevant analyses makes it more likely to come to the same conclusion that is stated in the RDEIS.

F-004-024

Third, for reasons stated above, we do not agree with the conclusion that the new quantitative analysis presented in the RDEIS supports the DEIS findings that the differences among

interchanges and no buffer. Please see Section 6.1 in the Draft Tier 1 EIS/EIR for the project's growth inducement analysis.

**F-004-017**

Section 1.2 (Project Need), Section 1.3 (Project Purpose), and Section 6.1 (Growth) of the Draft Tier 1 EIS/EIR all acknowledge that the Parkway is proposed in an area that is subject to considerable existing and future growth pressure, and that several major development projects are currently planned in this area (please see Figure 1-15 in the Draft Tier 1 EIS/EIR).

**F-004-018**

Please see response to Comment F-004-007, which discusses the findings of the growth inducement analyses included in the Draft Tier 1 EIS/EIR and the PRD. Please also see response to Comment F-004-017, which discusses the potential influence of new infrastructure in the study area.

The findings of the analyses do not support the commenter's assertion that growth will be most likely as a result of provision of new infrastructure and in fact confirm that the Parkway is proposed to be located in an area already subject to intense growth pressure that is likely to result in new development irrespective of the Parkway, and in which there is very little difference in effects between any of the Parkway build alternatives.

**F-004-019**

Please see response to Comment F-004-007, which discusses the commenter's assertion that growth inducement associated with the Parkway would increase the farther north the Parkway is located. An additive approach that assumes that the farther north the Parkway is located, the greater the amounts of land and resources that would be

**F-004-024** | corridor alignment alternatives are not substantial in terms of their growth inducement potential or the conclusion that Alternative 5 would have the least impacts from induced growth.

**F-004-025** | Fourth, we do not agree with the conclusion that Alternative 5 will be a northern border for development as suggested in the RDEIS. Reason Farms, located north of Alternative 5, may provide a barrier for development adjacent to the Parkway alignment, but it is not adjacent to the entire length of the Parkway. The City of Roseville's plans for Reason Farms may also change. The Reserve Acquisition Areas identified in the proposed Placer County Conservation Plan (PCCP) are not inhibitors of growth north of the freeway as the PCCP is not an approved plan. The Reserve Acquisition Areas are identified in the draft PCCP map, regardless of the Placer Parkway route chosen. There are no other stated resource protections or growth controls in the Placer County General Plan or zoning code that support the conclusion that Placer Parkway Alternative 5 would be a barrier to growth north of the Parkway.

#### SECONDARY AND INDIRECT IMPACTS ON BIOLOGICAL RESOURCES ANALYSIS

**F-004-026** | The RDEIS analysis of secondary and indirect impacts on biological resources is based on the framework and results of the induced growth analysis. The RDEIS states that it considers a landscape-based approach, however only the impacts to biological resources within one mile of each of the alternatives are considered in the analysis. An analysis of a two-mile wide area of land is not a landscape based analytical design. An improved approach would evaluate resources and impacts from a broader perspective, and consider how the various alternatives would impact regional hydrology, ecosystems, and wildlife movement.

An analysis area of a one-mile radius buffer strip around the proposed Placer Parkway alignments is a linear analysis, rather than a landscape-based evaluation of impacts, and may underestimate the impact of habitat fragmentation on vulnerable resources. The analysis area should be broader to more accurately reflect the landscape impact of Placer Parkway on habitat and biological resources. For example, a simple landscape evaluation can be done by evaluating the size of habitat blocks (areas lacking urban or industrial land use) created by the construction of Placer Parkway. Alternative 1 maintains the greatest amount of habitat free of large transportation barriers and minimizes edge area impacts on aquatic wildlife and habitat by maximizing the size of one habitat block and minimizing the size of the other. On the contrary, Alternative 5 maximizes edge area by creating two habitat blocks closer in size. This simple analysis approaches fragmentation from a landscape level and is more reflective of impacts to biological resources from fragmentation than restricting the evaluation to a 1-mile buffer around the Placer Parkway alternatives.

**F-004-027** | We do not agree with the RDEIS conclusion that "the proposed Placer Parkway build alternatives would not substantially reduce the potential viability of the remaining habitat units available for key sensitive species in western Placer County." FHWA appears to base this conclusion on the "minimum habitat reserve area" determined by the PCCP 2004 Science Advisors Report<sup>12</sup> to be 200 acres for vernal pool complexes. Specifically, the statement that, "...

<sup>12</sup> Brussard, P; F. Davis, J Medieros, B. Pavlik, and D. Sada; 2004. *Report of the Science Advisors: Planning Principles, Uncertainties and Management Recommendations for the Placer County Natural Communities Conservation Plan and Habitat Conservation Plan.*

impacted by induced growth does not treat all alternatives equally, contradicts standard and accepted impact analysis methodologies, and is not supported by any known literature on roadway project effects. No references, guidance, or professionally accepted methodologies for growth inducement assessment, including those evaluated as part of preparation of the Draft Tier 1 EIS/EIR or the PRD or referenced in the commenter's letter, support this approach. Selecting Alternative 1 as the base alternative onto which all developable land going north would be developed is not an appropriate analysis approach; clearly the acreage of potentially developable land acreage increases northward as the area of land being evaluated correspondingly increases in size. This would be the same if the same approach were applied from north to south, and none of the analysis' findings support the assertion that the selection of a southern alternative (e.g., Alternative 1) would create a form of growth boundary, preventing growth in the area to the north. This is supported by Placer County's recent approval of the Regional University Specific Plan, north of Alternative 1 and growing development from east to west. Please also see Comment L-014-012, which is a comment from Placer County that states that the County considers it most likely that future growth in the study area will proceed from east to west.

#### **F-004-020**

Please see response to Comment F-004-003, which discusses development in floodplains. Placer County has consistently refused to allow development in floodplains, except for certain infrastructure.

#### **F-004-021**

Please see response to Comment F-002-007, which discusses planning-level avoidance features. It is premature to commit to more specificity at the Tier 1 level.

F-004-027

conservation of these species [vernal pool fairy shrimp and tadpole shrimp] is less dependent on maintaining larger blocks of contiguous habitat” is in direct conflict with the 2005 USFWS Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon (Recovery Plan). The Recovery Plan explains that as vernal pool species’ populations become isolated, smaller patches of habitat have a higher propensity toward localized extinction events. Management of smaller preserves is also difficult because control methods for invasive plants, such as grazing and burning, are prohibited by size and isolation of preserves. The Recovery Plan states, “Limiting this size of a preserved area or preserving an area geographically isolated from other preserves could preclude the long-term conservation of the species;” and, “Minor fragmentation of vernal pool habitats may effectively serve as a seed, pollen, and pollinator dispersal barrier between adjacent sites for many of the plants covered by this recovery plan.” These statements indicate that large blocks of contiguous habitat are important to the recovery of vernal pool ecosystems. The FEIS should be updated to include information from the Recovery Plan.

F-004-028

The DEIS and RDEIS state that Alternative 1 is more fragmenting than Alternative 5 because Alternative 1 has 6 more stream crossings than Alternative 5. We support efforts to minimize stream crossings and understand that additional crossings can sever or impair hydrological and biological connectivity. It is important to acknowledge and describe in the FEIS that there are stream crossing designs that provide wildlife and habitat connectivity and do not impair hydrological connectivity or destroy habitat linkages. We encourage FHWA and SPRTA to minimize impacts to streams and habitat connectivity by engineering crossings to maintain hydrologic function, habitat connectivity, and wildlife and fish passage.

F-004-029

**Potential Placer County Conservation Plan Implementation**

F-004-030

EPA’s concerns regarding habitat fragmentation are reflected in our comments on the PCCP. It is responsible and appropriate for FHWA to consider and incorporate local conservation planning into the evaluation of Placer Parkway and its future location. We are pleased that PCCP is included in the RDEIS evaluation.

F-004-031

It is difficult to estimate induced growth and fragmentation impacts in the Development Transition Area (DTA) of the PCCP and provide analytical results meaningful to informing an induced growth and fragmentation analysis. Approximately 40% of the DTA is proposed for conservation which would eliminate these areas from potentially developable land. However, the PCCP does not identify the areas within the DTA that will be conserved. The DTA areas that fall within a one-mile radius of each Placer Parkway Alternative may have up to 40% less potentially developable land than reported in Tables G-7 and G-8.

F-004-032

A PCCP solution, which ensures protection of enough of the remaining aquatic resources in western Placer County to comply with the CWA Section 404(b)(1) Guidelines requirement for avoidance, would considerably reduce concerns about induced growth from Placer Parkway, other public infrastructure projects, and urban expansion. The current PCCP map endorsed by the Placer County Board of Supervisors proposes certain areas of Placer County to be part of Reserve Acquisition, Conservation, Development Transition, or Development Areas. However, EPA, the Corps, and other resource agencies reviewed PCCP maps identified in the January 23, 2007 Placer County Planning Department Staff Report to the Board of Supervisors and found that other PCCP alternatives (alternatives 2, 4, 6, and 7) were most likely to meet wetland protection requirements of the 404(b)(1) Guidelines, protect threatened and endangered species, and characterize a successful

**F-004-022**

The three specific plan projects referenced by the commenter have all been approved (the Placer Vineyards Specific Plan, the Regional University Specific Plan, and the Sutter Pointe Specific Plan). These plans are going forward and are independent of the Parkway. The environmental impact reports for these projects noted that, if Placer Parkway and other potential future roadway improvements are not made, the roadway segments would continue to operate at an unacceptable level, and concluded that related impacts are considered "significant and unavoidable" under CEQA. The Boards of Supervisors for Placer and Sutter counties adopted Statements of Overriding Considerations.

The Draft Tier 1 EIS/EIR acknowledges that, “by providing improved access to adjacent areas, Placer Parkway could be one of many factors that would encourage growth in these areas sooner than this might otherwise occur. Thus, it would be growth inducing” (page 6-15). If the Parkway is not approved, there is every reason to believe that the plans would still be built-out, because they are not conditioned on construction of the Parkway, resulting in worse congestion and air quality than if the Parkway were approved and constructed.

One of the purposes of the project is to “advance economic development goals in southwest Placer County and south Sutter County (page 1-7). One such area is the Sutter Pointe Specific Plan area, which is identified as an industrial growth area in the Sutter County General Plan, to which Placer Parkway will “improve regional accessibility for businesses and jobs in the project vicinity, including access to SR 70/99 (page 1-8).

**F-004-023**

The statement in the PRD referred to by the commenter is taken out of context. The full text states the following, which references the extensive growth inducement analyses undertaken to support the assumption referenced by the commenter: “The Draft Tier 1 EIS/EIR growth

F-004-032

natural resource reserve system<sup>13</sup>. PCCP Reserve Acquisition Areas, which EPA and other federal agencies support, include Reserve Acquisition Areas south of Alternative 5. The current PCCP map may result in considerably less avoidance of remaining aquatic resources and endangered species habitat. As a result, EPA and other federal agencies remain very concerned about potential induced growth impacts from Placer Parkway and other projects in the western Placer County area.

**CUMULATIVE IMPACTS ANALYSIS**

Given the magnitude of potential resource impacts in the vicinity of the proposed project (particularly to aquatic resources, species, and habitat), EPA recommended through our September 25, 2007 DEIS comment letter that FHWA prepare a robust cumulative impacts analysis that would 1) determine the resource study area for and the baseline condition of each resource of concern, 2) assess reasonably foreseeable changes to environmental resources over time, and 3) identify potential landscape-level mitigation opportunities.

F-004-033

The RDEIS contains an improved analysis of cumulative impacts, including quantitative information on historic degradation of aquatic resources and proposed impacts of future development. EPA disagrees with the conclusion that the project's impacts on these resources would be "low." The analysis only considers the percentage of resource areas that would be directly impacted by the Parkway, rather than including the area that would be impacted by the Parkway's induced growth impacts. Cumulative impacts are the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions (CEQ Regulations, Part 1508.7). If both direct and foreseeable indirect impacts were considered, the percentage of potentially impacted resource areas would be much larger. In addition, the past declines in resources, which the analysis recognizes, make protection of remaining resources critical, and provide the context behind why these impacts are significant.

**PREFERRED BLUEPRINT SCENARIO AND PLACER PARKWAY**

F-004-034

The Greenhouse Gas Emissions section of the RDEIS states that the Placer Parkway project is included in the Sacramento Area Council of Governments' Preferred Blueprint Scenario (Blueprint) and therefore, if built, would reduce greenhouse gas emissions in the region. While the route is identified in the Blueprint, "the transportation system which underlies the Blueprint Map is for educational purposes, and does not reflect a policy recommendation or decision by the Board."<sup>14</sup> We recognize that the Blueprint is a framework to guide development decisions by local government and commend SACOG for promoting such a complete vision of future constrained growth and reduced vehicle-miles-traveled in the region. However, it is foreseeable that municipalities may or may not follow its guidelines, so environmental analyses need to consider and analyze the environmental impacts that would result from both a "Blueprint" scenario, as well as potential development scenarios that don't align exactly with the Blueprint Vision. We understand that some of the proposed developments in the vicinity of the Parkway alternatives and located in Placer County would be built at densities that do not meet the standards recommended by the Blueprint. If built, these developments would not accommodate the number of housing units needed

<sup>13</sup> August 14, 2007 letter from EPA Region 9 and Army Corps of Engineers to Placer County Board of Supervisors.  
<sup>14</sup> [http://www.sacreregionblueprint.org/sacreregionblueprint/the\\_project/discussion\\_draft\\_preferred\\_scenario.cfm](http://www.sacreregionblueprint.org/sacreregionblueprint/the_project/discussion_draft_preferred_scenario.cfm).

inducement analysis is based on both qualitative and quantitative evaluations. A variety of qualitative analytical approaches and methodologies concluded that Placer Parkway would be growth inducing, but that its growth-inducement potential would be limited by a number of factors. These include the anticipated residential build-out of approved and proposed developments by 2040 regardless of Parkway construction, and an assumption that there would not be substantial differences in growth inducement potential (and therefore in the potential for secondary and indirect impacts) among the corridor alignment alternatives. The MEPLAN analysis supported the qualitative conclusions and included detailed projections, indicating that the southern corridor alignments (Alternatives 1, 2, and 3) would attract somewhat higher numbers of households and jobs from the rest of the region to the local project vicinity than northern corridor alignments (Alternatives 4 and 5)" (page G-45).

It is acknowledged that the use of the term "assumption" in the quoted paragraph could erroneously suggest that the growth analysis in the PRD was predetermined: it should be clarified that the assumptions about growth in the PRD were not made in a "pre-analytical" manner, but were based on the growth inducement conclusions referenced in the above paragraph. Please also see response to Comment F-004-002. For clarification, the third sentence of the above paragraph is revised as follows:

These include the anticipated residential build-out of approved and proposed developments by 2040 regardless of Parkway construction, and the various methodologies described in Chapter 2 of this Partially Revised Draft Tier 1 EIS/EIR. These analyses concluded an assumption that there would not be substantial differences in growth inducement potential (and therefore in the potential for secondary and indirect impacts) among the corridor alignment alternatives.

**F-004-034**

in the area, and would necessitate more development in areas that the Blueprint proposed for non-urban uses. Because the potential exists for the Parkway to facilitate access to developments that both meet the Blueprint Vision, as well as developments that may not meet the Blueprint vision, the Parkway should not be characterized as being an integral part of the Blueprint, or a “smart growth” vision of the region.

**F-004-035**

We understand that SACOG is developing a more thorough assessment of aquatic resources in the SACOG region. This will supplement the Blueprint and allow for regional planning that accommodates growth while protecting aquatic resources at a landscape level.

As described in Master Response 1, the PRD provided additional analysis, presented in Appendix G of the PRD, including a geographic information system (GIS)-based analysis (Section 2.3 of Appendix G) of growth inducement, secondary and indirect biological impacts, and cumulative impacts associated with several hypothetical project components, including additional interchanges not proposed as part of the project and the elimination of the project’s no-development buffer zone, also not proposed. The analysis used the same GIS database for environmental resources used for the EIS/EIR but was to all other intents and purposes a completely separate and independent analysis to that presented in the Draft Tier 1 EIS/EIR, prepared in response to resource agency questions on that document. No pre-analytical assumptions were made about the outcome or reflected in the analysis methodology.

**F-004-024**

Please see responses to Comments F-004-022 and F-004-023. Please also note that the revisions to the PRD identified in Chapter 4 concluded that there was no substantial difference among build alternatives, with respect to growth inducement, similar to the statement quoted in Comment F-004-023.

**F-004-025**

The PRD does not assert that Alternative 5 would be a barrier to development but instead states that the planned City of Roseville Retention Basin, immediately north of a substantial portion of the Alternative 5 alignment, would inhibit the future construction of an interchange in this area, which would contribute to limiting growth north of the Parkway. This discussion goes on to say, “Similarly, a long portion of the Alternative 5 corridor alignment runs along the southern edge of several sizable areas designated as Reserve Acquisition Area on the Ad Hoc Committee Placer County Conservation Plan Alternative 4

Modification of the "National Environmental Policy Act/Clean Water Act  
Section 404 Integration Process for Surface Transportation Projects  
Memorandum of Understanding (NEPA/404 MOU)"  
for application to  
the Placer Parkway Corridor Preservation Project  
April 12, 2004

The NEPA/404 MOU integrates requirements of the Clean Water Act Section 404 permit process into the NEPA environmental review. This integration facilitates the preparation of the Section 404 permit application at the end of the NEPA process. While a Tier 1 evaluation will not result in a Section 404 permit application, the associated Tier 2 project will require a permit. Therefore, the NEPA/404 process is modified for Tier 1 to reflect decisions made at Tier 1, and to anticipate the permit application requirements at Tier 2. The NEPA/404 process for Tier 2 will follow the standard procedure outlined in Appendix A of the NEPA/404 MOU.

The goal of the modified NEPA/404 process for Tier 1 is to ensure that Tier 1 decisions reflect careful consideration of the 404(b)(1) Guidelines (40 CFR 230), which are binding, substantive regulations implementing the Clean Water Act. The Guidelines should be addressed as early as possible in the Tier 1 NEPA evaluation to eliminate the need to revisit decisions in Tier 2 that might otherwise conflict with 404 permit requirements.

The Tier 1 (modified) and Tier 2 (standard) NEPA/404 processes are similar in many respects. Both Tier 1 and Tier 2 NEPA/404 include five concurrence points<sup>2</sup>. The main difference between Tier 1 and Tier 2 NEPA/404 processes are the last two concurrence points. In Tier 2, the project proponent seeks agency concurrence on the "least environmentally damaging practicable alternative" (LEDPA) and the conceptual mitigation plan for the LEDPA. In Tier 1, however, the project proponent seeks agency concurrence on the alternative (corridor) *most likely to contain the LEDPA*, and on the *general framework* for mitigation. All other elements of the standard NEPA/404 process apply, unless otherwise indicated.

The Tier 1 modified NEPA/404 process includes five concurrence points:

1. Purpose and Need
2. Criteria for Selecting the Range of Alternatives
3. Range of Alternatives
4. Alternative(s) most likely to contain the LEDPA
5. Mitigation Framework

<sup>1</sup>Signed by Federal Highway Administration, Federal Transit Administration, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Transportation, Arizona Department of Transportation, Nevada Department of Transportation (1993).

<sup>2</sup>Concurrence/Non-Concurrence is described in Section VI of the NEPA/404 MOU.

map which is included as Figure G-18. (Although this map has not been adopted, Placer County staff has indicated that the purple "Reserve Acquisition Areas" of this map represent a "consensus area" for future habitat conservation. Resource agency staff recommended consideration of the implications of this map for Placer Parkway alternatives, even though it has not yet been formally adopted.) The presence of these relatively large features along the northernmost corridor alignment alternative would limit the potential for growth along the north side of the Placer Parkway corridor, while the more southerly corridor alignment alternatives have no similar features that would constrain or preclude growth from occurring both north and south of a roadway alignment in those locations..." (page G-46). The transportation agencies acknowledge the commenter's assertion that the City of Roseville's plans for Reasons Farms may change, and this same assertion could apply to any of the currently proposed and planned developments in the study area.

The PRD acknowledges that the Placer County Conservation Plan (PCCP) is not yet an approved Plan (Section 4.2.1 of Appendix G) and consequentially does not assume the existence of the PCCP in the growth inducement analysis. The analysis of secondary and indirect biological impacts includes an evaluation with and without the implementation of the PCCP. As stated in Section 2.3 of Appendix G of the PRD, should the PCCP be approved in the future, a major portion of the land in the Central Segment north of Alternative 5 would be classified as Reserve Acquisition Area and as such would not be available for development.

#### F-004-026

Please see response to Comment F-004-016, which explains why a one-mile analysis area was used to evaluate growth associated with hypothetical changes to the proposed project. Please also see response to Comment F-004-002, which discusses the secondary and indirect



These concurrence points are sequential, each one building upon and consistent with previous concurrences. Concurrence points #1 to #3 occur prior to completion of the Tier 1 Draft EIS. Concurrence points #4 and #5 occur prior to completion of the Tier 1 Final EIS. The NEPA/404 signatory agencies may agree to bundle concurrence points for purposes of review.

Concurrence Point #1: Purpose and Need

The Council on Environmental Quality regulations implementing NEPA call for a statement of purpose and need (40 CFR 1502.13). The Section 404(b)(1) Guidelines include a basic purpose (40 CFR 230.10(a)(3)) and an overall project purpose (40 CFR 230.10(a)(2)). For NEPA/404 integration, one statement of purpose and need should be developed to meet all requirements.

The NEPA purpose and need statement briefly specifies the underlying purpose and need of the proposed project. The NEPA document should explain the project need, and demonstrate the project's logical termini and independent utility.

The Section 404(b)(1) Guidelines basic purpose is a brief statement that assists regulators in determining whether a project is water-dependent. The overall project purpose is an elaboration of the basic purpose, and provides a more specific description of the purpose and need for the project.<sup>3</sup> The overall project purpose should be broad enough to allow for an appropriate range of alternatives that avoid special aquatic sites, as defined in the Section 404 (b)(1) Guidelines (40 CFR 230 Subpart E). "Avoidance alternatives" could include alternatives that do not require securing a new right-of-way, maximize use of existing infrastructure, implement congestion pricing, or adjust the project study area to include alignments that impact fewer aquatic resources.

Concurrence Point #2: Criteria for Selecting the Range of Alternatives

The project sponsor develops criteria for selecting a reasonable range of alternatives. If the number of potential alternatives generated is very large, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS.<sup>4</sup> The criteria can be used to screen out or narrow the range of alternatives that will be carried forward for analysis in the Draft EIS. For NEPA/404 MOU projects, environmental criteria should be applied so that each alternative can be ranked based on its impact to the aquatic ecosystem.

Two types of screening criteria that can be effective for Tier 1 decision making are "project purpose" and "fatal flaw" analyses. Under the Clean Water Act Section 404 (b)(1) Guidelines, an alternative may be eliminated from consideration in the Draft EIS if it does not meet the project purpose. Fatal flaws are unavoidable or unmitigatable impacts associated with an alternative that are so great that the project could never go forward.

<sup>3</sup>For a discussion of basic purpose and overall project purpose, see Yocom, T.G., R.A. Leidy, and C.A. Morris. 1989. "Wetlands Protection Through Impact Avoidance: A Discussion of the 404(b)(1) Alternatives Analysis." Wetlands. Vol 9, No. 2, pages 283-297.

<sup>4</sup>Council on Environmental Quality's Questions and Answers about the NEPA Regulations, Question 1.b. (1981)

impact study area used in the Draft Tier 1 EIS/EIR, and responses to Comments F-003-009 and F-004-009, which discuss habitat fragmentation in the context of the Parkway alternatives. The secondary and indirect impact study area used in the Draft Tier 1 EIS/EIR evaluated an expansive area of Sacramento, Placer, and Sutter counties surrounding the proposed project as described in the response to Comment P-001-002.

This comment suggests that the northern alternatives would divide the existing habitats into two equal-sized blocks and would increase the "edge area" of these blocks. However, this comment does not consider the existing fragmentation of the habitats between Pleasant Grove Creek and Baseline Road. Habitats in this area consist of small blocks generally less than 100 acres that are separated by roads, residential development, and a range of irrigated and non-irrigated agricultural land uses. Alternative 5 would not substantially increase the "edge area" of existing habitat blocks between Pleasant Grove Creek and Baseline Road because the existing habitat blocks already have substantial areas of edge habitat as a result of the diverse range of existing land uses.

**F-004-027**

As described in the response to Comment F-004-016 above and in Appendix G of the PRD, transportation projects are most likely to influence growth within one mile of intersections or interchanges. The more conservative evaluation for this project included all land that would be available for future development within one mile of the project limits. All of the proposed alternatives have the potential to directly and indirectly fragment and isolate vernal pool complexes. However, the direct and indirect impacts evaluated in the PRD are not substantially different for the five alignments.

Section 4.14.3 of the Draft Tier 1 EIS/EIR discusses potential effects on vernal pool branchiopods and acknowledges that vernal pool complexes

Concurrence Point #3: Range of Alternatives

The Range of Alternatives includes those alternatives that will be evaluated in the Draft EIS. For NEPA/404 projects, the range should include alternatives that avoid and minimize impacts to waters of the U.S. to the greatest extent possible. The range can include reasonable alternatives not within the jurisdiction of the lead agency, and a no-action alternative (40 CFR 1502.14 (c) and (d)).

— Tier 1 DEIS Circulation and Public Comment Period —

Concurrence Point #4: Alternative(s) most likely to contain the LEDPA

The U.S. Army Corps of Engineers cannot grant a CWA Section 404 permit to a Tier 2 preferred alternative that is not the LEDPA. Therefore, it is critical that any alternative likely to contain the LEDPA is not prematurely eliminated during the Tier 1 NEPA review. Although a Tier 1 landscape-level analysis may provide enough information to eliminate alternatives that would clearly have the *greatest* environmental impacts, the analysis may not be detailed enough to identify with certainty a *single* alternative that is likely to contain the LEDPA. If the Tier 1 analysis indicates that there are several alternatives likely to contain the LEDPA, and the lead agency does not want to prematurely eliminate any alternative likely to contain the LEDPA, then all of the alternatives likely to contain the LEDPA should be carried forward to Tier 2.

However, the lead agency can attempt to further narrow the range of alternatives likely to contain the LEDPA by performing additional analysis in Tier 1. Analytical tools could include:

- functional assessment of aquatic resources,
- photo-interpretation of aerial photos,
- spot surveys,
- delineations in selected areas of special significance,
- full delineation of waters of the U.S., or
- geo-referenced data points from delineations done for this or other projects.

If the lead agency chooses to eliminate in Tier 1 any alternative(s) likely to contain the LEDPA, there is a risk that the eliminated alternative(s) may need to be revisited in Tier 2.

Concurrence Point #5 – Mitigation Framework

The Tier 1 mitigation framework will describe in general terms the processes that the project sponsor will use to maximize opportunities for successful mitigation, including long-term mitigation and management of resources. The framework should identify:

1. Mitigation options available for creation, restoration, enhancement and preservation of aquatic resources (e.g., land dedication, acquisition of conservation easements, in lieu fees for acquisition, mitigation banks), and potential mitigation sites.

would be susceptible to the effects of fragmentation caused by a new roadway. Section 5.13 discusses potential vernal pool species impacts that are "significant and unavoidable" under CEQA, acknowledges that direct impacts of the Parkway on these species would be "significant and unavoidable" under CEQA, and describes potential mitigation that could be implemented to reduce these impacts. Section 4.14.4 also discusses mitigation measures that could be implemented to reduce impacts on vernal pool species.

The Draft Tier 1 EIS/EIR is updated to further address this comment. The first sentence of the last paragraph on page 4.14-28 is revised as follows:

Vernal pool complexes would be directly and indirectly affected as a result of construction of the Parkway, which could adversely affect populations of these special-status species.

The last sentence of this same paragraph is revised as follows:

However, it is unlikely that Conservancy fairy shrimp is present in the vernal pools in the study area because of the extremely sparse distribution of this species throughout its range and the absence of large playa-type pools typical of locations where this species has been documented.

The following paragraph is inserted before the first full paragraph on page 4.14-29:

Direct impacts of the proposed project would reduce the size of some existing vernal pool complexes that have been identified and mapped by Placer County (please see Figure 4.14-2 in the Draft Tier 1 EIS/EIR). Although the proposed project would not directly

2. Opportunities to build upon existing or planned conservation efforts of other agencies and non-governmental organizations for the purposes of protecting and restoring large, intact landscapes.
3. Institutions and instruments for long-term management of mitigation sites.

— Tier 1 FEIS Circulation. Agency Comment Period. Tier 1 Record of Decision. —

Note: It is presumed that the Tier 2 project will follow the standard NEPA/404 MOU process.

affect the vernal pools and uplands outside of the project limits, the proposed project could indirectly affect listed vernal pool branchiopods if they are present in adjacent wetland habitats. Indirect effects could include changes in hydrology, water quality, and barriers to species dispersal due to the reduction in size, quality, and connectivity of the vernal pool habitats to other similar habitats in the project vicinity. Indirect impacts are addressed in more detail in Section 4.14.3.4 (Secondary and Indirect Impacts).

On page 4.14-34, the following paragraph is added as an additional sub-bullet point under the second bullet point at the end of Section 4.14.4.3:

A site-specific assessment of this impact would be implemented during the Tier 2 evaluation when the actual limits of the proposed project are defined. Where feasible, the project will be designed to minimize adverse impacts to the size, quality, or connectivity of adjacent vernal pool complexes by maintaining appropriate setbacks for ground-disturbing impacts, constructing culverts and drainage features for the future roadway to minimize changes to the natural hydrology or degradation of water quality in adjacent wetlands, where practicable and feasible. If indirect effects cannot be substantially avoided or minimized, the project proponent would implement mitigation consistent with the strategies described in Section 4.14.4.4 (Tier 2 – Mitigation Considerations) below.

Please see response to Comment F-004-026, which discusses the existing landscape in the study area and the fact that it is not a large block of contiguous habitat. Based on the available information, the transportation agencies conclude that construction of Alternative 5 would not preclude the future conservation of a large block of undeveloped habitat south of the proposed alignment. The undeveloped area south of Alternative 5 includes large areas that are currently planned for



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 75 Hawthorne Street  
 San Francisco, CA 94105-3901

September 25, 2007

Gene Fong  
 Division Administrator  
 Federal Highway Administration  
 650 Capitol Mall, Suite 4-100  
 Sacramento, CA 95814

Subject: Draft Tier 1 Environmental Impact Statement/Environmental Impact Report  
 for the Placer Parkway Corridor Preservation Project (CBQ #20070278)

Dear Mr. Fong:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document. We understand that for this project, responsibilities for complying with the National Environmental Policy Act (NEPA) remain with the Federal Highway Administration (FHWA) and are not delegated to the State of California in the pilot program for NEPA delegation. Placer Parkway is identified as an "exception" project in the *Memorandum of Understanding (MOU) Between the FHWA and Caltrans Concerning the State of California's Participation in the Surface Transportation Project Delivery Pilot Program (June 2007)*. Our enclosed detailed comments were prepared pursuant to the NEPA, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act.

This project is following the NEPA/Clean Water Act Section 404 Integration Process MOU (NEPA/404 MOU), as modified for Tier 1 projects, so that decisions made in Tier 1 are consistent with the requirements of Clean Water Act (CWA) Section 404 permitting at the end of the Tier 2 project. We commend FHWA, Caltrans, and the South Placer Country Regional Transportation Authority for engaging in this collaborative approach at Tier 1 and for your responsiveness to EPA's input throughout the NEPA/404 MOU process.

Based on our review of the Draft Environmental Impact Statement (DEIS), we have rated the build alternatives as Environmental Concerns-Insufficient Information (EC-2). Please see the enclosed Summary of EPA Rating Definitions. EPA's major area of concern is the analysis of indirect (secondary) impacts of the Parkway, including potential growth-inducing impacts to aquatic resources, special status species, and biological habitat.

We are particularly concerned that the DEIS lacks a robust qualitative description and quantitative estimates of the Parkway's potential indirect impacts, including effects on sensitive resources due to growth inducement and habitat fragmentation. The DEIS appears

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development (e.g., Regional University) or that are likely to be developed even in the absence of the Placer Parkway (e.g., Curry Creek Specific Plan). Each of these projects would require separate approvals by federal and state regulatory agencies that are not contingent upon approval of the Tier 1 Placer Parkway project evaluated in this EIS/EIR.

Please see response to Comment F-005-003, which also discusses habitat conservation and fragmentation effects.

**F-004-028**

Section 4.12.4 of the Draft Tier 1 EIS/EIR discusses potential measures that could be used to minimize impacts associated with stream crossings. These measures will be developed further in the Tier 2 stage, and it is acknowledged that stream crossing designs are available that minimize adverse impacts on biological resources and water quality.

**F-004-029**

Please see response to Comment F-002-007, which discusses planning-level avoidance features.

**F-004-030**

The commenter acknowledges the inclusion of the proposed PCCP in the PRD evaluation. This comment is noted.

**F-004-031**

It is acknowledged that approximately 40 percent of the land in the proposed PCCP Development Transition Area (DTA) is proposed for conservation and may not be developed if the PCCP is implemented. It is not possible to estimate the specific amount of conserved land within the one-mile analysis area of any of the proposed alternatives because the locations of conservation areas within the DTA in these analysis areas are likely to be located in order to maximize preserve size and

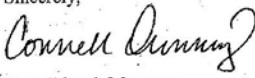
to exclude from analysis the indirect impacts of the planned and potential additional interchanges, such as the Watt Avenue interchange. Finally, the DEIS does not demonstrate how the "no-development buffer concept" will be implemented to prevent additional interchanges on the Parkway and to prevent near roadway development.

The enclosed detailed comments also provide recommendations related to the following: 1) cumulative impact analysis, 2) hydrology, floodplains, and water quality, 3) air quality, and 4) the hypothetical Land Use and Policy (smart growth) Scenario.

The next steps in the modified NEPA/404 MOU process are the following: 1) select the corridor(s) most likely to contain the "least environmentally damaging practicable alternative (LEDPA)," the only alternative that can be permitted under CWA Section 404, and 2) determine the general mitigation framework for the project. The CWA Section 404 (b)(1) guidelines require consideration of direct, secondary (indirect), and cumulative impacts when determining the LEDPA. We would like to offer our assistance to work with you on these NEPA/404 checkpoints.

We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact me or Nancy Levin, the lead reviewer for this project. Nancy can be reached at 415-972-3843 or levin.nancy@epa.gov.

Sincerely,

  
 For Nova Blazej, Manager  
 Environmental Review Office

Enclosures:

Summary of EPA Rating Definitions  
 EPA's Detailed Comments  
 NEPA/Clean Water Act Section 404 Integration Process MOU Modified for Tier 1 (2004)

cc:

Celia McAdam, South Placer Regional Transportation Authority  
 Katrina Pierce, California Department of Transportation  
 Tom Cavanaugh, U.S. Army Corps of Engineers  
 Ken Sanchez, U.S. Fish and Wildlife Service  
 John Baker, National Marine Fisheries Service  
 Jeff Finn, California Department of Fish and Game

minimize edge effects, and these locations have not yet been determined. The amount of conserved land could in fact be higher or lower than 40 percent in any area of the DTA that falls within the one-mile analysis areas. Alternatively, the PCCP may not be implemented at all, and for this reason the PRD includes an analysis of potential fragmentation effects associated with growth both with and without the implementation of the PCCP (Tables G7 and G8 in PRD Appendix G).

**F-004-032**

This comment is noted. Negotiations regarding the PCCP conservation strategy are outside the scope of the Draft Tier 1 EIS/EIR. However, it should be noted that SPRTA will be a participating agency in the PCCP and the Parkway is a Covered Activity under the plan.

**F-004-033**

Potential impacts on biological resources associated with growth are evaluated in the secondary and indirect impacts analysis presented in the Draft Tier 1 EIS/EIR, in Section 4.14.3.4. Additional analysis of potential impacts associated with growth as part of the evaluation of hypothetical changes to the project is presented in the PRD. The commenter is correct in stating that this analysis does not quantify the potential indirect impacts on aquatic resources that could occur as a result of induced growth associated with any one of the Parkway's build alternatives, because the actual indirect impacts are not known. The best available quantified information comes from MEPLAN, which estimates that both Alternatives 1 and 5 would result in an increase of approximately 0.4 percent in households and a 0.6 increase in jobs in the study area in 2040 when compared to the No-Build Alternative. Making some assumptions about density and floor-area-ratios, these numbers could be translated into acreage, and be added to the cumulative impact acreages, as the commenter suggests. Given that the entire land within the corridor alignment alternatives are counted as impacted, which is likely to be conservative (since at least Pleasant

EPA'S DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE TIER 1 PLACER PARKWAY CORRIDOR PRESERVATION PROJECT IN PLACER AND SUTTER COUNTIES, CALIFORNIA. SEPTEMBER 25, 2007

### Section I: Integration of Clean Water Act and National Environmental Policy Act Requirements

The Federal Highway Administration (FHWA) and the South Placer Regional Transportation Authority (SPRTA), the project sponsor, are using a tiered process for the National Environmental Policy Act (NEPA) analysis of the proposed Placer Parkway project. The goal for this Tier 1 (programmatic) Environmental Impact Statement (EIS) is to identify a corridor for future right-of-way preservation. The Tier 2 (project-level) EIS will identify a specific alignment for the Parkway within the corridor(s) identified in Tier 1. After Tier 2 project approval, but before project construction, the project proponent will need to obtain a Clean Water Act (CWA) Section 404 individual permit from the Corps.

The CWA Section 404(b)(1) Guidelines (Guidelines) are binding, substantive regulations that restrict CWA Section 404 permits to the "least environmentally damaging practicable alternative (LEDPA)." The Corps cannot grant a CWA Section 404 permit to a preferred project-level alternative that is not the LEDPA; therefore, it is critical that the LEDPA is not prematurely eliminated during the Tier 1 NEPA review.

In 2004 the FHWA, California Department of Transportation (Caltrans), the Placer County Transportation Planning Agency (on behalf of SPRTA), U.S. Army Corps of Engineers, and U.S. EPA Region IX agreed to follow a NEPA/CWA Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU) – modified for Tier 1 decision making – as the framework to guide the environmental review of the programmatic, Tier 1 Placer Parkway project.<sup>1</sup> The goal of the modified NEPA/404 MOU process is to ensure that Tier 1 decisions reflect careful consideration of the Guidelines. The Guidelines should be addressed as early as possible in the Tier 1 NEPA evaluation to eliminate the need to revisit decisions at the Tier 2 project-level that might otherwise conflict with CWA 404 permit requirements.

EPA has agreed with the first three checkpoints in the NEPA/404 MOU process – the purpose and need, criteria for selecting the range of alternatives, and the range of alternatives. The next steps in the process are the following: 1) select the corridor(s) most likely to contain the "least environmentally damaging practicable alternative (LEDPA)" and 2) determine the mitigation framework for the project.

#### Corridor(s) Most Likely to Contain the LEDPA

The Guidelines call for an analysis that compares the total impact – direct and secondary (indirect) – for each alternative. However, the Draft Environmental Impact Statement (DEIS) only includes direct impacts in the comparison of alternatives (e.g., Table 4.14-4). It is important to include indirect, including growth-inducing impacts, in the alternatives

<sup>1</sup> Modified NEPA/404 MOU Integration Process for the Tier 1 Placer Parkway Corridor Preservation Project, April 12, 2004.

Grove Creek would be spanned), adding additional acreage derived from the MEPLAN analysis to the total historic losses (Table G-12 in Appendix G of the PRD), together with estimated impacts from other projects and the Parkway (Table 4), is not warranted, as the amount would be minor in the context of the overall historic losses.

### F-004-034

The Draft Tier 1 EIS/EIR acknowledges that future development in the study area may not adhere to the level and pattern envisaged within the SACOG Blueprint Preferred Scenario. Section 1.4.3.3 states that growth estimates within the Blueprint were underestimated for 2020 and that SACOG has adjusted ongoing planning efforts to reflect this. Section 3.6.1 also acknowledges how future growth in the study area could differ from current projections. Please also see response to Comment B-002-008, which explains how the 2020 and 2040 development scenarios "bracket" regional development levels from a low 2020 level to a high 2040 level, enabling variations in future development levels to be reflected in the environmental analyses.

### F-004-035

The commenter notes that SACOG is developing a more thorough assessment of aquatic resources in the SACOG region. Through the PCCP, Placer County is also developing a more thorough assessment of vernal pool wetlands and uplands.

### F-004-036

The commenter attaches the Modified National Environmental Policy Act/404 process for Placer Parkway and the U.S. Environmental Protection Agency comment letter on the Draft Tier 1 EIS/EIR dated September 25, 2007. Please see Master Response 1 and responses to Comments F-002-002 through F-002-020, which address the September 25, 2007 comments.

analysis, because an alternative with greater direct impacts, but fewer indirect impacts (including growth-related impacts) can qualify as the LEDPA.<sup>2</sup>

**Recommendation**

In order to be consistent with the Guidelines, the alternatives analysis should compare the alternatives using both direct and indirect impacts to environmental resources of concern. Specific recommendations are included below in **Section II-A**.

In addition, when evaluating differences between each corridor, it is important to consider resource avoidance options (e.g., elevated structures, bottomless culverts) that are available *within* each corridor, so as to not prematurely eliminate a potential LEDPA alignment.

**Recommendation**

Include planning-level avoidance commitments in the Tier 1 Final EIS (FEIS) for each alternative that will be considered in the LEDPA assessment, such as arched (bottomless) culverts and elevated roadway structures or spans.

Finally, given the magnitude of potential resource impacts, particularly to aquatic resources, species, and habitat, we recommend that FHWA prepare a robust cumulative impacts analysis at Tier 1 that will 1) determine the resource study area for and the baseline condition of each resource of concern, 2) assess reasonably foreseeable changes to environmental resources over time, and 3) identify potential landscape-level mitigation opportunities.

**Recommendation**

Prepare a thorough cumulative impact analysis to sensitive resources affected by the project. Specific recommendations are included below in **Section II-B**.

**Mitigation Framework**

In the Tier 1 FEIS, FHWA should present the framework it will use to prepare the Tier 2 project-level detailed mitigation plan. The Tier 1 mitigation framework describes the processes that FHWA will use, and commitments it will make, to maximize opportunities for successful mitigation of environmental impacts associated with the construction and operation of the Parkway, including long-term mitigation and management of resources.

**Recommendations**

Identify the following in the Tier 1 FEIS mitigation framework:

- Mitigation options available for creation, restoration, enhancement and preservation (e.g., land dedication, acquisition of conservation easements, in lieu fees for acquisition, mitigation banks).
- Potential mitigation sites.

<sup>2</sup> See Chapter 2.3, Guidance for Preparers of Growth-related, Indirect Impact Analyses.  
[http://www.dot.ca.gov/ser/Growth-related\\_IndirectImpactAnalysis/gri\\_guidance.htm#cwadef](http://www.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/gri_guidance.htm#cwadef)

- Opportunities to build upon existing or planned conservation efforts and to coordinate with other governmental and non-governmental agencies.
- Habitat types and approximate acres of impact. Special status species and critical habitat impacted. Discussion of buffer areas and habitat linkages that will be adversely affected and replaced.
- Institutions and instruments (e.g., established maintenance endowments) for long-term management of mitigation sites.

## Section II: Indirect and Cumulative Impacts Analysis

### A. Indirect and Induced Growth Impacts

The proposed Placer Parkway is a major new freeway in a rural area with abundant aquatic and biological resources, and large areas of undisturbed habitat. The DEIS recognizes that the proposed project will not only have significant direct impacts on these resources, but also that the project will be growth-inducing in southwestern Placer County and southern Sutter County. The growth-inducement associated with the Placer Parkway will likely have significant adverse impacts to sensitive aquatic and biological resources, including habitat.

We commend FHWA for the recognition of indirect impacts, particularly growth inducement, as a major issue for the project, and for FHWA's objective to avoid unplanned growth in environmentally sensitive areas. EPA is concerned, however, that the DEIS does not contain an estimate, by alternative, of indirect impacts to sensitive environmental resources; and does not sufficiently describe and commit to measures that avoid and minimize growth-inducing impacts.

EPA also has major concerns about the assumption, used throughout the DEIS, that the "no-development buffer concept" will prevent interchanges additional interchanges on and growth near the Parkway.

#### i. Methodology and Scope of Analysis of Indirect Impacts

The DEIS concludes that the project will be growth-inducing. The next step in the indirect impact analysis is to assess the impacts to resources of concern and compare them by alternative. Caltrans has recently completed guidance, in concert with EPA and FHWA, to analyze growth-inducing indirect impacts of projects. We recommend using this guidance to determine the anticipated location of and quantify growth-inducing impacts the Final EIS.

The DEIS states that it is "not feasible to perform a detailed quantitative evaluation of these [indirect and secondary] potential impacts as specific design details of other future projects are not known," and that the effects are evaluated qualitatively. EPA believes that a more detailed qualitative and quantitative analysis of indirect impacts, especially induced growth impacts, to resources of concern can be provided in the FEIS. Detailed information exists for several major developments in the study area, including CWA jurisdictional delineations for Placer Vineyards, Curry Creek, Placer Ranch, and Sierra Vista specific plans. Additional delineations may be available prior to the FEIS. Placer



County and other agencies have compiled detailed information on resources in the area that is readily available in a Geographical Information System (GIS) format.

The DEIS states that it is unlikely that the growth-inducing impacts of the project would differ from one alternative to another (Section 6.1.4) but does not provide data to support this conclusion. The potential growth-inducing impacts of the alternatives could vary significantly, depending on the location of the corridor, the interchanges, and their proximity to existing development. The northerly alternatives provide access to largely undeveloped areas facing intense development pressures, including areas around Sunset Boulevard West. The southerly routes provide access closer to existing and planned urban development. Corridor alternatives and interchange locations that direct growth to southern rather than northern areas of Western Placer County would likely have fewer growth-related impacts to environmental resources and result in less habitat fragmentation.<sup>3</sup>

#### **Recommendations**

Prepare a robust qualitative and quantitative analysis of indirect impacts -- including habitat fragmentation and growth-related impacts to environmental resources -- for each alternative, and provide supporting data:

- Use readily available quantitative information, such as Geographical Information System (GIS) databases and verified CWA delineations to prepare a quantitative estimate of secondary and indirect impacts. Include information from jurisdictional delineations for Placer Vineyards, Curry Creek, Placer Ranch, and Sierra Vista specific plans. Additional delineations may be available prior to the FEIS. Placer County and other agencies have compiled detailed digitized resource information in the area that is readily available.
- Use the Caltrans' Growth Related Indirect Impacts Guidance to analyze the potential growth-inducing impacts of the project and to compare alternatives. It is available at [http://www.dot.ca.gov/ser/Growth-related\\_IndirectImpactAnalysis/gri\\_guidance.htm](http://www.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/gri_guidance.htm).
- Present a quantitative estimate of indirect impacts on each alternative in tabular form in Table ES-1. Also, provide a map overlaying aquatic and terrestrial resources and habitat boundaries with areas of existing and anticipated (planned and reasonably-foreseeable) growth.

#### **ii. Implementation of a "No-Development Buffer Concept"**

FHWA has proposed a 500-1,000 foot "no-development buffer concept" to prevent development and additional interchanges along the Placer Parkway. The DEIS states that this buffer would severely constrain growth-inducement from the Parkway project by preventing new access on the freeway, beyond the four to five planned interchanges. EPA

<sup>3</sup> For information on how the location of a transportation facility can influence and direct growth, see Chapter 5, Guidance for Preparers of Growth-related, Indirect Impact Analyses; National Cooperative Highway Research Program (NCHRP) Report 423A, Land Use Impacts of Transportation: A Guidebook; and NCHRP Report 466, Desk Reference for Estimating the Indirect Effect of Proposed Transportation Projects.

believes that the DEIS has not demonstrated that the “no-development buffer concept” would prevent additional interchanges and development within 500-1,000 feet of the roadway.

First, the DEIS states that “adjustments” to the buffer could be made at Tier 2 to accommodate “future approved development.” These adjustments would allow development to the edge of the roadway (Section 2.2.4). In addition, the buffer could be created on just one side of the parkway, leaving the other side available for near roadway development. Given these qualifications to the buffer concept, EPA believes it is misleading to state that the buffer would prevent development near the roadway.

Second, the DEIS does not include assurances that the buffer would be successful in preventing additional interchanges and development near the roadway. The DEIS does not include an implementation plan or timeframe for adopting, implementing, and ensuring long-term effectiveness of a buffer. While the DEIS contains a list of potential land use controls (Section 2.2.4.2), it does not state how and when these measures will be implemented, or how likely they are to succeed. We recognize that FHWA does not have land use authority, and that an effective buffer will require land use decisions by parties other than FHWA. However, the FEIS should state whether relevant parties have agreed to implement measures to prevent development and interchanges on the Parkway, whether the public supports these changes, and whether funding is available to implement them. We recognize that measures could be particularly challenging to implement given the development pressure in southwestern Placer County.

If the buffer were able to prevent additional interchanges on the Parkway, the buffer could have environmental benefits by reducing access to areas with sensitive environmental resources. A 500-1,000 foot buffer could also provide public health benefits by minimizing air toxics impacts to residents and sensitive receptors. We note, however, that a “buffer” along the roadway edge would not be likely to provide habitat benefits, as suggested in the DEIS, since the roadway itself could significantly fragment habitat.

Finally, it appears that the boundaries of the “Central Segment” of the freeway in the DEIS have shifted approximately two miles west, as compared to previously adopted maps.<sup>4</sup> This change would appear to remove approximately two miles of roadway (from the Western Regional Sanitary Landfill Expansion Area to the potential Watt Avenue extension) from the no-development buffer area, providing no constraints on new interchanges in an undeveloped area facing considerable development pressure.

***Recommendations***

Describe and commit to a specific buffer implementation plan that will prevent development near the Parkway and interchanges in the Central Segment. Identify the following:

- specific actions that will be implemented and committed to by FHWA and/or other parties, such as easements and/or deed restrictions

<sup>4</sup> [http://www.pctpa.org/placerparkway/library/5Corridor\\_Align\\_Alts\\_Tier1EIS-EIR\\_09-28-05.pdf](http://www.pctpa.org/placerparkway/library/5Corridor_Align_Alts_Tier1EIS-EIR_09-28-05.pdf)

- responsible parties
- agreed-upon timeframes for completion of specific actions
- specific sources of funding that will be used to prevent near-roadway development and Central Segment interchanges on the Placer Parkway

If such an implementation plan cannot be provided in the Tier 1 FEIS and committed to in the Record of Decision, the Tier 1 FEIS should revise the induced growth analysis to reflect resource impacts that are likely to occur without an assured 500-1,000 foot buffer zone.

Clarify how the boundaries of the freeway segments have changed since EPA's agreement with the range of alternatives for the project (February 16, 2006). Discuss the rationale for expanding the Eastern Segment approximately 2 miles west to the potential Watt Avenue extension. Discuss the potential for additional interchanges in this area, and potential for increased growth-related impacts to environmental resources.

Include quantitative estimates of the indirect impacts, including induced growth impacts, of each alternative in tabular form in Table ES-1 or other summary impact matrix.

### iii. Habitat Fragmentation

The DEIS does not adequately address adverse impacts associated with habitat fragmentation from proposed alignments and/or growth adjacent to the Parkway. All proposed Placer Parkway alignments move through a large intact landscape of aquatic and upland habitat. Important natural resources in this landscape include vernal pool grasslands, wetlands, riparian corridors, and stream habitats. These resources provide habitat for federal- and State-listed endangered and threatened species, species of special concern, and other fish and wildlife integral to ecosystem balance and function. Fragmenting these habitats with large urban infrastructure such as a new freeways and/or urban development exposes the remaining resources to myriad adverse impacts associated with isolation in a matrix of urban and suburban developments. At the same time, fragmentation precludes management options that mimic natural disturbance such as burning and grazing needed to maintain health, biodiversity, and productivity of these natural landscapes. Impacts to aquatic resources and endangered species habitat should be estimated for each of the proposed alignments and presented in a summary impact matrix in the FEIS.

#### ***Recommendations***

Include an assessment of potential aquatic and terrestrial habitat fragmentation for each alternative corridor.

Compare the potential impacts of habitat fragmentation by alternative.

### iv. Indirect Impacts of Interchanges

EPA is concerned that the DEIS analyzes only the direct footprint of the interchanges but does not include the indirect impacts. In order to determine the corridor(s) most likely to

contain the LEDPA, the analysis should include both direct and indirect impacts. New interchanges provide access and can facilitate growth, particularly in rural areas that are facing development pressure. The location of interchanges can direct growth to areas that may contain sensitive resources. Given the abundance of aquatic resources, open space, habitat, and farmland, the FEIS should identify not only the direct impacts, but the secondary and indirect impacts, including growth-inducing impacts of the interchanges (including a potential Watt Avenue Interchange).

In addition, the DEIS does not explain why the wetland preserve affected by the Watt Avenue Interchange Option 2 is "outside the scope of this study." If the interchange is part of the proposed project and has direct or indirect impacts on the preserve or other resources of concern, it is within the scope of the project study (40 CFR 1508.8).

***Recommendations***

Analyze both the direct and indirect impacts of project interchanges, including all potential Watt Avenue Interchanges and options.

Include the estimated indirect impacts of interchanges, including habitat fragmentation and growth-inducing impacts, in the analysis of the corridor(s) most likely to contain the LEDPA.

***v. Additional Interchanges***

The DEIS states that there will be no additional interchanges in the Central Segment. Since a proposed Watt Avenue Interchange is reasonably foreseeable, the FEIS should clearly state that there is likely to be at least one additional interchange – Watt Avenue Interchange – in the Central Segment. Further, given development pressures, other parties may propose to build interchanges in the Central Segment. For example, there could be "enormous pressure on the county to create one or more connections from the parkway to serve the [planned Regional] university."<sup>5</sup> Finally, part of the Central Segment has been reclassified as the Eastern Segment (see Section II-A-ii above), which would have no apparent constraints to additional interchanges.

***Recommendation***

Clearly state that there is likely to be at least one additional interchange – Watt Avenue Interchange – in the Central Segment. Given development pressure, especially in the Eastern and Central Segments, discuss the potential that others would seek to build additional interchanges on the Parkway.

**B. Cumulative Impacts Analysis**

The DEIS includes a brief qualitative discussion of cumulative impacts for each resource area. Given the rapid urbanization in the area, we strongly recommend a more comprehensive analysis of cumulative impacts to resources of concern. We recommend using the Caltrans guidance on Cumulative Impact Analysis, co-developed by FHWA and U.S. EPA Region 9, as a framework.

<sup>5</sup> Placer university land gift could net developer hundreds of millions. Sacramento Business Journal, March 2003, by Mike McCarthy.

The Council on Environmental Quality's regulations implementing NEPA define cumulative impact as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (40 CFR 1508.7)

For example, aquatic resources in western Placer County have been cumulatively affected by past actions and are likely to be adversely impacted by future development, including the proposed parkway. Historical impacts on aquatic ecosystems include California's rapid population growth and resulting losses of approximately 95% of the State's wetlands (Dahl, T.E., 1990) and up to 85% (Holland, Robert, 1978) of the vernal pools. According to estimates provided by the Placer County Planning Department, there are approximately 20,000 acres of vernal pool grassland habitat remaining in the western part of Placer County, a small fraction of historical distribution. The majority of this vernal pool habitat is located on private lands and vulnerable to permanent removal. Proposed development projects in western Placer County threaten at least half of these unprotected vernal pool grassland habitat areas. These projects include, but are not limited to the following: Placer Vineyards, Creekview, Sierra Vista, Placer Ranch, Riolo Vineyards, Regional University, Brookfield, Curry Creek, expansion of the western regional landfill, and portions of the City of Roseville's Retention Basin property.

We also recommend a robust cumulative analysis at Tier 1 because it allows FHWA and other stakeholders to identify early opportunities to avoid and minimize cumulative impacts to resources, and to identify landscape-level opportunities able to protect or restore environmental resources that may be cumulatively at risk.

#### *Recommendations*

Include a more robust cumulative impact analysis in the FEIS. The Caltrans Cumulative Impact Guidance is a useful reference and is available at the following site: [http://www.dot.ca.gov/ser/cumulative\\_guidance/approach.htm](http://www.dot.ca.gov/ser/cumulative_guidance/approach.htm)

Identify potential landscape-level opportunities to avoid, minimize, and mitigate cumulative impacts to resources of concern, including those that are outside of FHWA's authority. Specifically, in the FEIS, provide resource avoidance guidance for the preparation of the Tier 2 environmental documentation and identify measures that can be accomplished early, before the Tier 2 environmental review process is required.

#### **Section III: Resource-Specific Comments**

In addition to the major concerns listed above, we have resource-specific concerns regarding: A) hydrology, floodplains, and water quality, and B) air quality.

**A. Hydrology and Floodplains, and Water Quality**

EPA supports project elements, such as bridges and spans that would avoid environmental impacts. The DEIS states that, "As necessary, bridges would be used to span certain features and improvements such as...floodplains." (2.2.2) and that "[w]here creek crossings coincide with floodplain crossings, the road would be elevated on a bridge." The DEIS also states that "Culverts would be used at smaller creek crossings as appropriate depending on local conditions and permit requirements." We recommend that the Tier 1 FEIS include commitments to use avoidance features such as bridges, spans, and arched or bottomless culverts.

The description of the realignment of Steelhead Creek is unclear. For example, Corridor 1 is stated to cross 7,000 feet of Steelhead Creek longitudinally (page 4.11-15) potentially requiring realignment of Steelhead Creek that could cause substantial adverse impact to the resource. It is unclear from the DEIS whether all roadway alignments in the corridor would require 7,000 feet of creek realignment, or whether there would be opportunities to reduce the amount of creek realignment through the location of roadway alignments and/or additional avoidance measures.

A commitment to avoid impacts associated stream crossings using design options such as elevated structures and bottomless culverts are important aspects of identifying the alternative corridor(s) most likely to contain the LEDPA.

**Recommendations**

Include in the FEIS a description of which floodplain areas would likely be spanned as part of the Placer Parkway project, including a map of the elevated structures over the floodplain and an estimate of elevated road distances.

Provide information on how the creek realignment in Corridor 1 could be avoided or minimized.

Include in the FEIS a commitment to use measures to avoid resource impacts. In particular, commit to the following:

- Use newer technology culverts and less damaging culverts such as large bottomless or arched culverts.
- Span floodplains and major creek crossings to avoid impacts to aquatic resources.

The DEIS states that there are no streams within the Natomas Basin. We recognize that many natural streams in the Basin have been straightened and channelized in portions, but not for their entire courses. In Figure 2-2 the outside slope from roadway corridor to roadway buffer is shown as being a ratio of 4:1. The DEIS does not include a discussion of how the slope will be stabilized or maintained (e.g., vegetation or rock slope protection). Stabilizing slopes with native vegetation is recommended especially if this part of the roadway is built in waters of the U.S. Less steep slopes are preferred for long-term maintenance and reduction of potential future impacts to waters of the U.S. that could occur from steep slopes slumping into waterways.

**Recommendations**

Clarify the extent of streams and canals in the Natomas Basin.

Include a discussion of how the 4:1 slope from the roadway corridor to roadway buffer will be stabilized; and the feasibility of less steep slopes.

Ensure consistency with the Executive Order 13112 on Invasive Species. Include a commitment to use native vegetation and to reuse native soils in re-vegetation.

Add CWA Section 404 to the bulleted list of federal regulations applicable to hydrology and floodplains. (4.11.1.1)

**B. Air Quality****i. Mobile Source Air Toxics**

EPA commends FHWA for including a discussion of Mobile Source Air Toxics (MSAT) in the Tier 1 document. While this project is being constructed in a rural area, a large number of residential developments are planned in proximity of the Parkway. Many recent studies have examined the association between living near major roads and different adverse health endpoints. Several well-conducted epidemiologic studies have shown associations with cardiovascular effects, premature adult mortality, adverse birth outcomes, including low birth weight and size, and asthma-related respiratory symptoms in children. Several MSATs are classified as known and likely human carcinogens. Many studies have measured elevated concentrations of pollutants emitted directly by motor vehicles near large roadways. These elevated concentrations generally occur within approximately 200 meters of the road, although the distance may vary depending on traffic and environmental conditions. (See [www.epa.gov/otaq/toxics.htm](http://www.epa.gov/otaq/toxics.htm).)

Interim guidance on MSAT analysis for transportation is available from FHWA (February 2006). However, EPA disagrees with aspects of the guidance, including the use of a 150,000 annual average daily traffic (AADT) threshold for MSAT impacts. Traffic levels well below that threshold can result in public health impacts (Cal-EPA/CARB 2005) depending on proximity to the roadway.

We support the DEIS's use of the *Air Quality and Land Use Handbook: A Community Health Perspective, April 2005* (Cal-EPA/CARB, 2005) as a resource for assessing the potential MSAT impacts. The Handbook reflects recent science on near-roadway air impacts. The project's proposed 500-1,000 foot buffer, if achievable, would be consistent with the California Air Resources Board (CARB) recommendations for minimizing MSAT impacts of a highway with projected volumes of the Placer Parkway. The March 2007 report entitled "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process" conducted for the American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment and funded by the Transportation Research Board ([http://www.trb.org/NotesDocs/25-25\(18\)\\_FR.pdf](http://www.trb.org/NotesDocs/25-25(18)_FR.pdf)) contains additional guidance on assessing MSAT emissions. In addition, procedures for toxicity-weighting, which EPA has found to be especially useful for the targeting of mitigation, are described in EPA's

Air Toxics Risk Assessment Reference Library. EPA is available to work with FHWA to evaluate the appropriate level of MSAT analysis for this project in Tier 2.

**Recommendations**

EPA recommends performing an analysis of potential MSAT impacts in Tier 2 to inform decision-making and avoidance, minimization, and mitigation options. When considering appropriate and useful levels of analysis, EPA recommends that the lead agency consider the following:

- The likelihood of and potential magnitude of the effect, including both the magnitude of emissions and their proximity to potential residential and sensitive receptors (e.g., schools, hospitals, day care facilities, and nursing homes);
- The severity of existing conditions;
- Whether the project is controversial and whether air toxics concerns have been raised by the public for this project or for other projects in the area in the past;
- Whether there is a precedent for analysis for projects of this type; and
- Whether the analysis could be useful for distinguishing between alternatives, informing design changes, and targeting mitigation.

ii. New 24-hour federal standard for PM2.5

Tables 4.9-1 incorrectly states the federal 24-hour National Ambient Air Quality Standard (NAAQS) for fine particulate matter with a diameter of 2.5 microns or less (PM2.5) as 65 micrograms per cubic meter (ug/m3). In December 2006, the revised 24-hour standard of 35 ug/m3 for PM2.5 became effective. While EPA has not yet designated areas as non-attainment for the new 24-hour standard for PM2.5, the FEIS should include the most recent monitoring data and assessment of potential PM2.5 impacts.

**Recommendation**

Correct the federal standard for 24-hour PM2.5 and include the most recent monitoring data and assessment of potential PM 2.5 impacts in the Final EIS.

**SECTION IV: OTHER COMMENTS**

**A. Hypothetical Smart Growth Scenario**

As part of the Tier 1 modified NEPA/404 MOU process, FHWA agreed to prepare a hypothetical Land Use and Policy – smart growth – scenario that would meet traffic demand without building a Parkway (FHWA letter to EPA, January 18, 2006). The analysis would incorporate tools to meet anticipated demand without a new freeway, even those that are outside the authority of the project sponsors or would require actions by municipalities or decision makers outside the Placer Parkway study area.

The NEPA/404 MOU partners agreed that this hypothetical scenario would not be a reasonable alternative for purposes of NEPA analysis. However, the scenario would illustrate to the public and decision makers the type and combination of activities that a



region might adopt to meet transportation demand in a rapidly growing area without building new freeways.

In the Mineta Transportation Institute Report 04-02<sup>6</sup>, authors Johnston, Gao, and Clay demonstrate that a set of policy and land-use changes could be implemented within the SACOG region that would reduce vehicle miles traveled without building new freeways. This study includes policies such as fixed urban growth boundaries, increased transit, and pricing tools, such as gasoline taxes and parking fees. The scenarios in the study went beyond the assumptions made in current plans and the SACOG Blueprint Preferred Scenario.

The Land Use and Policy Scenario in the DEIS limits analysis to assumptions in current transit plans and the SACOG Blueprint, which includes two new freeways. In order to accomplish the goal of the Land Use and Policy Scenario (Section 2.6), FHWA would need to include transit, pricing, and smart growth tools that go beyond the assumptions made in current plans and the SACOG Blueprint, even if their implementation is speculative or funding is not available.

***Recommendation***

Revise the assumptions in the analysis as needed (e.g. urban growth boundaries, increased densities, congestion pricing, additional transit, etc.) to accomplish the goal of the hypothetical Land Use and Policy Scenario.

**B. State Route 65 Auxiliary Lanes**

Section 2.2.3.3 describes the ultimate configuration of the Placer Parkway/State Route (SR) 65 connection. It appears that the auxiliary lanes at State Route 65 are necessary for the full operation of the Placer Parkway, but they are not clearly identified in the DEIS as either part of the project or a connected action (40 CFR 1508.25(a)). It is unclear whether the environmental impacts of the auxiliary lanes on State Route 65 are included in the impact assessment for the Placer Parkway.

***Recommendation***

Include the direct and indirect impacts of all components of the project and connected actions, including the auxiliary lanes on SR 65, in the FEIS. Revise estimates of impacts to resources, as appropriate, and provide additional mitigation opportunities.

<sup>6</sup> Johnston, Gao, Clay (2005). Modeling Long-Range Transportation and Land Use Scenarios for the Sacramento Region, Using Citizen-Generated Policies. Mineta Transportation Institute Report 04-02. <http://transweb.sjsu.edu/mtportal/research/publications/summary/0402.html>

## Response to Comment F-004-003

### DEVELOPMENT RESTRICTIONS IN FLOODPLAINS

Updated 4/15/09

The Additional Analysis of Growth Inducement Potential (Attachment A) prepared as part of the Placer Parkway Corridor Preservation Project Least Environmentally Damaging Practicable Alternative (LEDPA) Recommendation Concurrence Request considered the 100-year floodplain in the study region to be constrained from future urban development. The mapped 100-year floodplain areas were eliminated from consideration as lands that were both undeveloped and unconstrained, and therefore "potentially developable." Resource agency staff requested additional information on development constraints in floodplain areas, as well as reconsideration of the potential for urban development to occur in these areas within the study time frame.

#### Background

Low-lying portions of the study region are protected from flooding primarily by levees that were built as part of the Sacramento River Flood Control Project, which was authorized by the Flood Control Act of 1917 as modified by the Acts of 1928, 1937, and 1941 (FEMA, 2008). The U.S. Army Corps of Engineers (USACE) certified the levees that protect the Natomas Basin in 1998. In July 2006, following Hurricane Katrina, USACE stated that, based on new standards and new information, they could no longer stand behind their previous certification of the levees along the Sacramento River. When no other agency stepped forward to certify the levees, the Federal Emergency Management Agency (FEMA) determined that they would have to revise their flood hazard maps accordingly. In 2008, FEMA prepared new flood hazard maps for the Natomas Basin that designate the entire basin as AE, or the highest possible flood hazard rating (having less than 33-year flood protection). FEMA now requires that all provisions of the federal National Flood Insurance Program be adhered to by participating local governments in AE areas—including a prohibition to permit any new development activity to occur in the 100-year floodplain in rural areas, or in the 200-year floodplain in urban areas (Buer, 2008b).

On October 10, 2007, Governor Schwarzenegger signed a package of flood protection legislation into law to strengthen flood protection in California. The package included Assembly Bill (AB) 156, Senate Bill 5, AB 162 and three other pieces of legislation aimed at agency reform, local flood protection planning, and funding for flood control projects. AB 162 addresses flood protection issues by requiring local governments to look at current flood hazard maps, even though they are not yet "official," develop 5-year flood protection plans, and begin making appropriate revisions to general plans, including Housing, Safety, and Conservation Elements. (See attached press release for an overview with links.) SB 5 addresses the longer term situation, requiring the State Department of Water Resources and the Central Valley Flood Protection Board to prepare and adopt a regional Flood Protection Plan by 2012 and requiring local government jurisdictions to make land use decisions consistent with that Flood Protection Plan, changing General Plans and zoning as necessary to comply with new flood protection requirements (Schwarzenegger, 2007; Treabess, 2008).

#### Current Floodplain Development Situation

Since the new FEMA floodplain hazard maps were finalized in December 2008, no new development activity has been allowed in the 100-year floodplain in rural areas and in the 200-year floodplain in urban areas—defined as areas having a population greater than 10,000 (Buer, 2008; Treabess, 2008). Residential and commercial development activity in the Natomas Basin is at a halt at present, in part because of current real estate market conditions, but also because of uncertainties introduced by recent legislation and flood hazard map revisions (Wilson, 2008; Roberts, 2008). Some construction projects are

proceeding in the Natomas Basin, but these are infrastructure projects such as airport improvements, new sewer or water line construction, and levee improvements (Marr, 2008; Roberts, 2008).

New construction can be permitted in floodplain areas as long as certain criteria are met. For residential development, homes must be elevated at least one foot above the base flood elevation. For commercial development, buildings must be either elevated or waterproofed to one foot above base flood elevation. In the Natomas Basin, however, the base flood elevation has been determined by FEMA to be 33.1 feet. Since native soils range from 10 to 20 feet, this requirement to elevate the structures would be prohibitively expensive. Thus, no new development is likely to take place until after the Natomas Levee improvements have been completed, at which time FEMA may revise flood risk maps to reflect the greater level of protection provided by the improved levees (Peterson, 2008). Natomas levee improvements are expected to be completed by 2011 or 2012, although there are considerable risks that could affect the schedule and or costs associated with this program (Buer, 2008a).

### **Immediate Future Implications for Development**

Local government jurisdictions have had to respond to the new flood risk maps and flood protection legislation by drafting flood protection ordinances. Once these are adopted, changes will be made to local General Plans (including Housing, Conservation, and Hazard Elements, as well as local grading ordinances and zoning) to conform to the new flood protection requirements. Sutter County's new Flood Protection Ordinance was adopted and went into effect in October 2008, prohibiting construction in flood hazard areas. It is likely that the proposed Sutter Pointe development will proceed in several years, once the Natomas levee repairs are completed and the Natomas Basin flood risk rating is revised (Peterson, 2008 and 2009; Wilson, 2008). Additional development in this area is unlikely, because of restrictions associated with the Natomas Basin Habitat Conservation Plan (NBHCP), as described below.

Future development in floodplains will be discouraged further by new requirements and expenses, including mandatory flood insurance and new development impact fees. On May 15, 2008, the Sacramento Area Flood Control Agency approved a special development impact fee that will apply to all new construction in flood hazard areas. Funds from this development fee—estimated to be around \$4,500 for each new dwelling unit built—will be used to help pay for needed levee repairs (Washburn, 2008).

Although the current floodplain and flood risk maps can be revised after levee improvements or dam projects are completed, after 2012 it is anticipated that a new statewide flood protection plan will be completed as required under SB5. The future implications of such a plan for development activity in floodplains are unknown at this time, but it is likely to make such development more difficult.

Placer County has become more vigilant in recent years about controlling development in floodplain areas, as indicated in their Comment Letter L-014.

### **Longer-Term Implications for Development**

The challenge for the Placer Parkway project is to determine the reasonable likelihood of urban development being permitted in floodplain portions of the project study area in the future, particularly the project study period (to 2040). Most of the mapped 100-year floodplain areas lie in Sutter County, in and around the Natomas Basin, and extending into Placer County mainly along the Curry Creek and Pleasant Grove Creek watersheds.

Floodplain acreages associated with the entire one-mile study area for each Placer Parkway corridor alignment alternative are shown on Table 1, for both variants A and B. The amount of floodplain within one mile of the alignment is least with Alternative 1 (1,313.4 acres under Variant A, 1,469.7 acres under

Variant B) and most with Alternative 5 (3,658.7 acres under both variants). As the table shows, approximately half (45 to 64 percent for Variant A and 45 to 58 percent for Variant B) of all floodplains in question lie within the Natomas Basin. The remaining floodplain areas are divided roughly equally between south Sutter County and southwestern Placer County. The discussion below addresses the likelihood of future urban development occurring in mapped floodplain areas in the study time frame in three subareas:

- the Natomas Basin in south Sutter County
- south Sutter County floodplains outside the Natomas Basin
- Placer County floodplain areas

### **Natomas Basin Floodplain Development**

Unplanned development within the Natomas Basin is unlikely to occur within the project time frame because of the stringent protections offered by the NBHCP. The multi-jurisdictional agreement guiding development and conservation lands within the Natomas Basin is very protective and has withstood multiple legal challenges in recent years (Marr, 2008; Roberts, 2008).

The Natomas Basin HCP anticipates that development by the City of Sacramento and Sutter County will be limited to 15,517 acres—8,050 acres within the City and 7,467 acres in Sutter County. Judge David Levi, in his 2005 U.S. Federal Court decision, described the “high hill” standard that any future development proposal affecting the Natomas Basin outside the authorized development areas will face. Approval of any development beyond the authorized amounts, whether by the City or County or by other entities, will trigger reevaluation and possible amendment of the plan, and could result in suspension or revocation of the City and Sutter permits (NWF vs. Norton, 2005).

As the authorized development occurs, conservation lands must be purchased and conserved at a rate of 0.5 acre for each acre that is developed. Mitigation fees are permitted to escalate (without cap) if the cost of conservation lands increases in the future.

All of the 7,467 acres of authorized development in the Sutter County portion of Natomas Basin will be absorbed by the Sutter Pointe development. Of the remaining Sutter County land in Natomas Basin, 2,414.5 acres are in conservation, and it is likely that most of the remaining conservation lands to be preserved as development progresses will be located in Sutter County. Large blocks of conservation lands throughout the basin will make it difficult to assemble land for future urban development. Other disincentives to development include requirements for flood insurance and special floodplain development impact fees. In addition, much of the remaining land in Natomas Basin is constrained by airport flight zones, Swainson’s hawk nesting areas, and giant garter snake habitat.

It is likely that a different biological opinion would have to be rendered, or conservation lands within Natomas Basin exchanged for better mitigation lands elsewhere for any development to proceed in unauthorized areas (Roberts, 2008; Levi, 2005). Therefore, it is not likely that any development will occur in the floodplain areas of Natomas Basin in the project study period.

### **Study Area Floodplains Outside Natomas Basin**

The floodplain portions of the study area that lie outside of the Natomas Basin are split between unincorporated Sutter County and unincorporated Placer County and lie primarily along the Curry Creek and Pleasant Grove Creek watersheds. These areas are not protected by levees like the Natomas Basin;

rather, they are subject to annual flooding from heavy rainfall events. The floodplain in this area typically consists of a floodway and floodway fringe. The floodway includes the actual stream channel plus adjacent areas that must be kept free of encroachment to carry floodwaters. The floodway fringe is defined as the area that lies between the floodway and the 100-year floodplain boundary. While development is not encouraged anywhere in the floodplain, FEMA acknowledges that development is possible in the floodway fringe (FEMA, 2008). Such development would be subject to requirements of the National Flood Insurance Program, including elevation above the base flood elevation, anchoring, waterproofing, flood insurance, and analysis demonstrating that the development would not adversely affect the rest of the floodplain. As long as these criteria are met, local jurisdictions have the right to allow such development (Peterson, 2008; Marik, 2008).

It is considered unlikely that urban development will be approved in the mapped 100-year floodplain areas outside Natomas Basin. Both Sutter and Placer counties have floodplain management policies, are participants in the National Flood Insurance Program, and also participate in FEMA's voluntary Community Rating System. Both counties are in the process of updating local flood ordinances as required by the state. These revised ordinances are not yet available for public review, but given recent legislative trends and pressure from both federal and state agencies, it is probable that the revised ordinances will be more restrictive, rather than more lenient, with regard to approving development in the 100-year floodplain. FEMA and the Department of Water Resources (DWR) developed a California Model Floodplain Management Ordinance for use by local jurisdictions. The ordinance includes a mandatory section stating purpose and goals as follows:

It is the purpose of this ordinance to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas by legally enforceable regulations applied uniformly throughout the community to all publicly and privately owned land within flood prone, mudslide [i.e. mudflow] or flood-related erosion areas. These regulations are designed to:

- A. Protect human life and health;
- B. Minimize expenditure of public money for costly flood control projects;
- C. Minimize the need for rescue and relief efforts associated with flooding and generally undertaken at the expense of the general public;
- D. Minimize prolonged business interruptions;
- E. Minimize damage to public facilities and utilities such as water and gas mains; electric, telephone and sewer lines; and streets and bridges located in areas of special flood hazard;
- F. Help maintain a stable tax base by providing for the sound use and development of areas of special flood hazard so as to minimize future blighted areas caused by flood damage;
- G. Ensure that potential buyers are notified that property is in an area of special flood hazard; and
- H. Ensure that those who occupy the areas of special flood hazard assume responsibility for their actions.

An independent panel of flood and flood management experts hired by DWR to recommend ways to address the significant flood risks in "deep floodplains" in the Central Valley (defined as floodplains where the level of flooding is 3 feet or more) noted that the state must protect those already living behind

levees, but “the state must also take action to restrict development in high-hazard areas where current population densities are low. Additional development in these areas will simply put more people at risk and create an ever-escalating demand for additional flood damage reduction structures with high economic, societal and environmental costs” (IRP-DWR, 2007).

When the new Central Valley Flood Protection Plan is completed in 2012 as required by SB5, local jurisdictions will be required to comply with it (Treabess, 2008). The implications of this plan for development activity in floodplains are unknown at this time, but there are indications that the state is likely to require local governments to take more rigorous actions to reduce and prevent flood hazards. Thus, it appears likely that federal and state pressure on local government entities to make sensible planning decisions that avoid or reduce flood risks to will continue.

### **South Sutter County Floodplain Areas**

Future development in south Sutter County floodplain areas is constrained not only by requirements to elevate or waterproof above base flood elevation, but also by numerous other factors mentioned in the growth-inducement analysis completed for the Placer Parkway EIS/EIR, including 80-acre minimum agricultural zoning, giant garter snake habitat (including Area B approved for future Natomas Basin HCP conservation areas if suitable habitat is not located within the Natomas Basin boundaries). Land formerly within the Sutter County Industrial Reserve area will revert to agricultural designations once the Sutter Pointe development is entitled, and there is little sign of land assembly activities by developers in these areas (Wilson, 2009).

### **Placer County Floodplain Areas**

Most of the affected floodplain acreage in Placer County is riparian habitat that floods annually. The City of Roseville is the only community in the United States to achieve Class I status for exceeding FEMA criteria for floodplain management, indicating their very proactive approach to preventing development in floodplain areas (Hornick, 2008). See also the March 16, 2009 comment letter on the Partially Revised Draft EIS/EIR from Placer County (L-014) indicating their commitment to prohibit development in floodplain areas.

### **Conclusion**

After reviewing information pertaining to the floodplain portions of the study area, it seems reasonable to have excluded these areas from consideration as Developable lands, as they are highly constrained by a number of factors, including much more stringent federal- and state-mandated floodplain management requirements, as well as local policy and higher development costs. Given these constraints, and the availability of developable lands in the region that are not similarly constrained, commercial or residential development in floodplain portions of the study area is not considered reasonably foreseeable.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Sacramento Fish and Wildlife Office  
2800 Cottage Way, Room W-2605  
Sacramento, California 95825-1846



In reply refer to:  
81420-2009-TA-0541-1

**MAR 12 2009**

Celia McAdam, Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

Subject: Comments on the Partially Revised Draft Tier 1 Environmental Impact Statement/Environmental Impact Report for the Proposed Placer Parkway Project in Sutter and Placer Counties, California

Dear Ms. McAdam:

This responds to the undated *Notice of Availability for Public Review, Partially Revised Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report for the Placer Parkway Corridor Preservation Project* (DEIS/EIR), received in our office on January 29, 2009.

The U.S. Fish and Wildlife Service (Service) has reviewed the DEIS/EIR and provides the following comments. This Tier 1 EIS/EIR analyzes the environmental impacts associated with the selection of a corridor from five alternative alignments for Placer Parkway (proposed project). Subsequent Tier 2 documents would provide specific onsite analysis of the selected alternative, ultimately resulting in construction of a 6-lane highway project to connect State Highway 99 in Sutter County with State Highway 65 in Placer County. Although not a party to the National Environmental Policy Act (NEPA) (40 CFR Part 1500)/Clean Water Act Section 404 Integration Process MOU (NEPA/404 MOU), as modified for Tier 1 projects, including this proposed project, the Service is providing comments to assist you in your development and review of the proposal, and will not take the place of any formal comments that may be required under provisions of the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.) (Act). In addition, any references to mitigation or compensation of affected habitats in this letter are made pursuant to the NEPA.

**F-005-001**

The Service previously commented on the Draft Tier 1 EIS/EIR in a joint agency letter with California Department of Fish and Game dated September 4, 2007. Among other things, the Service expressed concern about: (1) the cumulative effects of the proposed project and the subsequent habitat loss and fragmentation that will occur as a result of the proposed project; (2)

**F-005-002**



**F-005-001**

The commenter notes that his comments are not made pursuant to future formal comments related to the provisions of the Endangered Species Act of 1973, but rather are related to the National Environmental Policy Act (NEPA). These comments are noted.

**F-005-002**

Please see responses to Comments F-002-004 and F-002-005, which respond to previous U.S. Fish and Wildlife Service (USFWS) comments on cumulative impacts and habitat fragmentation. Please see responses to Comments F-002-006 through F-002-008, which respond to previous USFWS comments related to mitigation. Please see response to Comment F-002-009, which responds to previous USFWS comments on quantitative analysis of secondary and indirect impacts.



- F-005-002** failure to identify meaningful mitigation measures to minimize the direct, indirect, and cumulative effects of the proposed project; and (3) the applicability of a quantitative analysis of project alternatives as it relates to habitat fragmentation and vernal pool species population isolation.
- F-005-003** The Service respectfully disagrees with the following statement in the DEIS/EIR: “The proposed Parkway corridors are not likely to affect the viability of the remaining habitat areas that are potentially occupied by vernal pool branchiopods.” As summarized from our September 4, 2007, letter, vernal pool species are threatened primarily by loss and fragmentation of existing habitat. Vernal pool complexes must be preserved on a landscape level to ensure the persistence of the species that inhabit them. It is essential that large, contiguous areas of uninterrupted vernal pool habitat, including both wetted and upland components, be preserved across the range of vernal pool species. *The Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon* (Recovery Plan) (Service 2005) identifies several factors which should be taken into consideration when identifying areas for conservation of vernal pools species. These include: size, quality, connectivity with other preserved habitat, ease or feasibility of protection, ability to maintain and/or implement effective management, and cost of protection and long-term management. The Recovery Plan states, “Limiting this size of a preserved area or preserving an area geographically isolated from other preserves could preclude the long-term conservation of the species.”, and, “Minor fragmentation of vernal pool habitats may effectively serve as a seed, pollen, and pollinator dispersal barrier between adjacent sites for many of the plants covered by this recovery plan.” The Service recommends that the Final EIS/EIR for the proposed project consider effects to biological resources as significant, and that these considerations be included in the analysis and proposed mitigation for the proposed project.
- The Service respectfully disagrees with the assumption in the DEIS/EIR that the influence of the proposed project is most likely to be limited to within one mile of the future highway. Based on the number of proposed and foreseeable projects in western Placer County, and the access that the proposed project could facilitate to those areas, the Service believes the growth-facilitation effects of the proposed project could extend to a greater area, particularly if efforts are not proposed to prevent future interchanges from being constructed along the alignment. The Service believes that the assumption in the DEIS/EIR that development would not occur in the 100-year floodplain is erroneous in that that development is not prohibited here, just discouraged.
- F-005-004**
- F-005-005** The Service supports and recommends that the Federal Highway Administration, the California Department of Transportation, and the South Placer Regional Transportation Authority incorporate measures to avoid or minimize effects to vernal pool habitat from growth-inducement around the proposed project. The Service recommends conservation easement(s) be placed along the proposed project alignment that would preclude construction of interchanges along the approximate 7 mile central portion of the proposed alignment. The easement should be sufficiently wide so as to preclude “spanning” the easement(s) with future interchanges. The Service believes this, or other measures to avoid or minimize effects to vernal pool species should be incorporated in the Final EIS/EIR for the proposed project.

**F-005-003**

Direct impacts of the proposed project would reduce the size of some existing vernal pool complexes that have been identified and mapped by Placer County, as illustrated in Figure 4.14-2 in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. Although the proposed project would not directly affect the vernal pools and uplands outside of the project limits, it could indirectly affect listed vernal pool branchiopods if they are present in these areas. Indirect effects could include changes in hydrology, water quality, and barriers to species dispersal due to the reduction in size, quality, and connectivity of the vernal pool habitats to other similar habitats in the project vicinity. A site-specific assessment of this impact would be implemented during the Tier 2 evaluation when more project-specific design details are developed. Where feasible, the project will be designed to minimize adverse impacts to the size, quality, or connectivity of adjacent vernal pool complexes by maintaining appropriate setbacks for ground-disturbing impacts, constructing culverts and drainage features for the future roadway to minimize changes to the natural hydrology or degradation of water quality in adjacent wetlands. If indirect effects cannot be substantially avoided or minimized, the transportation agencies would consult with USFWS on the preservation of existing vernal pool complexes in perpetuity, and would also consider the provision of off-site mitigation as appropriate.

Additional discussion of potential secondary and indirect impacts on vernal pools is presented in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD), which includes specific discussion about why the Parkway alternatives are unlikely to significantly affect branchiopod habitat in the study area (please see Appendix G, Section 4.3.1, of the PRD), where it explains that, “Vernal pool branchiopods occupy small patches of habitat in western Placer County that are often confined by existing agricultural and urban development. Branchiopod species have low potential for dispersal due to their body size and the relatively small size of the aquatic habitat that

F-005-006

The DEIS/EIR states that the majority of the proposed project area west of the Natomas East Main Drainage Canal is covered by the The Natomas Basin Habitat Conservation Plan (NBHCP). The NBHCP permits development in areas east of State Highway (SH) 99 and west of the Natomas East Main Drainage Canal (NEMDC), and west of SH 99 along Riego Road. However, the portion of Alternative 5 of the proposed project that occurs west of SH 99 along Sankey Road is outside of the permitted area. The NBHCP requires that:

“Any development...within Sutter County, beyond the 7,467 acres to be covered under its incidental take permits...will not be covered under the respective incidental take permits and will trigger an reevaluation of impacts to and mitigation for biological and other resources in the Natomas Basin and amendment of the NBHCP and the incidental take permits or development of a new HCP and issuance of new incidental take permits to address such impacts and mitigation as appropriate.”

Successful implementation of the NBHCP is premised on all of the area in the Natomas Basin outside of the permitted areas remaining undeveloped for the benefit of the covered species. The Service considers all land in the Natomas Basin as habitat for one or more of the covered species, including the federally-threatened giant garter snake (*Thamnophis gigas*). Indirect effects of a Placer Parkway SH 99/Riego Road interchange include necessitating widening of roads to access Placer Parkway; indirect effects to nearby NBHCP habitat preserves and one preserve managed by the Center for Natural Lands Management for the giant garter snake; and permanent loss of aquatic and/or upland habitat for the giant garter snake. The Service recommends that an analysis of the effects of the Alternative 5 to implementation of the NBHCP be analyzed, and if necessary, meaningful and specific compensatory minimization measures be proposed to address these effects.

Thank you for the opportunity to review this project. If we can be of further assistance, please contact Jana Milliken, Sacramento Valley Branch Chief, at (916) 414-6561 or Ken Sanchez, Assistant Field Supervisor, at (916) 414-6622.

Sincerely,



Kenneth Sanchez  
Assistant Field Supervisor

they occupy. Therefore, conservation of these species is less dependent on maintaining larger blocks of contiguous habitat (Brussard et al., 2004). The minimum reserve size recommended for vernal pool complexes is 200 acres (Brussard et al., 2004).”

Section 4.14.3 of the Draft Tier 1 EIS/EIR discusses potential effects on vernal pool branchiopods and acknowledges that vernal pool complexes would be susceptible to the effects of fragmentation caused by a new roadway. Section 5.13 discusses potential vernal pool species impacts that are "significant and unavoidable" under CEQA, acknowledges that direct impacts of the Parkway on these species would be "significant and unavoidable" under CEQA, and describes potential mitigation that could be implemented to reduce these impacts. Section 4.14.4 also discusses mitigation measures that could be implemented to reduce impacts on vernal pool species.

Please also see response to Comment F-004-027.

**F-005-004**

Please see response to Comment F-004-002, which discusses the rationale for selection of a one-mile analysis limit, and response to Comment F-004-003 regarding development in the 100-year floodplain.

**F-005-005**

The Draft Tier 1 EIS/EIR describes the potential use of conservation easements and other land use controls in Section 2.2.4.2. Additional details of measures that could be used to limit growth inducement and preclude the construction of interchanges in the Central Segment are provided in response to Comment F-002-011. Please see responses to Comments F-002-006 through F-002-008, which respond to previous USFWS comments related to mitigation to avoid or minimize effects to vernal pool species. Please also see Chapter 4 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

Ms. Celia McAdam

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cc:

Ms. Nancy Haley, U.S. Army Corps of Engineers, Sacramento, California  
Ms. Erin Foresman, U.S. Environmental Protection Agency, Sacramento, California  
Mr. Dave Smith, U.S. Environmental Protection Agency, San Francisco, California  
Mr. Larry Bagley, Sutter County Community Services, Yuba City, California

Literature Cited:

U.S. Fish and Wildlife Service. 2005. Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. Portland, Oregon. xxvi + 606 pages.

**F-005-006**

The potential effects on giant garter snake outside of the areas permitted under the Natomas Basin Habitat Conservation Plan (NBHCP) are acknowledged. This area includes approximately 18 acres, a portion of which is existing State Route (SR) 70/99 right-of-way and a portion of which is existing paved road (Sankey Road west of SR 70/99). The following bullet is added as the second bullet under Section 4.14.4.3, Tier 2 Mitigation Commitments:

- For project components outside of the area permitted for development under the NBHCP, negotiations with the USFWS will be undertaken to amend the NBHCP or provide such other compensation as would meet the intent of the NBHCP with respect to protection of special-status species in the NBHCP service area.

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March 15, 2009

Ms. Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

**Re: Comments on the Placer Parkway Corridor Preservation  
Project Partially Revised Draft Tier 1 EIS/Program EIR (January  
2009)**

Dear Ms. McAdam,

This office represents Ms. Joan Allen and Ms. Sharon Musto, and on behalf of our clients we submit these comments on the Placer Parkway Corridor Preservation Project Partially Revised Draft Tier 1 EIS/Program EIR ("Partially Revised Draft EIS/EIR"). These comments are to be considered supplemental to our previous comments on the initial Draft EIS/EIR, dated September 25, 2007 (attached).

As our previous letter describes, our clients are the owners of a 216-acre parcel in unincorporated Placer County located south of Phillip Road, east of Brewer Road and west of Country Acres Lane (APN 017-090-030). The property is currently subject to a Williamson Act contract, which creates an agricultural preserve and prohibits development or use of the property for non-agricultural purposes. Alternative 4 would border the southern edge of our clients' property, and Alternative 5 would bisect the property from east to west.

I-026-001 | We have reviewed the Partially Revised Draft EIS/EIR, and are generally  
I-026-002 | concerned that the lead agencies (SPRTA, Caltrans, and FHA) failed to utilize  
the opportunity presented by a recirculated CEQA/NEPA document to address  
the issues raised in our previous comments. We observe that the Placer  
Parkway project maintains the concept of a restricted access facility through  
Placer County west of Fiddymont Road, coupled with a "no-development buffer  
zone." We recognize that this scenario creates simplicity for the purposes of  
environmental review, albeit at the cost of an honest discussion of foreseeable  
project impacts.

### **I-026-001**

Issues raised by commenter on the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR have been responded to in this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR (please see responses to Comments I-020-001 through I-020-010).

### **I-026-002**

Please see Master Response 1, which discusses the no-development buffer zone, and responses to Comments I-020-004 and B-009-001 with respect to the specific issue raised by the commenter. Please also see response to Comment I-034-002, which discusses potential impacts on farmland. If the commenter's client's property would be bisected in a manner that would render each remnant parcel non-viable from an agricultural perspective, after consideration of the actions identified in Section 4.4.4.2 of the Draft Tier 1 EIS/EIR, the property would be purchased. This is further described in Section 4.14.1 of the Draft Tier 1 EIS/EIR.

I-026-002

Section 1.2.4 of the Partially Revised Draft EIS/EIR describes the intent of the "no-development buffer zone" is to further a "parkway" concept by:

- maintaining a visual open space concept and encouraging linkages to other open spaces along the corridor;
- preserving open space and agricultural uses adjacent to the Parkway;
- providing opportunities to preserve biological resources along the corridor; and
- limiting future development along the Parkway from encroaching to the facility's edge by maintaining it as a zone where development is either not permitted or is severely restricted.

In general, freeway facilities are not highly regarded in terms of their ability to preserve open space and habitat values. The freeway facility itself would be a complete impediment to the movement terrestrial species, drastically compromising any notion that the "no-development buffer zone" would create any kind of functioning wildlife corridor, as the document suggests. It makes no sense from a land planning standpoint to pretend that the future use of the adjacent property will be for open space and agricultural land preservation, or to justify the "no-development buffer zone" concept on these grounds.

The Partially Revised Draft EIS/EIR must not continue the fiction that land within the "no-development buffer zone" would remain suitable for viable agriculture. The situation relative to our client's property exemplifies this fact. As we have described previously, Alternative 5 would place the freeway corridor through the middle of our clients' property, eliminating the use of the property for productive agricultural purposes. This is true not only with respect to the portion of the property within the designated corridor, but the remainder as well. Under this Alternative, our clients would be left with two small parcels on either side of the corridor, without connecting access between them. In addition, each of these remainder parcels would be too small in acreage to cultivate efficiently or productively, and thus all agricultural use over the entire existing parcel would be effectively destroyed by this Alternative. Alternative 4 would have a reduced impact on our clients' property compared to Alternative 5, but indirect impacts associated with a freeway corridor along the southern frontage are still significant in terms of the continued feasibility of agricultural use.

I-026-003

Section 1.2.4 of the Partially Revised Draft EIS/EIR further states that:

It is intended that the no-development buffer zones would be owned and managed in the future to achieve these objectives. Since the value of the no-development buffer zones to maintain the parkway concept and limit access depends to some extent on the adjacent land uses, 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

### I-026-003

Please see Master Response 1, which discusses the no-development buffer zone, including mechanisms that could be used to acquire and manage property in the buffer, response to Comment B-009-002 regarding maintenance of the buffer, and response to Comment I-020-006 regarding property values.

I-026-003

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.

The lead agencies should recognize that our clients have no intention to "own and manage" property within the "no-development buffer zone." Such property would be practically valueless to own and without purpose to manage, since agricultural use would not be viable.<sup>1</sup> As we have previously commented, we do not believe that property within the buffer zone would retain residual value as conservation land. The Partially Revised Draft EIS/EIR does not recognize the value to the agricultural landowner of future mitigation banking opportunities and conservation easements that would otherwise be available absent a freeway corridor. At present, our clients' property has significant value as a potential agricultural preserve for wetland mitigation purposes and/or Swainson's Hawk foraging habitat. The impact to this value of property within a future pavement section is obvious, but it is further unlikely that any resource agency would accept a conservation easement to preserve agricultural land or Swainson's Hawk habitat adjacent to a freeway.

I-026-004

The Partially Revised Draft EIS/EIR must recognize that a taking of property rights of the extent envisioned by the "no-development buffer zone" would create the basis for inverse condemnation, unless it proposed by the lead agencies to acquire fee title at fair market value to the affected properties. As with the 2007 Draft EIS/EIR before it, the Partially Revised Draft EIS/EIR fails to adequately address this issue, or to even explore whether the buffer zone is a feasible concept from a cost perspective when the cost of acquisition is considered.

I-026-005

We further question how the "no-development buffer zone" concept is compatible with the purpose of the Placer Parkway, which is to serve the needs of existing and future development. Section 1.2.4 iterates that the buffer zone is intended to accomplish two purposes:

1. Preserve a high-speed facility by preventing unplanned interchanges from being constructed; and,

<sup>1</sup> Pages 2-10 to 2-11 of the 2007 Draft EIS/EIR state that: "Landscaping will be installed within the Parkway's "buffer areas," i.e., the portions of the 500- and 1,000-foot-wide corridors not used as part of the roadway cross section, as well as within the median. Landscaped buffer areas will incorporate fire-retardant low-maintenance plantings that are compatible with and may enhance the variety of existing landscape features in the study area such as Pleasant Grove Creek and vistas of the Sierra Foothills." The Partially Revised Draft EIS/EIR does not amend this concept, and thus we assume that it is still envisioned by the project. Obviously, installation of landscaping is not compatible with continued agricultural production, or natural habitat preservation.

**I-026-004**

Please see response to Comment B-009-003.

**I-026-005**

Please see response to Comment I-020-007. The Draft Tier 1 EIS/EIR acknowledges the potential for a future interchange at a future extension of Watt Avenue, but this would be proposed and constructed by others, if it occurs at all. The potential location of this interchange has been generally identified, and analyzed, in Chapter 7 of the Draft Tier 1 EIS/EIR, and would serve the developments identified by the commenter, as well as other origins/destinations.

The fee program evaluation was based on a nexus analysis of transportation impacts of the new growth areas. The fee program is being implemented through developers' agreements cited in the Memorandum of Agreement referenced by the commenter.

I-026-005

- 2. Limit opportunities for growth inducement that might otherwise result from provision of access in areas not planned for growth.

To avoid the concern over "unplanned interchanges" being constructed in the future, we continue to suggest that the interchange locations be defined and analyzed in the Partially Revised Draft EIS/EIR. We considered the restricted access concept to be unrealistic at the time of our initial comments in 2007, and subsequent events have borne this out. On December 9, 2008 the Placer County Board of Supervisors approved the Tier II Development Fee Memorandum of Agreement with Cities of Roseville, Rocklin, Lincoln and SPRTA<sup>2</sup>, largely for the purpose of funding the Placer Parkway project. The Tier II fee program imposes a \$5,473/unit development fee on new growth areas, including Placer Vineyards, Regional University, Sierra Vista, Creekview, Placer Ranch, Brookfield, Curry Creek, and Lincoln (outside existing city limits). These development areas combine to over 120,000 Dwelling Units Equivalents, and would collectively contribute an estimated \$475 million for the Placer Parkway.<sup>3</sup> It is difficult to grasp how the Tier II fee program would satisfy the necessary "nexus" requirements under AB1600 if the development areas paying the Tier II fee will have no access to the Placer Parkway. Yet, the Partially Revised Draft EIS/EIR continues to maintain that this is the case. The environmental document for the Placer Parkway should acknowledge the reality that additional interchange facilities may be constructed between Fiddymont Road and Sutter County, to provide access to the growth areas that demand (and are funding) the project.

I-026-006

The Partially Revised Draft EIS/EIR cannot be agnostic to the fact that the Placer Parkway will be more than simply a high-speed conduit between State Route 65 and State Route 70/99. Placer Parkway will be integrated into the west Placer County roadway network through controlled access interchanges. We believe that it is imperative that the lead agencies factor the location of future interchanges into each alternative, and augment the analysis of each alternative accordingly. A comparison of alternative "corridors" is meaningless unless a realistic assessment of future functionality is undertaken at this stage, and not deferred to future study.

I-026-007

We observe that a level of analysis of "hypothetical" future interchanges is contained in a new Appendix G to the Partially Revised Draft EIS/EIR, though limited in scope and prepared in the context of federal agency LEDPA<sup>4</sup> concerns rather than for CEQA/NEPA compliance. Appendix G contains supplemental analysis on a subset of issues, limited to growth-inducing effects, traffic, biological resources, and cumulative impacts. Page G-2 states that the purpose of this Appendix G is to "provide this information to the public to provide a fuller

<sup>2</sup> The Memorandum of Agreement was adopted by Rocklin on December 8, 2008 and Roseville on February 4, 2009. The City of Lincoln has yet to take action.

<sup>3</sup> See Memorandum of Agreement, at Section 1(b).

<sup>4</sup> Least Environmentally Damaging Practicable Alternative

**I-026-006**

Please see Master Response 1, which discusses the no-development buffer and the analysis of additional hypothetical interchanges which are not proposed as part of the project. Such interchanges, if proposed in the future by others, would be subject to separate, independent environmental review, including evaluation of potential growth inducement. Please also see response to Comment I-026-005 regarding a potential future Watt Avenue interchange that may be proposed by others in the future. No interchanges are proposed between Pleasant Grove Road and Fiddymont Road under the Placer Parkway project.

**I-026-007**

There has been full discussion and disclosure of proposed interchanges, and the concept of a limited access freeway since at least 2000 (please see the *Placer Parkway Interconnect Study Conceptual Plan* (DKS, 2000)), and the project's three Advisory Committees (please see Appendix A of the Draft Tier 1 EIS/EIR) all supported both this concept as well as the interchanges identified as part of the build alternatives analyzed in the Draft Tier 1 EIS/EIR. Please also see response to Comment I-026-006.

I-026-007

disclosure of potential environmental effects and to make a stronger foundation for subsequent Tier 2 (construction-level) environmental reviews and consideration any new interchanges or buffer adjustments." This analysis is critical beyond the determination of the LEDPA by federal agencies in the Section 404 permit process, and must be included as part of the overall CEQA/NEPA analysis. Determination of the LEDPA is not a process, it is a conclusion based on the NEPA process. We object to the approach taken in the Partially Revised Draft EIS/EIR to limit the analysis of future interchanges to what is perceived adequate to inform the narrow LEDPA determination, while withholding this discussion from the broader context of corridor selection as required by CEQA and NEPA.

I-026-008

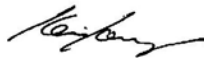
Although overly simplistic, the supplemental traffic analysis only supports and justifies our concerns regarding the likelihood of future interchanges. As this analysis recognizes (p. G-47), with the construction of additional interchanges the Placer Parkway would still operate at acceptable levels (LOS D or better) under all alternatives. Since the elimination of access points in the Central Corridor is not necessary to achieve the objective of free traffic flows on the Placer Parkway (and generally improves conditions on surface arterials), it is inevitable that interchanges will be added to the Central Corridor, a fact which the Partially Revised Draft EIS/EIR must recognize and analyze.

I-026-009

We continue to object to the selection of either Alternative 4 or 5 for the alignment of the Placer Parkway, particularly when combined with the "no-development buffer zone" concept the Partially Revised Draft EIS/EIR continues to describe. In light of the manner in which the Placer Parkway project is presented, which admittedly leaves much to the unknown, the strong preference of our clients is that Alternatives 4 and 5 be revised to avoid their property.

On behalf of our clients, we appreciate the opportunity to provide comment on the Partially Revised Draft EIS/EIR, and to participate in the planning process for this project.

Very truly yours,



Kevin Kemper

**I-026-008**

The commenter's point about additional interchanges not reducing acceptable levels of service on Placer Parkway is noted. Another purpose of proposing Placer Parkway as a limited access freeway was to avoid growth inducement in areas designated for agriculture (Draft Tier 1 EIS/EIR, page 1-11). Particularly in western portions of the Central Segment, this area is still designated for agriculture and no planned or proposed development has been identified. The Draft Tier 1 EIS/EIR does not recognize the inevitability of interchanges in this location and does describe a range of mechanisms that could be used to maximize protection of the no-development buffer zone and help to limit the likelihood of construction of future interchanges in this area (please see Section 2.2.4.2 of the Draft Tier 1 EIS/EIR).

**I-026-009**

Please see response to Comment I-020-010.



Law Offices of  
**GEORGE E. PHILLIPS**

2306 Garfield Avenue  
Carmichael, California 95608  
Telephone (916) 979-4800  
Telefax (916) 979-4801

September 25, 2007

Ms. Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

**Re: Comments on the Placer Parkway Corridor Preservation  
Project Draft Tier 1 EIS/Program EIR**

Dear Ms. McAdam,

This office represents Ms. Joan Allen and Ms. Sharon Musto, and on behalf of our clients we submit these comments on the Placer Parkway Corridor Preservation Project Draft Tier 1 EIS/Program EIR ("Draft EIS/EIR"). Our clients are the owners of property in unincorporated Placer County located south of Phillip Road, east of Brewer Road and west of Country Acres Lane (APN 017-090-030). This property is approximately 216 acres, and has been historically used for rice cultivation by the Allen family for many years. The property is currently subject to a Williamson Act contract, which creates an agricultural preserve and prohibits development or use of the property for non-agricultural purposes. Of particular concern to our clients is the proposed alternative Alignments 4 and 5. As identified, Alternative 4 would border the southern edge of our clients' property, and Alternative 5 would bisect the property from east to west.

The requirement to analyze a series of project alternatives to satisfy NEPA and CEQA requirements is recognized, and the efforts of SPRTA to identify five alternative routes for the center segment of the proposed Placer Parkway is appreciated. However, we observe the fact that with the exception of Alternatives 1 and 2, the alternative routes selected are all well north of future growth areas in Placer County, particularly the approved Placer Vineyards Specific Plan area.

It is interesting to observe that the 2020 Year Scenario indicates that no development within this timeframe would occur in the Creekview and Sierra Vista Specific Plan areas, the Placer Ranch Specific Plan area, Regional University and Curry Creek. See p. 3-5 of the Draft EIS/EIR. Instead, the Draft EIS/EIR assumes that development would commence after the year 2020, with buildout to occur prior to 2040. This scenario is at odds with the development timeframes

proposed for these development areas, which indicate that most, if not all, of these development areas would be substantially developed by the year 2020. As a result, the sections of the Draft EIS/EIR that rely upon the defined 2020 Year Scenario for analysis purposes, particularly the Traffic and Transportation section (Section 4.8) are flawed and inaccurate.

The Draft EIS/EIR assumes that the Placer Parkway facility would be operational in the year 2020. If indeed the buildout assumptions for these projects hold true as anticipated, the Placer Parkway would be operational after these development areas are built-out, and thus would be needed immediately to serve traffic demands associated with these projects. Therefore, from a functionality perspective, it makes sense to select an alternative that would effectively serve areas within Placer County that would be developing at the same time as the Placer Parkway facility. Alternatives 1 and 2 serve this purpose, and Alternatives 3, 4 and 5 do not.

The Draft EIS/EIR justifies the selection of corridors (Alternatives 4 and 5) that circumvent growth areas on the basis that access would be restricted along the central section under all Alternatives. We are skeptical that the Placer Parkway would actually be constructed in this manner, because this is contrary to the project purpose. As indicated on Page 1-7:

*The ultimate purpose of the proposed Placer Parkway project is to reduce anticipated congestion on the local and regional transportation system and advance economic development goals in southwestern Placer County and south Sutter County.*

In order for the Placer Parkway to be successful in reducing congestion on surface arterials in Placer County, it must be possible for vehicles to access the Placer Parkway through interchanges. Development is not only planned at either end of the Placer Parkway, it is planned along the center section as well. With the access restrictions identified in the Draft EIS/EIR, the Placer Parkway would not be accessible to most of the future growth areas in Placer County and the City of Roseville, including the Creekview Specific Plan, Curry Creek Specific Plan, Regional University Specific Plan, Sierra Vista Specific Plan, and the Placer Vineyards Specific Plan. This is not realistic. We observe that, for example, the Placer Vineyards Specific Plan EIR includes the Placer Parkway with a Watt Avenue interchange in the Mitigated Transportation Network Scenario.

We are concerned that the Draft EIS/EIR facilitates the selection of Alternatives 4 or 5 by minimizing the impact on agricultural land and resources associated with these Alternatives. The Draft EIS/EIR reduces the assessment of impacts to agriculture to simple math, by only offering a numerical comparison of farmland acreage directly impacted within the footprint of each Alternative. There are several serious deficiencies with this approach. Alternatives 1 and 2 would impact agricultural resources, but these impacts would occur within areas of Placer County where the transition from agricultural to urban use is proceeding

apace, with or without the Parkway. Alternatives 4 and 5 would place the central section corridor through agricultural areas not envisioned for urbanization under the County General Plan. There is a qualitative difference between these impacts that must be recognized in the Draft EIS/EIR.

Alternative 5 would place the freeway corridor through the middle of our clients' property, eliminating the use of the property for productive agricultural purposes. This is true not only with respect to the portion of the property within the designated corridor, but the remainder as well. Under this Alternative, our clients would be left with two small parcels on either side of the corridor, without connecting access between them. In addition, each of these remainder parcels would be too small in acreage to cultivate efficiently or productively, and thus all agricultural use over the entire existing parcel would be effectively destroyed by this Alternative. Alternative 4 would have a reduced impact on our clients' property compared to Alternative 5, but indirect impacts associated with a freeway corridor along the southern frontage are still significant in terms of the continued feasibility of agricultural use.

The brief (four paragraph) analysis of secondary and indirect impacts of the project on agricultural uses in Section 4.4.3.4 is noted, but this analysis does not capture the critical distinction between short-term impacts in urbanizing areas (under Alternatives 1 and 2) and permanent impacts in permanent agricultural areas (Alternatives 4 and 5). Moreover, the value of agricultural land is not simply assessed in terms of productivity. The Draft EIS/EIR does not recognize the value to the agricultural landowner of future mitigation banking opportunities and conservation easements that would otherwise be available absent a freeway corridor. At present, our clients' property has significant value as a potential agricultural preserve for wetland mitigation purposes and/or Swainson's Hawk foraging habitat. The impact to this value of property within defined corridor alignments is obvious, but it is further unlikely that any resource agency would accept a conservation easement to preserve agricultural land or Swainson's Hawk habitat adjacent to a freeway. This loss, combined with the elimination of agricultural productivity on our clients' property that would result from the Parkway must be analyzed in the Draft EIS/EIR because it would strip our clients of the economic value of their land.

These impacts are made worse by the "No-Development Buffer" described in the Draft EIS/EIR, which would drastically increase the impact of the Placer Parkway project on adjacent properties. We question how this concept is compatible with the purpose of the Placer Parkway, which is to serve the needs of existing and future development, and thus do not believe it is realistic in practice. As stated in the Draft EIS/EIR on page 2-9, the No Development Buffer is intended to accomplish two purposes:

1. Preserve a high-speed facility by preventing unplanned interchanges from being constructed; and,

2. Limit opportunities for growth inducement that might otherwise result from provision of access in areas not planned for growth.

To avoid the concern over "unplanned intersections" being constructed in the future, we would suggest that the intersection locations be defined and analyzed in the Draft EIS/EIR. This would further allow the Placer Parkway facility to be designed in such a manner as to preserve high-speed operation while incorporating intersections as needed. As to the second purpose, the best approach for limiting access to the Placer Parkway from areas not planned for growth is to designate the project corridor within growth areas. A corridor location well north of designated growth areas, combined with a No Development Buffer is an unwieldy and illogical alternative to achieve this purpose. A more sensible approach would be to place the Placer Parkway corridor within the future growth area (Alternatives 1 or 2) and allow these urbanizing areas to make efficient use of the Parkway.

On Page 2-10, the Draft EIS/EIR concludes:

*The proposed no-development buffer zones would serve as an effective land use control, because as a practical matter any additional Parkway access that may be proposed in the future must have physical access to the Parkway and the land immediately adjacent to it. If such land is protected and its use restricted, such additional connections could not be constructed.*

As proposed in the Draft EIS/EIR (see Page 2-10), the No Development Buffer would result in the elimination of future development rights on the impacted land within the buffer area. It is assumed that compensation for this loss would be provided to affected properties, but as explained above the Parkway would also eliminate the feasibility of continued agricultural operations on our clients' property, leaving them with no residual value and amounting to a full taking of their property rights.

Given the costs involved, not only with respect to our clients' property but others as well, the document must analyze whether the No Development Buffer can be carried out. It is not enough to simply conclude that "[i]mplementing the no-development buffer to protect lands will require funding for costs of acquisition, capital improvements, restoration and enhancement, operations and maintenance, easement stewardship, and administrative costs." The Draft EIS/EIR must analyze whether the Placer Parkway could be constructed with a No Development buffer considering the substantial added costs associated with acquisition of development rights or fee title for lands within the expanded buffer area.

We are further concerned that the analysis of growth-inducing impacts in the Draft EIS/EIR is minimized, particularly as it relates to Alternatives 4 and 5. On Page 6-16, it is stated that:

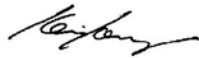
*It is unlikely that the choice of one Placer Parkway corridor alignment alternative over another would substantially change expected patterns of growth and development in the study area and the surrounding region.*

Standard land use practice recognizes that patterns of urbanization are significantly influenced by the availability of infrastructure, including major roadways. This concept is imbedded in the CEQA Guidelines, which identify the removal of obstacles to growth through the construction of infrastructure as a growth-inducing influence. See CEQA Guidelines §15126.2(d). We concur with the Draft EIS/EIR's conclusion as it relates to Alternatives 1 and 2, since these alternative routes are placed to serve designated growth areas. However, Alternatives 4 or 5 would place a freeway in an area not planned for urbanization, and would lead to significantly increased pressure for development in this area to capitalize on the investment the Placer Parkway represents. As stated above, we believe this pressure will trump the concept of limited access and the No Development Buffer, and will result in greater conversion of agricultural land than would occur under Alternatives 1 or 2. The Draft EIS/EIR focuses on the comparative impact on agricultural land represented by the footprint of each Alternative, but minimizes the larger impacts associated by the project's influence on regional growth patterns.

For the reasons stated above, we would object to the selection of either Alternative 4 or 5 for the alignment of the Placer Parkway. We believe that Alternatives 1 or 2 represent the preferable alignment for the Placer Parkway corridor, which would be further evident if all appropriate factors were considered in the Draft EIS/EIR.

On behalf of our clients, we appreciate the opportunity to provide comment on the Draft EIS/EIR, and to participate in the planning process for this project.

Very truly yours,



Kevin Kemper



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# Comment Card

Public Hearing For Comments on the Partially Revised Draft Tier 1 EIS/EIR -- Placer Parkway Corridor Preservation Project

Veterans Memorial Community Building  
February 23, 2009 – 6:00 p.m.

Please use the space below and the back to provide your comments regarding the Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project:

Dear Sirs:

I-027-001

I am commenting on this development as I was born and raised in Pleasant Grove and still own the family farm there. This parkway will impact the entire area negatively, reduce the value of my property and disturb the rural atmosphere of the entire area, with no benefit to anyone in Pleasant Grove or Sutter County. This only benefits the large developers in Placer County who are driving this proposal so that they can develop their land commercially.

I-027-002

This will dump thousands of cars onto I-70, compounding an existing bottleneck into Sacramento which can't be corrected due to existing development along I-5, thus spreading the gridlock now experienced between Rocklin and Sacramento and between Lincoln and Roseville to I-5 and I-70. It will also gridlock I-5 from Sacramento to the airport.

I-027-003

When the developments were first planned for Placer County, the transportation needs were not addressed properly and you now are seeking ways to alleviate them by going around the problem and trying to dump it onto Sutter County and directly on Pleasant Grove. There should have been roads from Lincoln and Rocklin put in through Placer County to Watt Ave and to I-80 in North Highlands. Instead you hoped that I-80 could handle all of the traffic through Roseville and now it can't.

I-027-004

Pleasant Grove is not being developed and they do not need a freeway through their community which provides no benefits and only harms the quality of life that they sought when they moved to Pleasant Grove instead of Lincoln or Rocklin. I don't think that the current commuters on I-70,

I-027-005

coming from northern Sutter County are aware that this freeway which will disrupt their commute and probably double their travel time is being proposed.

I-027-006

Barring all these arguments against the total proposal and assuming that it will proceed, then I would like to express my disapproval of alternatives 4 & 5 as they both call for the re-aligning of Sankey Road. The re-aligning of Sankey does not make sense when the parkway could proceed due west from where it crosses Pleasant Grove Road over to I-70 without impacting anything except bare farming land. Is this land owned by another large developer???? Could this be the reason for the re-alignment???? and the developer doesn't mind messing with other people's property, but leave mine alone.

## I-027-001

In the development of the build alternatives analyzed in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, it was recognized that Alternatives 4 and 5 would affect the Pleasant Grove community (pages 4.2-21 through 4.2-23). Sections 1.2 and 1.3 of the Draft Tier 1 EIS/EIR describe the Purpose and Need of the project, which includes the reduction of anticipated future and regional congestion and the advancement of economic development goals in southwest Placer County and South Sutter County. Sutter County would benefit economically by providing linkages to Sacramento County and employees that may reside to the east, as it develops its industrial land in the recently approved Sutter Point Specific Plan.

## I-027-002

Section 4.8 of the Draft Tier 1 EIS/EIR describes the projected changes in traffic volumes and levels of service (LOS) on roadways through in the study area, including State Route (SR) 70/99. As stated on page 4.8-99, "under all of the build alternatives, Placer Parkway would add traffic to SR 70/99 between I-5 and Riego Road and would cause a significant impact [under CEQA] on the LOS of this freeway segment." This section indicates that "SR 70/99 would operate at LOS F conditions in 2040 between I-5 and Riego Road under the No-Build Alternative. All of the build alternatives would add traffic to SR 70/99 from I-5 to the Parkway and thereby lengthen the period of time during the peak period when SR 70/99 would operate at LOS F conditions." Section 4.8.3 lists several Tier 2 mitigation considerations for SR 70/99 that (individually or collectively) would reduce the Parkway's impacts on SR 70/99 by decreasing the length of time spent in LOS F conditions during the morning and evening commute period.

## I-027-003

The Placer County General Plan adopted in 1994 recognized the need for future connections between the northern portions of the SR 65

**I-027-007** If the parkway were to be kept north of Sankey it would not impact the 150 year old homestead of the Sankey's, who were some of the original settlers in the area and for whom the road was named. The trees and shrubs that Mrs. Sankey planted and nourished have been there for 150 years and don't need to be disturbed for the profit or convenience of some developers in PLACER COUNTY. The cost of running the parkway straight across to I-70 can not be more than cost of re-aligning Sankey.

I would like an explanation for using the Sankey Road corridor and re-aligning Sankey instead of continuing straight across to I-70 from where it crosses Pleasant Grove Road. Crossing Pleasant Grove Creek Canal is not a deterrent or reasonable excuse as you are crossing the Natomis Canal on alternatives 1, 2 and 3.

**I-027-008** Alternative #1 makes the most sense as it disturbs the less intensely farmed areas of Pleasant Grove, but it still disturbs the community which does not want or need the added pollution and noise that this will bring to the area.

**I-027-009** The best choice for this road, would be to widen Baseline and Reigo Roads, all of the way from Roseville to I-70 as this is an existing road and has not been highly developed. The new parkway could intersect Baseline where Watt Ave currently ends. Watt will be extended and widened eventually, so it makes sense to do it now before all three roads are crowded in by development.

Thank you for considering my opinions, views and comments as I believe that they reflect the thoughts of all of Pleasant Grove's citizens whether they take the time to address this proposal now or later when the plans are finalized or the dirt is being moved. They will be against the destruction of their community with no benefits in return.

Sincerely,



Jonathon Burke

corridor (Lincoln, Rocklin, and the Sunset Industrial Area) and both SR 70/99 and Watt Avenue. The Circulation Plan Diagram in the County's General Plan includes several new post-2010 "thoroughfares" (special arterial roadway with greater access control) in western Placer County. These include a thoroughfare along the general alignment of Placer Parkway and another extending Watt Avenue north of Baseline Road to connect to both an extension of Blue Oaks Boulevard and the thoroughfare along the Placer Parkway alignment. As described in Section 3.4, Sutter County has also been part of regional efforts to plan for Placer Parkway, and has been an active participant in the development of the project and the environmental review process as members of the Project Development Team (PDT) and Policy, Technical, and Study Advisory Committees (PAC, TAC, and SAC).

**I-027-004**

Table 4.8-26 and Figures 4.8-11 through 4.8-15 of the Draft Tier 1 EIS/EIR show the projected changes in traffic volumes on local and regional roadways due to the build alternatives. They indicate that most local roadways in the Pleasant Grove area (including portions of Pleasant Grove Road, Riego Road, and Howsley Road) would see decreases in volumes due to Placer Parkway.

**I-027-005**

The Draft Tier 1 EIS/EIR (Section 4.8) indicates that (1) SR 70/99 between I-5 and Riego Road would operate at LOS F conditions under the No-Build Alternative, (2) Placer Parkway would cause a "significant" impact on this freeway segment under CEQA, and (3) several Tier 2 mitigation considerations were identified that would reduce the Parkway's impacts on SR 70/99.

**I-027-006**

Section 2.5 of the Draft Tier 1 EIS/EIR describes the Parkway

alternatives that were considered but eliminated from detailed analysis, and the alternatives analysis process which led to the development of the five build alternatives analyzed in the Draft Tier 1 EIS/EIR. Section 2.2.3.1 of the Draft Tier 1 EIS/EIR describes the realignment of Sankey Road, which would be necessary under Alternatives 4 and 5. This alignment would be required to allow space for the construction of a high-speed freeway to freeway interchange between the Parkway and SR 70/99, as well as to provide for local network connectivity and access. As part of the Parkway alternatives analysis, various alignments north of Sankey Road were considered but eliminated for failure to meet the project's Purpose and Need and/or environmental reasons. Please note that the specifics of the Sankey Road relocation would be determined by Sutter County as part of the development of the Sutter Pointe Specific Plan.

**I-027-007**

Please see response to Comment I-027-006, which discusses the alternatives analysis process which led to the selection of a connection with SR 70/99 at Sankey Road as one of two potential connections among the five build alternatives.

**I-027-008**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR. Please note that Sutter County has expressed a strong preference for a connection to SR 70/99 at Sankey Road (please see Comment Letter L-019).

**I-027-009**

The General Plan for Sutter County calls for the widening of Riego Road to six or eight lanes from SR 70/99 to the Placer County line. The General Plan for Placer County calls for Baseline Road to be widened



to six lanes from the Sutter County line to Roseville. These widenings are included in the No-Build Alternative. A concept very similar to the one described by the commenter – the Parkway connecting to Baseline Road at Watt Avenue – called the “Shorter Parkway Alternative” – was evaluated as part of the Tier 1 EIS/EIR process. As described in Sections 2.5.4.2 and 2.5.4.3 of the Draft Tier 1 EIS/EIR, this alternative was eliminated from further consideration because it did not meet the Purpose and Need of the project.



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### Comment Card

Public Hearing For Comments on the  
Partially Revised Draft Tier 1 EIS/EIR -- Placer Parkway Corridor Preservation Project

Veterans Memorial Community Building  
February 23, 2009 -- 6:00 p.m.

Please use the space below and the back to provide your comments regarding the  
Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation  
Project:

I-028-001

*I live on 3295 Sankey Rd, Sutter Co,  
I am opposed to a realignment  
of Sankey Rd on the Sutter Co side  
as we land owner's have already  
lost a large amount of frontage  
property, with the improvement  
and widening of Sankey Rd. in the  
past.*  
*Steve F. Burkhardt*

Please turn this card in today or send it and other written comments to:  
Celia McAdam, Executive Director - PCTPA, 299 Nevada St., Auburn, California  
95603 pctpa@pctpa.net. or use the pre-addressed envelope provided at the meeting  
(please note that you will still need to attach the appropriate postage)

### I-028-001

Please see response to Comment I-027-006, which discusses the alternatives analysis process that led to the selection of a Parkway connection with State Route 70/99 at Sankey Road as one of two potential connections among the five build alternatives.

**Sue Sholtis**

---

**From:** Rich Fabbre [rfabbre@surewest.net]  
**Sent:** Sunday, March 15, 2009 11:04 AM  
**To:** pctpa@pctpa.net  
**Subject:** Attention: Celia McAdam

Ms McAdams,

**I-029-001**

I live in West Roseville and am concerned about some of the alternative alignments being considered for the Placer County Parkway.

Future development in Westpark and Fiddymont Farms along with other planned new developments are likely to create a very dense population in the immediate area. Additionally, the site of the Regional University will be impacted by some alignments. I believe that the Placer County Parkway should be aligned as far to the north of the population area as possible, but still provide good service.

**I-029-002**

I support alternate Alignment #5. It will provide a much needed East-West corridor for the area but will not create a negative noise/arterial traffic impact to the residential areas to the south. Likewise, alternate #5 will not bisect the university complex, which I believe would be a huge mistake.

Thank you for your consideration.

Rich Fabbre  
2710 Woodgate Way,  
Roseville, CA 95747

**I-029-001**

The commenter expresses a preference for specific alternatives. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**I-029-002**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Final Tier 1 EIS/EIR. Please also see response to Comment B-010-002 regarding the Regional University Specific Plan and the environmental analysis.

3/16/2009

**Sue Sholtis**

---

**From:** hintzpls@aol.com  
**Sent:** Monday, March 16, 2009 6:39 AM  
**To:** pctpa@pctpa.net  
**Subject:** Comment on Placer Parkway Project

Regarding re-alignment of Sankey Road:

**I-030-001**

We are concerned about the proposed realignment of Sankey Road and the impact it will have on our home. What is the advantage? Why is it necessary to make such an extreme adjustment that will impact so many property owners?

Thank you,  
James and Diane Hintz  
3355 Sankey Road  
Pleasant Grove, CA 95668

---

Job Hunting? Start with the companies that posted job openings this week.

**I-030-001**

Please see response to Comment I-027-006, which discusses the alternatives analysis process that led to the selection of a Parkway connection with SR 70/99 at Sankey Road as one of two potential connections among the five build alternatives.

3/16/2009



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# Comment Card

Public Hearing For Comments on the  
Partially Revised Draft Tier 1 EIS/EIR – Placer Parkway Corridor Preservation Project

Placer County Board of Supervisors Chambers (The Domes)  
February 25, 2009 – 10:45 a.m.

Please use the space below and at the back to provide your comments regarding the Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project:

- I-031-001 | Alternative #1 would be the best route, as opposed to alternative #4. It is a more direct route; there is less land, wild life, homes to disrupt.
- I-031-002 | Alternative #4 would disrupt and destroy farmland, wetland and wildlife.
- I-031-003 | It is not fair to the community, nor to the people that have been here for all or most of their lives. To have to uproot and leave their land, homes, and community that their lives were built for and around.

Roy Jackson  
Barbara Jackson  
3459 Sankey Rd  
Pleasant Grove, Ca. 95668-9707

Please turn this card in today or send it and other written comments to:  
Ceila McAdam, Executive Director – PCTPA, 299 Nevada St., Auburn, California  
95603 pctpa@pctpa.net, or use the pre-addressed envelope provided at the meeting  
(please note that you will still need to attach the appropriate postage)

### I-031-001

The commenters express a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR. The Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD) identifies that Alternative 5 is the alternative with the least impacts on environmental resources (please see PRD, Section 3.6.6).

### I-031-002

Please see response to Comment I-031-001.

### I-031-003

Section 4.2.3.4 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR identifies changes in land use and the potential for secondary impacts associated with land lying adjacent to the Parkway, which would occur under any of the corridor alignment alternatives analyzed. Section 4.2.3 of the Draft Tier 1 EIS/EIR acknowledges that there would be displacement of homes and farmsteads, and discusses potential community disruption, which would also occur under any of the corridor alignment alternatives analyzed.



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MAR 16 2009

P.C.T.P.A.

# Comment Card

Public Hearing For Comments on the  
Partially Revised Draft Tier 1 EIS/EIR -- Placer Parkway Corridor Preservation Project

Placer County Board of Supervisors Chambers (The Domes)  
February 25, 2009 - 10:45 a.m.

I-032-001

Please see response to Comment I-031-001.

I-032-002

Please see response to Comment I-031-001.

I-032-003

Please see response to Comment I-031-003.

Please use the space below and at the back to provide your comments regarding the Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project:

I-032-001

ALTERNATIVE # 1 WOULD BE THE BEST ROUTE,  
~~AND~~ AS OPPOSED TO ALTERNATIVE # 4. IT IS  
A MORE DIRECT ROUTE; THERE IS LESS LAND,  
WILDLIFE & HOMES TO DISRUPT.

I-032-002

ALTERNATIVE # 4 WOULD DISRUPT & DESTROY FARM-  
LAND, WETLAND, & WILDLIFE.

I-032-003

IT IS NOT FAIR TO THE COMMUNITY, NOR  
TO THE PEOPLE THAT HAVE BEEN HERE FOR ALL -  
OR MOST OF THEIR LIVES - TO HAVE TO UPROOT  
& LEAVE THEIR LAND, HOMES, & COMMUNITY THAT  
THEIR LIVES WERE BUILT FOR & AROUND.

*Plasant Grove Ca 95668  
3451 Sankofa Rd. Esther Kent 3-12-09*

Please turn this card in today or send it and other written comments to:  
Celia McAdam, Executive Director - PCTPA, 299 Nevada St., Auburn, California  
95603 pctpa@pctpa.net, or use the pre-addressed envelope provided at the meeting  
(please note that you will still need to attach the appropriate postage)

PLACER PARKWAY  
CORRIDOR PRESERVATION

COMMENT CARD

March 11, 2009

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MAR 12 2009

P.C.T.P.A.

I-033-001

This is to address your proposal to re-align Sankey road. We own the property at 3295 Sankey Road. It is located on the south side of Sankey and on the east side of the rail road tracks. Your plan would encompass our frontage property. We have owned this small piece of land (32 acres) for more than 50 years. Sankey road is a straight, very serviceable road. It has historic value just as it is.

I-033-002

I do not see a benefit to the community in changing the road. It will also increase the projects budget to purchase land and rebuild the road. Please take this into consideration.

Thank you



Sharon L. Malone  
157 Canyon Highlands Dr.  
Oroville, Ca. 95966

530 532-1034

**I-033-001**

Please see response to Comment I-027-006, which discusses the alternatives analysis process that led to the selection of a Parkway connection with State Route (SR) 70/99 at Sankey Road as one of two potential connections among the five build alternatives. Please note that Sutter County has expressed a strong preference for a connection to SR 70/99 at Sankey Road (please see Comment Letter L-019).

**I-033-002**

Section 2.2.6 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR presents a preliminary cost estimate for the Parkway, including right-of-way acquisition and construction costs. Please also see response to Comment I-027-006, which discusses the alternatives analysis process which led to the selection of a Parkway connection with SR 70/99 at Sankey Road as one of two potential connections among the five build alternatives. Although specific costs would be associated with the acquisition of land for and construction of this realignment, it is an essential component of Alternatives 4 and 5. Please see response to Comment B-002-021 for more information regarding project funding.

RECEIVED

MAR 10 2009

P.C.T.P.A.

**B. Chris and Christy McKenzie**  
PO BOX 603  
PLEASANT GROVE, CA 95668  
Office: 916-655-3367  
Cell: 916-709-7885  
Cell: 916-709-0233  
Fax: 916-755-3344

---

March 9, 2009

Placer County Transportation Planning Agency  
Celia McAdam, Executive Director  
299 Nevada Street  
Auburn, California 95603

Dear Ms. McAdam:

The following comments are respectfully submitted pursuant to the *Partially Revised Draft Tier 1 EIS/EIR* for the proposed Placer Parkway Corridor Preservation Project.

I have been a full time farmer for the past 27 years and am a third generation farmer in Sutter County. I have built my home and developed a rice farm on 160 acres of owned land and 200+ acres adjacent leased farmland. This is a small farming unit serviced by 5 deep wells, some connecting pipelines and 2 water recovery pumps. I have been able to grow about 260 acres of rice, seed rice, and wild rice annually for 24+ years. While this is a modest farming operation it has generated a product that feeds people, has a positive impact on the environment, the US balance of trade, and the local economy. This is presently sustainable and requires only minimum (police and fire) of public services. See attached field map "A" derived from Sutter County Arial photos.

I-034-001

I personally favored a more northern route from SR99 at the northern study boundary directly east to the approximate Phillip Road eastern alignment and SR65. This would avoid congestion and duplication with the Riego Rd. interchange and Measure M traffic patterns. The route would be more direct as an expressway, require 15% less freeway, 2 fewer exchanges/overpasses and impact fewer homes. This alternative presented in your previous option should be reconsidered. My next preferences would be Alt 2 or Alt 1.

**I-034-001**

A more northerly alignment was determined to not provide sufficient traffic benefits. Please see response to Comment I-027-006, which discusses the Parkway alternatives analysis.



I-034-002

The consideration of alternatives 4 or 5 presents serious problems for my property and would likely end its use as a viable farm. This route as depicted would impact at least a portion of six developed "rice paddys" (a distinct area leveled for flood irrigation +/- 3") and separates the three deep wells from the adjacent fields they service. Please refer to attached map #1.

The well on 4-P9 services Field P8 (54 acres).

The well at the rice drying facility services P1, P3, and P4 through underground pipelines. Permanent pipes provide gravity flow from P4 to P5 to P6 to P1 to P10.

The well at P5 also services P6 and P1 and P10.

The rice drying and equipment facilities on this farm are situated on the small amount of buildable land (between P2, P4, and P1) located out of the Flood Plain. This is about 5 feet above the field elevation of P5 and P1.

The proposed plan would appear to require the replacement of 3 wells (currently costing about \$200,000 each). Additionally, the "diagonal" route would render the bulk of the entire farm virtually useless.

I-034-003

The route depicted also seems inappropriate in that it moves from Zone X (not flood plain) to Zone AE and Zone AH to the Placer County line. Please refer to current Federal Flood Map. This would necessitate a costly "5 to 7 foot" lift of the roadway to create a Causeway during winter months. In addition to being more costly this is a harder system to maintain and more hazardous roadway for drivers.

I-034-004

It should also be noted that virtually all of Alternative 1 and Alternative 2 are out of the determined flood plain. In addition the map shows that an east west route anywhere south of P2 (all the way to Riego Rd.) is above base flood plain elevation. It should be noted that the properties immediately south of the proposed route have not been utilized for farming nor irrigated in many years and contain no structures to the Placer County line.

### I-034-002

Potential impacts on farmland are discussed in Section 4.4.3 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. Potential socioeconomic impacts, including potential impacts on farming communities, are discussed in Section 4.2.3 of the Draft Tier 1 EIS/EIR. This section also explains mitigation measures that would be implemented to avoid and/or minimize impacts of the project on the viability of farms that could be affected. These issues will be analyzed in greater detail in the Tier 2 process when the precise roadway alignment within the selected corridor of the Parkway will be determined. During the Tier 2 process, all farmers would be directly contacted as specific alignments are evaluated, to see if the avoidance and minimization measures identified in Sections 4.4.4.1 and 4.4.4.2 of the Draft Tier 1 EIS/EIR would allow viable farming to continue. Please also see response to Comment B-009-002, which discusses the potential for continued farming in the no-development buffer area outside of the roadway.

Also, please note that, whatever alternative is selected, it is likely that local access on Pleasant Grove Road would be maintained by an overcrossing, as described in the last paragraph of Section 2.2.2 of the Draft Tier 1 EIS/EIR, and that the Parkway itself would span the Natomas East Main Drainage Canal and the adjacent railroad by an overcrossing, as described in the first paragraph of this section.

### I-034-003

Section 4.11 of the Draft Tier 1 EIS/EIR discussed the potential impacts of the project on floodplains. As Figure 4.11-1 shows, portions of all of the Parkway build alternatives would be located within floodplains. Section 4.11.4 of the Draft Tier 1 EIS/EIR describes avoidance and minimization measures with respect to floodplains, and makes several mitigation commitments in this regard. During the Tier 2 process, when the precise location of the Parkway alignment will be determined,

I-034-005

In order to familiarize your staff with the property in the proposed 4 route I have provided some photos to support the above comments.

Photos Taken March 6, 2009 show:

1. *South view of Dryer, Well, and Equipment storage taken to the South at P5. This well, dryer, and equipment storage would be isolated from fields P1, 5,6,7,8,10,11,12, and my home by the freeway.*
2. *North View from top of dryer of Field P1 and P 5 and P6 flooded by recent modest rains.*
3. *North East View from top of dryer of route through flooded P5, P6, and neighboring flooded fields.*
4. *East View from Pleasant Grove Rd. at SE corner of P9. No flood, no crop, no structures to and beyond Placer County line.*

I thank you for this opportunity to again make comments regarding your plans as they specifically apply to my property and livelihood. I would appreciate the opportunity to discuss your proposals and options in person at your convenience.

Sincerely,



Chris McKenzie

cc: Sutter County Public Works  
c/o James Gallagher  
Supervisor District 5  
Sutter County Board of Supervisors  
1160 Civic Center Blvd.  
Yuba City, Calif. 95993

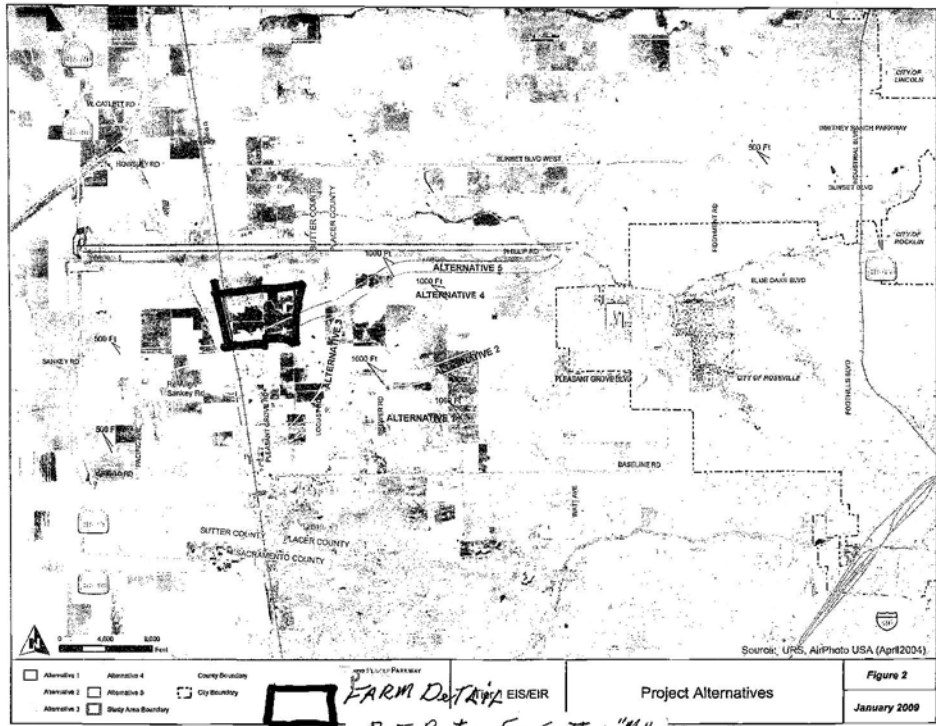
additional conceptual design, including drainage studies, will be developed. This will inform the best way to manage and to mitigate for floodplain impacts.

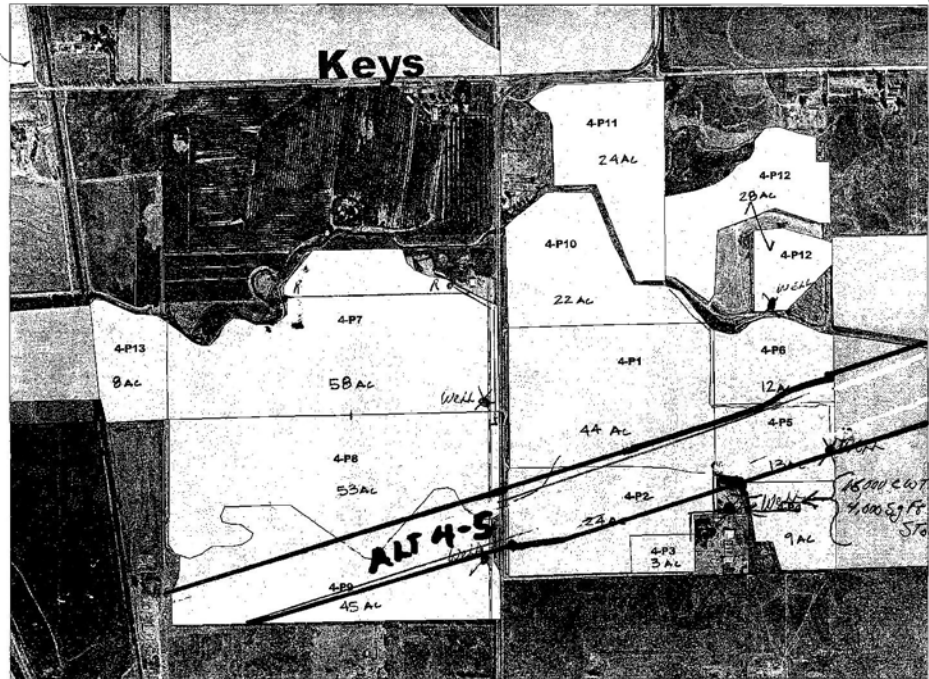
#### **I-034-004**

As presented in Table 4.11-5 of the Draft Tier 1 EIS/EIR, Alternatives 1 and 2 cross approximately 5,009 and 7,400 feet of floodplain, respectively. With respect to alternate alignments, Section 2.5 of the Draft Tier 1 EIS/EIR describes the Parkway alternatives that were considered but eliminated from detailed analysis. A variation of the southern route suggested by the commenter was evaluated but eliminated because of potential community, growth inducement, and environmental impacts, as described in Section 2.5.3.3 of the Draft Tier 1 EIS/EIR. Please also see response to Comment I-034-003.

#### **I-034-005**

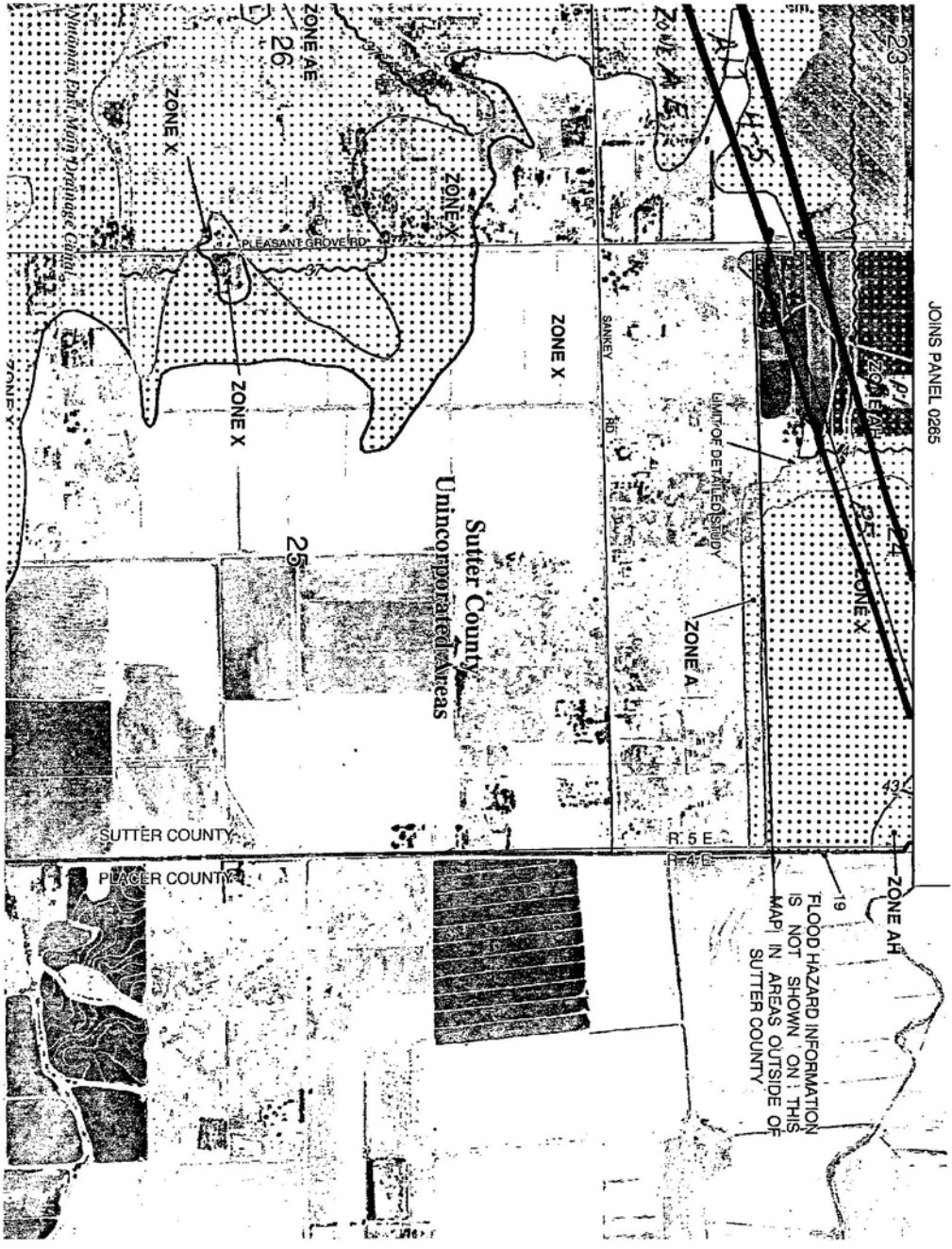
The photographs of your property are noted. Please see response to Comment I-034-002.





Mark P. Guisenberry  
Sutter County Agricultural Commissioner  
2004

Not an official map. For reference only.  Deep Well Scale: 1:9071



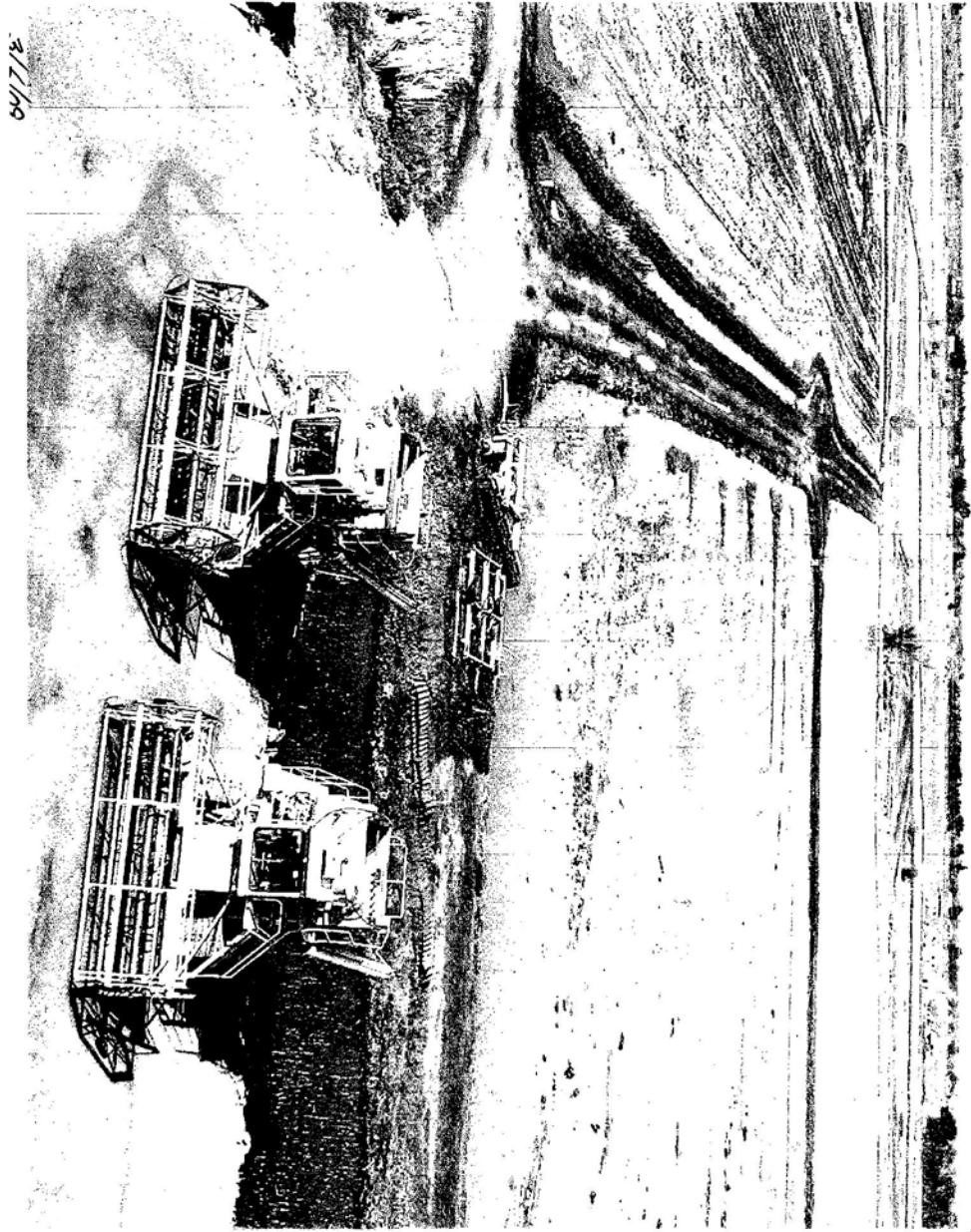
JOINS PANEL 0285

#1



3/6/09

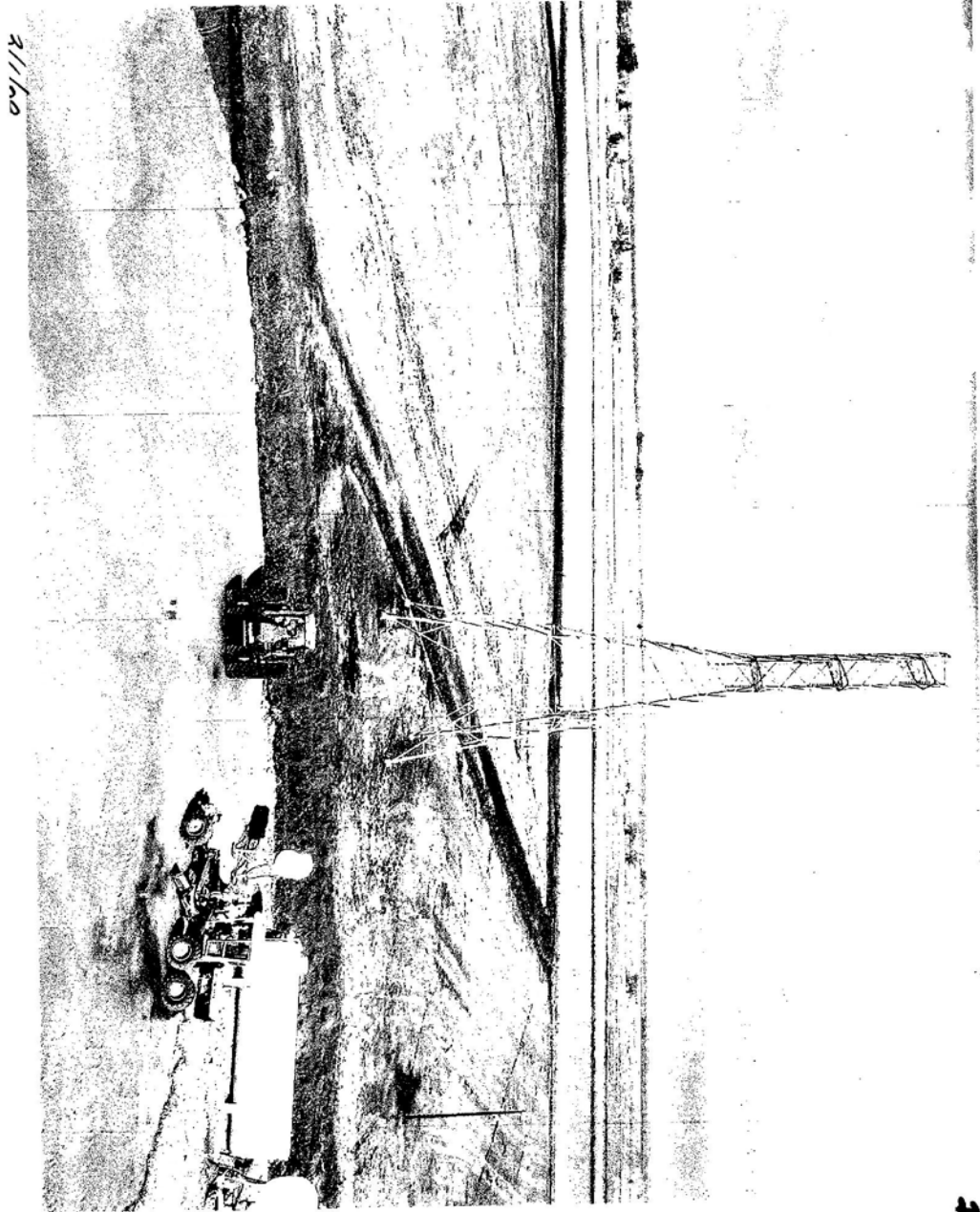
1



3/2/16

12

#2

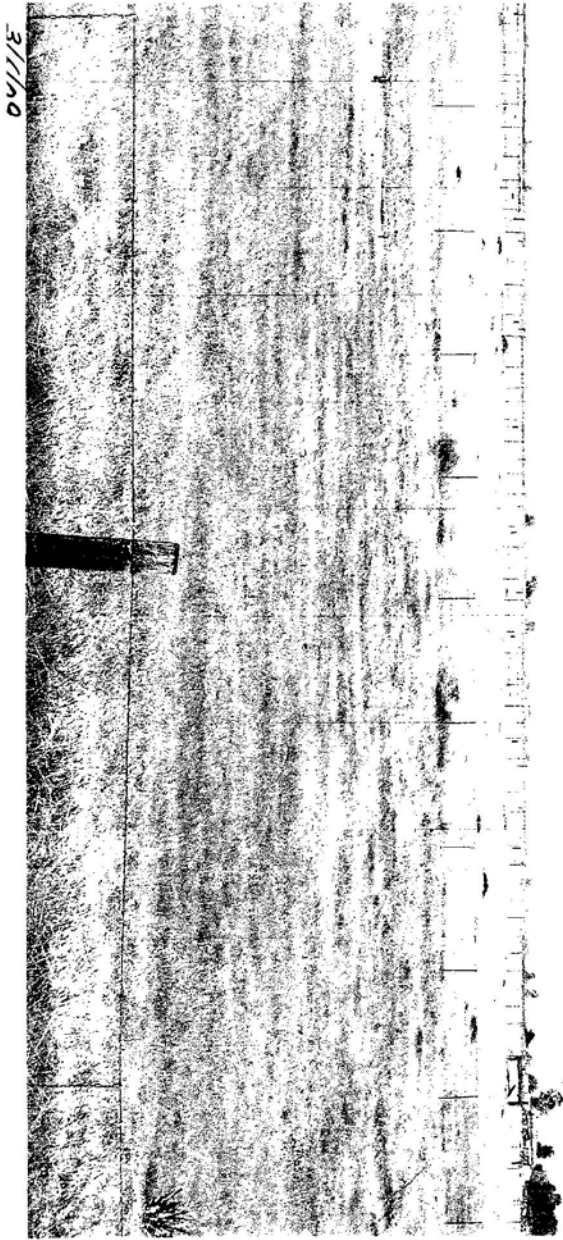


2/1/20

1

#3





#4

March 15, 2009

Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, Ca 95603  
(530) 823-4030 FAX (530) 823-4036  
[pctpa@pctpa.net](mailto:pctpa@pctpa.net); [cmcadam@pctpa.net](mailto:cmcadam@pctpa.net);  
[stidman@pctpa.net](mailto:stidman@pctpa.net)

RECEIVED

MAR 16 2009

P.C.T.P.A.

**SUBJECT:** Placer Parkway Corridor Preservation Tier 1  
Revised Draft Environmental Impact Statement/Program  
Environmental Impact Report. SCH #2003092069

Dear Agency Representatives,

Thank you for the opportunity to comment on the Placer  
Parkway Tier 1 Revised Draft EIS/EIR.

Please reference my letter dated September 2007 on the  
DEIS/DEIR.

**LIGHT RAIL/MASS TRANSIT**

I-035-001

The January 2009 Placer Parkway update mailing  
acknowledged; "Other potential transportation modes, such  
as bus rapid transit, may be developed in the future in the  
corridor." I understand Placer's financial preference for  
Bus Rapid Transit, however, isn't this the time to start  
planning for Light Rail? Although it is an added funding  
concern, wouldn't more funding sources or opportunities be  
available with the potential of Light Rail? Please  
identify how more funding may be available if Light Rail is  
considered. With several Universities planned in this  
area, Light Rail would be a benefit for students traveling  
between the Universities, as well as option for all  
residents to ultimately go to Sacramento and/or the  
Airport. Please analyze which Alternative would provide  
the most use and/or benefit to the public.

I-035-002

**CORRIDOR - BUFFER ZONE:**

I support a minimum of a 1,000 foot-wide corridor. Would a  
1,000 foot-wide corridor support Bus Rapid Transit as well

**I-035-001**

As the commenter notes, the the Parkway alignment could potentially  
function as a roadway or as some other kind of modal route. The Placer  
Parkway Corridor Preservation Draft Tier 1 EIS/EIR does include an  
analysis of a Transportation System Management Alternative (TSM)  
(please see Section 2.5.4), which could include some form of transit.  
However, the analysis confirmed that TSM alone would not meet the  
project Purpose and Need, as it would not adequately resolve the  
regional and local traffic congestion the project is intended to address. It  
is possible that light rail may be considered in the future, and should this  
be proposed, appropriate funding evaluation will be undertaken by the  
project proponents. The proposed project would not preclude a light rail  
option in the future. Please see response to Comment I-019-023.

Please see Master Response 2, which provides information regarding  
Placer County Transportation Planning Agency transit planning activities.

**I-035-002**

Please see response to Comment I-035-001. As described in response  
to Comment I-019-023, the 100-foot-wide median proposed for the  
Parkway provides a sufficient area for transit options, except potentially  
where elevated structures could affect feasibility due to grade  
considerations.

If feasible, light rail could help mitigate impacts to air quality and climate  
change in general because light rail would reduce vehicle miles traveled  
and the emissions associated with them. Section 4.9.3.7 of the Draft  
Tier 1 EIS/EIR describes some of the measures that could be employed  
to minimize greenhouse gas (GHG) emissions associated with vehicles  
using the Parkway. This discussion is expanded upon in the Placer  
Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR  
(PRD), which includes updated details of GHG regulation. Additional  
analysis of GHG impacts will be undertaken in the Tier 2 stage.

I-035-002

as Light Rail with selected areas for park and ride. What is the width of the corridor that includes Light Rail and parking in the area along Hwy 80 and Watt Ave/& Longview Drive? If this area is over 1,000 feet wide, shouldn't we plan for a few of these areas along the PP Corridor? Could these additional areas promote mass transit or carpooling? Wouldn't this help mitigate the impacts to Air Quality and Climate Change? I also support a buffer outside of the road alignment. I recognize these may be Tier 2 issues, but I'm raising them now for consideration in determining the width of the corridor and any buffer zone.

**LIMITED ACCESS - INTERCHANGES:**

I-035-003

Why would access be restricted for the 7 mile segment between Pleasant Grove and Fiddymont? Please explain. Isn't this an area where large development is being planned or already approved? With the exception of Watt Avenue, it is recognized additional interchanges are not being proposed as part of the Tier 1 process. However, this is an area of potentially dense population that access could provide service between the several universities as well as to the general population.

I-035-004

Although traffic volumes are evaluated by Alternatives for various Proposed, Potential and Hypothetical Interchanges, I did not find an analysis comparing the benefit by population and residential density units and development projects for the various Alternatives. Please provide this analysis. Please analyze and identify which development and planned potential development projects would use Alternative 1 versus Alternative 5.

I-035-005

It appears Alternative 1 with Option 1 would provide the most benefit, in my area, while comparing it to Alternative 5. Living in Sun City Roseville, I would not use Alternative 4 or 5 to go north and then go south toward Sacramento or the Airport. Please use this assumption in comparing Alternative 1 Option 1 versus Alternative 5.

I-035-006

Note: Option 2 is confusing for me. Please clarify how the Watt Avenue extension could occur.

I-035-007

Also, please provide the population and residential density units for Alternative 1 versus Alternative 5 in Sutter County. Please, clearly identify which Alternative benefits the most population and density units. The point I'm trying to

**I-035-003**

Section 2.2.1 of the Draft Tier 1 EIS/EIR describes the limited access concept of the Parkway. No access is proposed from Pleasant Grove Road to Fiddymont Road in order to maintain the Parkway as a high-speed free-flowing facility and limit opportunities for growth inducement. It is noted that a future Watt Avenue interchange with a future extension of Watt Avenue could be proposed by others in the future (please see Chapter 7 of the Draft Tier 1 EIS/EIR). Figure 3-1 in the Draft Tier 1 EIS/EIR shows the locations of existing, proposed, and planned development.

**I-035-004**

Section 6.1 of the Draft Tier 1 EIS/EIR presents the analysis of potential future growth in the study area. Section 6.1.3.3 presents the findings of the MEPLAN analysis; this is an integrated land use transportation model that forecasts the influence of transportation conditions on local land use development and vice versa. This analysis takes into account future planned and proposed projects as well as anticipated but unplanned growth.

The Parkway is proposed as a project that would have both regional and local benefits, which would occur across a wide area, as described in Chapter 1 of the Draft Tier 1 EIS/EIR. The traffic analysis incorporates both local and regional travel patterns and projections such as that proposed by the commenter. Effects on traffic volumes would likewise occur across a broad geographical area, as illustrated in Figure 4.8-1 in the Draft Tier 1 EIS/EIR, which presents the Transportation Analysis Study Area. For this reason, analysis of alternatives on traffic associated on specific residential developments was not considered appropriate, as the Parkway would serve traffic generated across the entire study area, including existing major cities such as Lincoln, Rocklin, and Roseville, and it is not possible to predict or evaluate future trip generation on a development-specific level.

**I-035-007** | make is; Sutter Point in Sutter County will have 17,500 units plus Schools, Industrial and parks, etc. while West Roseville/West Placer already has double that number being planned. Shouldn't the Preferred/Selected Alternative benefit the greatest number?

**I-035-008** | I am concerned that a Watt Avenue Interchange will only be viable with Alternative 1 with Option 1 (note my concern with Option 2 above). Did the recent approval of the Regional University eliminate not only ROW protection for the Placer Parkway but also eliminate the extension of Watt Avenue?  
Please discuss this and provide a map showing the potential feasible extension of Watt Avenue and where that will potentially occur. The approval of the Regional University adjacent to the West Roseville Specific Plan does not appear to allow for a Watt Avenue Interchange unless PP Alternative 1 is the preferred Alternative. Please clarify this. From what I understand, the Sierra Vista Specific Plan would have to dedicate a Watt Avenue extension but how far could Watt Ave be extended? Wouldn't eminent domain have to be exercised for Alternative 1 or the Watt Avenue Extension? How would the Watt Avenue extension occur to support Alternative 5?

**PREFERRED CORRIDOR ALTERNATIVE:**

**I-035-009** | I recommend Alternative 1 for selection as the Placer Parkway Preservation Corridor.

**I-035-010** | Has the Preferred Alternative been pre-determined? During various Public Hearings statements have been made indicating Alternative 5 will be selected as the Placer Parkway Corridor Alignment. These comments were made as recently as the Planning Commission and Board of Supervisors Hearings on the Regional University Specific Plan. The reason for this selection is based on the needs of Sutter County. It was stated this would be a "Road to Nowhere" without Funding from Sutter County. Legally, can Sutter County refuse to collect Traffic Impact Fees if an Alternative other than the one they want is selected? What about the traffic circulation needs of the residents in West Placer/Roseville?

**I-035-011** | Please note: There will be challenges to any Alternative that is selected, along with strong differences of opinion,

**I-035-005**

The traffic analysis presented in Section 4.8 of the Draft Tier 1 EIS/EIR does not include "Option 1," a Watt Avenue interchange, as part of the project. It does analyze a Watt Avenue connection in Chapter 7, but explicitly states that, "A Watt Avenue extension and/or interchange is not part of the proposed Placer Parkway" (page 7-1). The analysis presented in Chapter 7 does include an evaluation of the Parkway build alternatives with both possible Watt Avenue connections which could occur with Alternative 1. The analysis in Appendix G of the PRD included not only a potential Watt Avenue interchange but also other hypothetical interchanges, specifically conducted to consider how the comparison of alternative would be affected by allowing additional interchanges and development in the no-development buffer area. Please see Master Response 1, which provides more elaboration on the reason why the analysis of additional hypothetical interchanges was conducted. The analysis in the Draft Tier 1 EIS/EIR incorporates both local and regional travel patterns and projections such as that identified by the commenter. Please also see response to Comment I-035-004.

**I-035-006**

A detailed discussion of a potential Watt Avenue interchange with Placer Parkway is provided in Chapter 7 of the Draft Tier 1 EIS/EIR. This interchange and the extension of Watt Avenue are not part of the proposed project. An extension of Watt Avenue is included as a planned future roadway in the Placer County General Plan. If approved and constructed by others, this could provide access onto the Parkway via a new interchange. As such a connection is considered feasible, this interchange was evaluated as part of the Parkway analysis, although both a Watt Avenue extension and potential Parkway interchange would be subject to independent, future environmental review. Option 2 is just another potential location for this connection. As described in Chapter 7 (page 7-1), Alternative 1 includes two potential locations for a connection

I-035-011

but I feel Alternative 1 could potentially best serve West Placer/Roseville.

**CONCLUSION**

I am recommending Alternative 1.

Thank you for the opportunity to provide these comments and considering my comments during the Review Period. Also, where it appears I have already made comments or asked a question in the earlier DEIS/DEIR, my added comment is an attempt to clarify my point or request for data. Again, please excuse me if I may have asked questions that were address in the Tier 1 document. I may have over looked them due to the volume of the document. However, please respond to my questions.

I understand I am sharing some comments up-front that can apply now and also may need to be addressed in the Tier 2 document, please include those concerns at that time.

I-035-012

Please notify me and provide a copy of the FEIS/FEIR and any Technical Appendix when it's circulated. Thank you.

Sincerely,

Jan McKinsey  
8085 Stagecoach Circle  
Roseville, Ca 95747  
(916 783-9211)

(These comments were provided by email to meet the deadline with a follow-up hard copy sent by USPS)

with Watt Avenue, as the length and location of this alternative could allow for a connection in one of two different places.

**I-035-007**

The assumptions used in the Parkway analyses are presented in Table 3-2 of the Draft Tier 1 EIS/EIR. The assumptions do not change by alternative. Please see response to Comment I-035-004, which discusses how future local and regional travel patterns are reflected in the Parkway analysis, and Figures 4.8-11 through 4.8-15 for a graphical depiction of the change in volumes by alternative for roadways in the study area.

**I-035-008**

A Watt Avenue connection would be feasible with any alternative, as described in Chapter 7 of the Draft Tier 1 EIS/EIR. The Placer Parkway project is proceeding independently of the Regional University Specific Plan, which does not preclude an extension of Watt Avenue. Please see response to Comment B-010-002 regarding Placer Parkway and the Regional University Specific Plan.

**I-035-009**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Final Tier 1 EIS/EIR.

**I-035-010**

No alternative was "pre-determined." As required by the California Environmental Quality Act, an Environmentally Superior Alternative was identified, Alternative 5, based on the environmental analysis, and this is described in Section 3.6 of the PRD. Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**From:** jan [mailto:janmckin@comcast.net]  
**Sent:** Wednesday, March 18, 2009 1:01 PM  
**To:** Stan Tidman; PCTPA  
**Subject:** Placer Parkway DEIR - errata

Hi Stan,

**I-035-013** | If possible, Please include the attached Placer County letter in the Placer Parkway Revised DEIS/DEIR as an errata for my comments

While reviewing the PP Revised DEIR, I became aware that the comment period DEIR for the Sutter Point project just ended in early February. I called Placer County to see if they received a copy of the DEIR and made comments. I just received this email. The last paragraph item 4 on page 2 raises a concern on PP Funding. I have raised this concern at several hearings; "How and will Sutter County adequately fund the Placer Parkway?"

**I-035-014** | Please note, SPRTA was not copied on the Placer County letter.

Thank you,  
Jan McKinsey  
(916) 783-9211

**I-035-015** | P.S. If SPRTA received a copy of the Sutter Point DEIR and made comments, please include them in the DEIR.

----- Original Message -----  
**From:** George Rosasco  
**To:** [janmckin@comcast.net](mailto:janmckin@comcast.net)  
**Sent:** Wednesday, March 18, 2009 11:41 AM  
**Subject:** FW: Sutter Point Specific Plan

George Rosasco  
Supervising Planner  
Placer County Planning Department  
3091 County Center Drive  
Auburn, CA 95603  
Phone (530) 745-3065

**From:** Crystal Jacobsen  
**Sent:** Wednesday, March 18, 2009 10:27 AM  
**To:** George Rosasco  
**Subject:** Sutter Point Specific Plan

Here is a PDF of my comment letter...

\*\*\*\*\*  
Crystal Jacobsen  
Supervising Planner  
Placer County Planning  
3091 County Center Drive Ste. 140  
Auburn, CA 95603

Please see responses to Comment B-002-021 with respect to Parkway funding.

#### **I-035-011**

Please see response to Comment I-035-009. The comment that there will be strong opinions on the selection of an alternative is noted.

#### **I-035-012**

A copy of the Final Tier 1 EIS/EIR will be provided to the commenter.

#### **I-035-013**

The commenter requests that a letter from Placer County commenting on the Draft EIR for the Sutter Pointe Specific Plan be included in the "revised DEIS/DEIR." There has been and will not be a revised EIS/EIR document since the commenter's request on March 18, 2009, but the letter is included as an attachment to the commenter's letter in this Final Tier 1 EIS/EIR. No comment on the referenced letter is warranted.

#### **I-035-014**

Please see response to Comment I-035-011.

#### **I-035-015**

The South Placer Regional Transportation Authority (SPRTA) letter to Sutter County regarding the Sutter Pointe Specific Plan Environmental Impact Report is also attached, per the commenter's request.

530.745.3000 (main)  
530.745.3085 (direct)  
530.745.3080 (fax)  
cjacobse@placer.ca.gov  
\*\*\*\*\*



Sutter Point comment letter Jan 2009.pdf



**COUNTY OF PLACER**  
Community Development/Resource Agency

Michael J. Johnson, AICP  
Agency Director

**PLANNING**

January 30, 2009

**R E C E I V E D**  
FEB 04 2009  
**PLANNING DEPT.**

Mr. Doug Libby, AICP  
Principal Planner  
Sutter County Community Services Department  
1130 Civic Center Boulevard  
Yuba City, CA 95993

**SUBJECT: Sutter Pointe Specific Plan – DEIR County Comments**

Dear Mr. Libby:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Sutter Pointe Specific Plan project. Given the scale of the project, approval of the Specific Plan is a decision that will have significant regional impacts, including impacts to Placer County infrastructure, residents and businesses. Specifically, Placer County has concern regarding impacts associated with transportation and solid waste disposal within the County. To ensure that these impacts are fully mitigated, the County offers the following comments on the Draft Environmental Impact Report for the project.

**Project Description**

After reviewing the Project Description contained in the Draft EIR, the County has identified two areas of oversight:

1. Section 2.4.1, Page 2.7 – Placer County should be listed under "Other Agencies"
2. Section 2.4.3., Page 2-19 – In Table 2-4, Roadway improvements are not listed for Base Line Road, Watt Avenue, Walerga Road, or other Placer County roadways.

**Transportation**

Placer County initially provided comments related to transportation during the Notice of Preparation for the project and, after reviewing the DEIR for the project, the County has found that some issues raised in the County's comments for the NOP were not addressed. Given the large volume of traffic utilizing Base Line Road, would the provision of additional local east-west connector roads, parallel to Base Line Road, provide better circulation within the project and region? While Impact 3.3-20 (Page 3.3-96) discusses some of the issues, it does not provide any specific analysis or recommendations. In addition, Placer County's Placer Vineyards project will be installing an ITS system in conjunction with road improvements within Placer County. Therefore, it is the County's opinion that the EIR for the Sutter Pointe Specific Plan should examine how this system could be extended and/or interconnected with a similar system along Riego Road or other connecting roadways within Sutter Pointe or Sutter County.

3091 County Center Drive, Suite 140 / Auburn, California 95603 / (530) 745-3000 / Fax (530) 745-3080  
Internet Address: <http://www.placer.ca.gov/planning> / email: [planning@placer.ca.gov](mailto:planning@placer.ca.gov)



Upon further review of the DEIR, the County's has concluded that the Draft EIR needs to identify impacts to all Placer County roadways, and mitigation should be provided accordingly. Mitigation measures should include the type, extent and timing of necessary improvements. Impacts associated with the actual construction of required improvements need to be addressed in the DEIR. Additionally, fair-share funding may not result in timely construction of required improvements and, as a result, these impacts should also be analyzed. Mitigation for all impacts should be addressed in the project's Finance Plan.

With respect to fair-share funding, Mitigation Measure 3.3-1b describes developing agreements with other agencies pertaining to payments of fair-share impacts as mitigation. The Mitigation Measure describes the need for ongoing updates of these payments. The County has concern with this Mitigation Measure in that funding for the updates shall be provided by the project applicant, not Sutter County. Placer County would like the DEIR to identify who will oversee the updates, and how often the updates will occur. Additionally, the DEIR should identify who will administer the updates and traffic analysis. A copy of the project Development Agreement should be made available for review to verify that it contains language obligating the developer to either pay their fair-share of mitigation measures (including the timing of such payments), or defining the timing of construction improvements.

Placer County has identified further areas of oversight within the DEIR that need to be addressed. These include the following:

1. On Page 3.3-32, the Roadway Segment 8 is in Sutter County rather than Placer County; and on Page 3.3-34, the Roadway Segments 34 and 35 are in Placer county rather than Sacramento County.
2. In Section 3.1.3, Page 3.1-19, the sentence in the second paragraph reads "All off-site improvements would be constructed within existing roadway rights-of-way in Placer and Sacramento Counties". This statement is incorrect, in that Placer County does not currently have sufficient rights-of-way for the necessary improvements, including those on Baseline, Watt or Walerga Roadways.
3. In Section three, the Mitigation Measures and Impacts within Placer County area identified as on-site elements yet they are off-site of the projects and outside Sutter County. In other areas of this section, impacts are identified as on-site and off-site elements. Please provide for consistency with regard to the labeling of such impacts within Placer County.
4. The DEIR and the Finance Plan indicate that Sutter Pointe will construct a portion of Placer Parkway within its project limits; however, the documents do not indicate how construction of such improvements compares to their fair-share of the complete Placer Parkway project. In addition, the documents do not include any discussion regarding how the "gap" portion of the Placer Parkway within Sutter County will be funded or when it would be constructed. The DEIR and Finance Plan should provide for more discussion regarding Sutter Pointe's responsibility towards funding and constructing this "gap" portion of the roadway in a timely manner.

Doug Libby, AICP  
Sutter Pointe Specific Plan DEIR – County Comments  
January 30, 2009  
Page 3

**Solid Waste Disposal**


Upon reviewing the Public Utilities Section of the DEIR, Placer County has found that while solid waste disposal services would be provided to the site by the Regional Waste Management Authority, through its service contract with Yuba-Sutter Disposal, Inc., short-term construction-related solid waste is proposed to be exported to Placer County's landfill.

Section 3.10 of the DEIR states that "The off-site elements of the proposed project would extend into Placer County..."; and that "Construction of the off-site program elements would generate temporary, short-term construction-related debris and solid waste". The DEIR also notes that because the export of solid waste would be construction-related and therefore short-term, the landfill was not further discussed in the EIR.

Please note that while the DEIR indicates that exporting of solid waste to Placer County's landfill would be a short-term construction-related activity, Placer County prohibits the transport of solid waste materials into the County. Placer County Code Section 8.16.210 states that "It is unlawful for any person excluding individual homeowners to transport refuse into this County without first securing a written permit to do so from the Board of Supervisors". This issue will need to be more thoroughly addressed in the EIR so that it is acknowledged that solid waste materials *will not* be transported to Placer County. To this end, it is important that the EIR acknowledge where the solid waste material will be transported.

Once again, thank you for the opportunity to comment on the Draft EIR for the Sutter Pointe Specific Plan. Should you have any questions regarding these comments, please do not hesitate to contact me at 530.745.3197.

Sincerely,



MICHAEL J. JOHNSON, AICP  
Community Development Resource Agency Director

Cc:  
Tom Miller, County Executive Officer  
Holly Heinzen, County Executive Office  
Allison Carlos, County Executive Office  
Jim Duffee, Facility Services Department  
Ken Grehm, Public Works Department  
Loren Clark, Planning Department  
Paul Thompson, Planning Department  
Crystal Jacobsen, Planning Department  
Andrew Gaber, Public Works Department  
Maywan Krach, Environmental Coordination Services



City of Lincoln • City of Rocklin • City of Roseville • Placer County

Via email – [dglabby@co.sutter.ca.us](mailto:dglabby@co.sutter.ca.us) and U.S. Postal Service

February 2, 2008

Doug Libby, AICP  
Principal Planner  
Sutter County Community Services Department  
1130 Civic Center Blvd.  
Yuba City, CA 95993

**Re: Sutter Pointe Specific Plan Draft Environmental Impact Report**

Dear Mr. Libby:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Sutter Pointe Specific Plan (Specific Plan).

The South Placer Regional Transportation Authority (SPRTA) and the Federal Highway Administration (FHWA) are working to complete the Placer Parkway Corridor Preservation and Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR). A portion of the Specific Plan lies in the western segment of the Placer Parkway Corridor Preservation Project's study area.

The Placer Parkway Draft Tier 1 EIS/EIR evaluates a No Build alternative along with five corridor alignment alternatives. All five would cross the Specific Plan from east to west. There would be a State Route (SR) 70/99 connection either north of Riego Road or at Sankey Road.

Comments were provided (Attachment 1) on the Specific Plan's Notice of Preparation (NOP) on April 30, 2007. On August 6, 2007, the SPRTA Board held a public hearing in Yuba City to get comments on the Draft Tier 1 EIS/EIR. The final Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project is expected to be completed by summer 2009.

**Specific Plan DEIR and General Plan Amendment (GPA) Comments**

Our review of the Specific Plan, the proposed GPA, and the DEIR identified the following key issues relative to the Placer Parkway Corridor Preservation project:

299 NEVADA STREET • AUBURN, CA 95603 • (530) 823-4030 • FAX 823-4036

1. The Specific Plan (Regional Roadway Access) supports and anticipates the completion of the Placer Parkway along the current Sankey Road alignment with a future freeway-to-freeway interchange at SR 70/99. A four-lane interim condition is described. A future improvement within the Parkway corridor, at buildout, would include full interchanges at SR 70/99 and a future north-south arterial on the eastern side of the Plan area, and a grade-separated overcrossing at Pacific Avenue. As described, this circulation scheme is consistent with assumptions for Placer Parkway Tier 1 EIS/EIR Alternatives 4 and 5. However, this Parkway description is not consistently referred to in the GPA or the DEIR.
2. The Specific Plan shows a right-of-way width for Sankey Road between 103 and 107 feet and thus does not appear to provide the required 500 foot wide right-of-way for Placer Parkway – even if open space and detention basin land could be used along with the proposed right-of-way. How is this Specific Plan reference consistent with the Parkway's 500'-wide corridor width and its ultimate six-lanes?
3. The GPA does not include the Placer Parkway as part of its functional classification of roadways.
4. On pages 3.3-22 and 3.3-23, the DEIR describes the two corridor alignment corridor alternatives for Placer Parkway, which it calls Alternative 1 (the southern alignment –north of Riego Road) and Alternative 2 (the Sankey Road alignment). It states that "The proposed Specific Plan includes the 500-foot right-of-way reservation for Alternative 2 but not for Alternative 1". However, the Specific Plan does not appear to provide a 500 foot right-of-way for the Placer Parkway along Sankey Road and it appears that the Parkway would cross proposed park land in the SPSP, which may pose Section 4f impacts.
5. The DEIR shows that under cumulative conditions Placer Parkway would eliminate some Level of Service (LOS) impacts of the Specific Plan on roadways in other jurisdictions, including portions of Baseline Road in Placer County and Elverta Road in Sacramento County. The DEIR includes a mitigation measure that states that the project applicant shall pay its fair share of costs to construct Placer Parkway as a four-lane freeway/expressway between SR 65 and SR 70/99.
6. The DEIR states that "full funding for Placer Parkway has not yet been identified" and thus evaluates cumulative traffic conditions with and without Placer Parkway. However, the DEIR only evaluates the Placer Parkway alignment along Sankey Road, not the southern corridor alignment alternatives and the SR 70/99 connection north of Riego Road.

7. The Public Facilities Financing Plan (PFFP) does not discuss participation in financing of Placer Parkway, such as a fee program. SPRTA's (soon to be adopted) Tier II Fee Program assumes that the Specific Plan would pay the same average fee as development located in Placer County within SPRTA's boundaries. The Specific Plan's Phase 1 would have about 25,000 dwelling unit equivalents (DUEs). Parkway funding, through the Specific Plan, should be coordinated with SPRTA.
8. SPRTA recognizes the County's process to approve this development, including the Specific Plan, is concurrent with the efforts of FHWA and SPRTA to complete the Tier 1 EIS/EIR for the future Placer Parkway, and this concurrent process creates challenges. Because of the complexity of the issues associated with the Placer Parkway's multiple corridor and SR 70/99 interchange alternatives and the numerous development proposals being considered in south Sutter and western Placer counties. SPRTA will continue to work cooperatively with the Sutter County to assure that the processing of the Final Tier 1 EIS/EIR for the Placer Parkway is not adversely affected. FHWA and SPRTA will continue to evaluate all five corridor alternatives, regardless of the County action on a particular development proposal. In this regard, the DEIR for the Specific Plan should analyze the impacts of all of the corridor alternatives.

SPRTA appreciates Sutter County's and the Specific Plan's applicant's cooperation and involvement in the Placer Parkway planning and environmental process. If you have any questions, please contact me at 530.823.4030.

Sincerely,



Celia McAdam, AICP  
Executive Director

Enclosure

Copies: Gary Sweeten, Federal Highway Administration  
Rick Dondro, Placer County Public Works  
Bill Moore, Roseville Public Works  
Kathy Pease, Roseville Planning

## ATTACHMENT 1



PLACER COUNTY  
TRANSPORTATION  
PLANNING AGENCY

April 30, 2007 via email – [dqlibby@co.sutter.ca.us](mailto:dqlibby@co.sutter.ca.us) and U.S. Postal Service

Doug Libby, Senior Planner  
Sutter County Community Services Dept. -- Planning  
1130 Civic Center Blvd.  
Yuba City, CA 95993

BOB SNYDER  
City of Auburn  
SHERRIE BLACKMUN  
City of Colusa  
TOM COSGROVE  
City of Lincoln  
RUSS KELLEY  
Town of Loomis  
KATHY LIND  
City of Rocklin  
GINA GARBOLENO  
City of Roseville  
JIM HOLMES  
KIRK UHLER  
Placer County  
RON MONTVIRE  
Citizen Representative  
CELIA MCADAM  
Executive Director

**Re: Sutter Pointe Specific Plan Draft Environmental Impact Report  
Notice of Preparation Comments**

Dear Mr. Libby:

Thank you for the March 29, 2007 Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the Sutter Pointe Specific Plan. A portion of the proposed specific plan lies in the western segment of the Placer Parkway Corridor Preservation project's study area. See the attached vicinity map. Placer County Transportation Planning Agency (PCTPA), on behalf of the South Placer Regional Transportation Authority (SPRTA), is working to complete the Placer Parkway Corridor Preservation and Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR).

### Placer Parkway

#### **Concept**

Placer Parkway is a high-priority regional transportation project. It would connect rapidly growing areas of western Placer County at State Route (SR) 65 to planned development in south Sutter County at SR 70/99.

The concept of the Placer Parkway has been considered for over a decade. Placer County's 1994 General Plan depicts a plan line for it. Later, PCTPA and Sacramento Area Council of Governments (SACOG) Boards adopted preliminary planning documents for the Parkway (2000 Conceptual Plan and 2001 Project Study Report). The project is also identified in the 2027 Placer County Regional Transportation Plan and SACOG's 2027 Metropolitan Transportation Plan. See the PCTPA web site – [www.pctpa.org](http://www.pctpa.org).

Basic Placer Parkway concepts developed through this preliminary planning work and being carried forward in the Corridor Preservation project are:

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1. The transportation facility will be in a corridor varying from 500'- wide in the east/west segments and 1,000'-wide between Pleasant Grove Road and Fiddymment Road.
2. There will be a number of Parkway interchanges (SR 65 & SR 70/99, Fiddymment, Foothills, etc.). Only one potential interchange, at a future extension of Watt Ave. or other nearby roadway extension, will be allowed in the central segment (Fiddymment Rd. to Pleasant Grove Rd.). The impacts of the Placer Parkway with and without such a connection will be studied.
3. The corridor area on either side of the future transportation facility is to be a no-development buffer.

#### **Corridor Preservation Project**

The Corridor Preservation project has two phases:

- Phase 1 – identify feasible corridor alignment alternatives.
- Phase 2 – complete the Tier 1 EIS/EIR.

Phase 1. During this phase, two, very well attended meetings were held at Pleasant Grove School. The first was a 2003 scoping meeting. The second was a 2004 public meeting on potential corridor alignments alternatives.

Three newsletters were sent to several thousand individuals. Twenty advisory committee meetings were also held to help guide the project. Sutter County staff, via the Technical Advisory Committee and Study Advisory Committee has participated on the project. The Sutter County Administrative Officer and two Board members served on the Policy Advisory Committee. In addition, informational briefings were made to the Sutter County Board of Supervisors and the SPRTA Board, and individual meetings were held with interested members of the public on a variety of topics.

Sutter Pointe representatives, County staff, and the Parkway project teams have exchanged information over the past two years. We have set-up meetings with Caltrans and Natomas Basin Conservancy along with County staff to discuss circulation (SR 70/99 connections, a potential Sankey Road relocation, conceptual Parkway interchange configurations, and local access); agricultural land preservation, and biological resources.

On September 28, 2005, the SPRTA Board identified five 'build' corridor alignment alternatives, in addition to the No Project alternative, to be analyzed in the Tier 1 EIS/EIR (see attached map). All of the corridor alignment alternatives cross over the proposed specific plan. Alternatives 1, 2, and 3 would connect

with SR 70/99 approximately one half mile north of Riego Road. Alternatives 4 and 5 would also cross the specific plan area and connect with SR 70/99 at Sankey Road. The corridor width for all these alternatives through the specific plan area is 500'-wide.

Federal resource agencies concurred that these corridor alternatives represent a reasonable range to be analyzed in the Tier 1 EIS/EIR. It was further agreed that these five 'build' alternatives would be considered with a commitment to construction options and resource protection techniques as a way to meet avoidance obligations.

Phase 2. There is no 'preferred' or 'recommended' corridor alignment for the Placer Parkway, or will there be until the Tier 1 EIS/EIR is completed. The Tier 1 EIS/EIR must equally analyze all reasonable alternatives. A draft Tier 1 EIS/EIR is expected by summer 2007. Federal and State clearances for the corridor preservation environmental work may be ready by summer 2008. Once the preferred corridor is determined, key pieces of land can be acquired to preserve right-of-way for the Parkway.

The approximate 350'-wide transportation facility will eventually be located within the Parkway corridor. The roadway's precise location within the corridor will be determined by a second project-level environmental review.

#### **NOP Comments**

The Placer Parkway is cited in the NOP as a planned alignment parallel to Sankey Road, which is a future east-west corridor that would provide access to the southwest Placer County area.

The DEIR should:

1. Indicate that there are two potential corridor alignments, identified through a public review process, which would cross over the proposed specific plan.
2. Analyze the impacts of the 500'-wide Parkway corridor through the specific plan area. If the 500'-wide corridor is not to be accommodated by the specific plan, the DEIR should clearly cite this intent and analyze how it would affect the Placer Parkway.
3. Address how the proposed specific plan could stage or phase development in order to avoid conflict with the Placer Parkway development process.

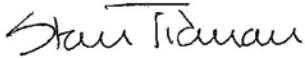


Doug Libby, Sutter County Community Development Services  
April 30, 2007  
Page 4

PCTPA recognizes the concurrent development of proposals such as Sutter Pointe along with the Parkway's Corridor Preservation Tier 1 EIS/EIR creates a challenging situation for all involved. We appreciate the applicant's cooperation and Sutter County's involvement in the Placer Parkway planning and environmental process.

Thank you for the opportunity to comment. If you have any questions, please call Celia McAdam at 823.4030 or me at 823.4033.

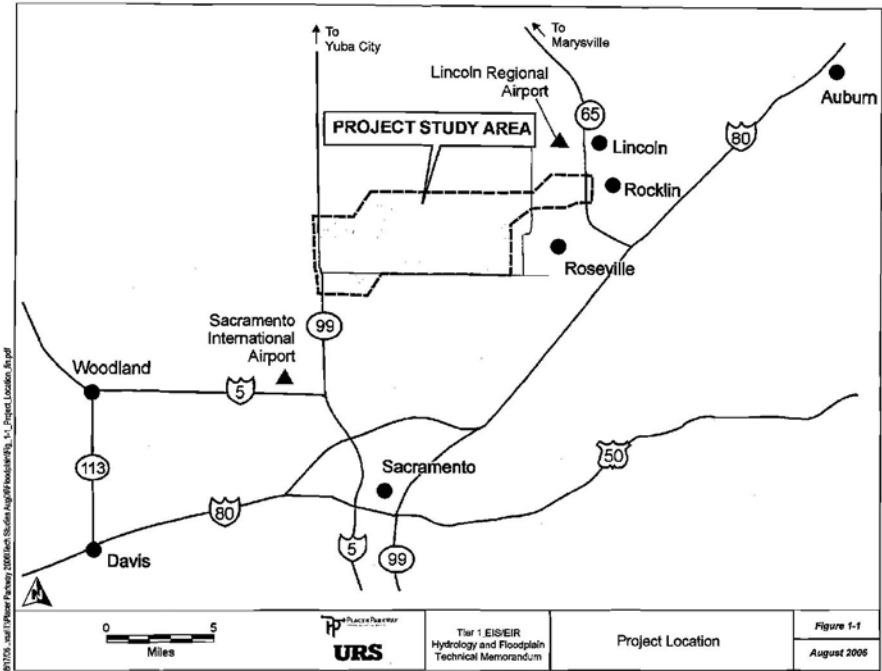
Sincerely,



Stan Tidman, Senior Planner

ST:ss  
Enclosures

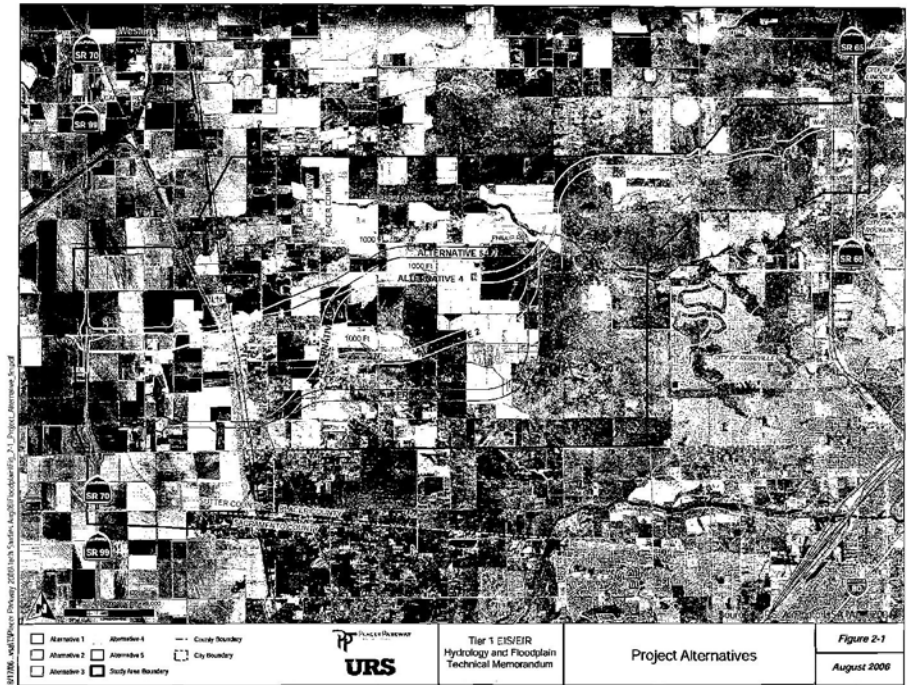
Copies: Celia McAdam, PCTPA Executive Director  
Denise Heick, URS Corporation



Tier 1 EIS/EIR  
Hydrology and Floodplain  
Technical Memorandum

Project Location

Figure 1-1  
August 2005





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MAR 16 2009  
P.C.T.P.A.

# Comment Card

Public Hearing For Comments on the  
Partially Revised Draft Tier 1 EIS/EIR -- Placer Parkway Corridor Preservation Project

Placer County Board of Supervisors Chambers (The Domes)  
February 25, 2009 - 10:45 a.m.

Please use the space below and at the back to provide your comments regarding the Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project:

I-036-001

*I don't think there should be a Highway built  
near Sankey Road for there to many  
houses and to many acres to be replace  
and you run to much farm land and  
I don't want a freeway that close to  
me beside I 78 you all and don't want  
to make*

*Myrtle Norrell  
3387 Sankey Rd  
Placerville Grade Calif  
95668*

Please turn this card in today or send it and other written comments to:  
Celia McAdam, Executive Director - PCTPA, 299 Nevada St., Auburn, California  
95603 pctpa@pctpa.net, or use the pre-addressed envelope provided at the meeting  
(please note that you will still need to attach the appropriate postage)

## I-036-001

The commenter notes that she does not want a highway near or on Sankey Road. This comment is noted. Please see response to Comment I-027-006, which discusses the alternatives analysis process that led to the selection of a Parkway connection with SR 70/99 at Sankey Road as one of two potential connections among the five build alternatives.



RECEIVED  
MAR 16 2009  
P.C.T.P.A.

# Comment Card

Public Hearing For Comments on the  
Partially Revised Draft Tier 1 EIS/EIR - Placer Parkway Corridor Preservation Project

Placer County Board of Supervisors Chambers (The Domes)  
February 25, 2009 - 10:45 a.m.

Please use the space below and at the back to provide your comments regarding the Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project:

I-037-001

I live on Sankey RD  
AND I WOULD RATHER  
see IT GO IN ON  
RieG ROAD near the  
SUTTER/SACRAMENTO COUNTY  
line, Leave SANKEY RD  
ALONE, we have enough  
to deal with SO GO WITH-

Please turn this card in today or send it and other written comments to:  
Celia McAdam, Executive Director - PCTPA, 299 Nevada St., Auburn, California  
95603 pctpa@pctpa.net, or use the pre-addressed envelope provided at the meeting  
(please note that you will still need to attach the appropriate postage)

## I-037-001

The commenter notes that he or she would prefer that Placer Parkway be located near Riego Road, not Sankey Road where the commenter is located. This comment is noted. Please note that the Federal Highway Administration had not agreed to any alternative at the time the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR was circulated for public comment on January 30, 2009. Please see response to Comment I-027-006, which discusses the alternatives analysis process that led to the selection of a Parkway connection with SR 70/99 at Sankey Road as one of two potential connections among the five build alternatives. Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

I-037-001

THE PLAN THE FEDERAL  
GOVERNMENT HAS ALREADY  
AGREED TO, BUT ME  
PERSONALLY I WOULD RATHER  
NOT SEE IT COME  
THROUGH PLEASANT GROVE  
AT ALL, SO EITHER  
TAKE IT DOWN RIEGO  
OR STAY OUT OF  
SUTTER COUNTY & PLEASANT  
GROVE, THE RESIDENCE  
IN PLEASANT GROVE DON'T  
WANT IT GOING THROUGH  
OUR TOWN, AND HAVE AN  
NICE DAY.



PLACER PARKWAY  
CORRIDOR PRESERVATION

RECEIVED

MAR 16 2009

P.C.T.P.A.

# Comment Card

Public Hearing For Comments on the  
Partially Revised Draft Tier 1 EIS/EIR -- Placer Parkway Corridor Preservation Project

Placer County Board of Supervisors Chambers (The Domes)  
February 25, 2009 - 10:45 a.m.

Please use the space below and at the back to provide your comments regarding the Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project:

I-038-001

WE OWN PROPERTIES @ 3998 AND 4000 KEYS ROAD, PLEASANT GROVE, CA. 95668. ALTERNATIVE 3 AND 4 COME VERY CLOSE WITH ALTERNATIVE 5 ACTUALLY TOUCHING THE CORNER OF THE 4000 PROPERTY. OUR LIFESTYLE AND THE WILDLIFE THAT FREQUENT THE PLEASANT GROVE CREEK DRAINAGE WOULD BE GREATLY IMPACTED. THE DEVELOPERS SHOULD CONTAIN THIS PROJECT IN THE MIDDLE OF THEIR OWN LANDS TO MINIMIZE NEGATIVE EFFECTS TO ESTABLISHED RANCHES AND HOMESTEADS. WE VEHEMENTLY OPPOSE ALTERNATIVES 3, 4 AND 5 OF YOUR PROJECT. DAN RISSE, SUZANNE RISSE, GREG RISSE, MICHELE RISSE, COLE RISSE, CHANTZ RISSE

Please turn this card in today or send it and other written comments to:  
Celia McAdam, Executive Director - PCTPA, 299 Nevada St., Auburn, California  
95603 pctpa@pctpa.net, or use the pre-addressed envelope provided at the meeting  
(please note that you will still need to attach the appropriate postage)

I-038-001

The commenter's express opposition to specific alternatives. This comment is noted. Please note that Sutter County has expressed a strong preference for a connection to State Route (SR) 70/99 at Sankey Road (please see Comment Letter L-019). Please see response to Comment I-027-006, which discusses the alternatives analysis process that led to the selection of a Parkway connection with SR 70/99 at Sankey Road as one of two potential connections among the five build alternatives. Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**Sue Sholtis**

---

**From:** laurie d seifert [l.seifert@juno.com]  
**Sent:** Sunday, January 25, 2009 5:42 PM  
**To:** pctpa@pctpa.net  
**Subject:** Placer Parkway

**I-039-001** | I live off Sunset Blvd. on Amoruso.  
I am concerned about the traffic and noise if you come over to Sunset with this parkway?

**I-039-002** | How will we enter the Parkway?

**I-039-003** | When will you start to build the Parkway?

**I-039-004** | Can you go over to E. Catlet bypassing Sunset Blvd?

**I-039-005** | When will you make the finale decision?

Thank you  
Laurie Seifert

Quality carpet cleaning at the right price. Click now for more info.  
<http://thirdpartyoffers.juno.com/TGL2141/fc/PnY6rwlqEKoWEkxksHOWtcuCOmF7ymU6qZUCqFicCqBhXplBfk8U/>

**I-039-001**

The commenter's concerns regarding noise and traffic off of Sunset Boulevard West at Amoruso are noted. Please see Figures 4.10-7 through 4.10-11 in Section 4.10 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. These figures depict the likely worst-case impacts related to noise, before mitigation, and assuming that the Parkway could be located at either edge of the corridor for each alternative. It is apparent from these figures that a small portion of the Amoruso Acres community could potentially be affected (i.e., could potentially experience a substantial noise increase), before application of mitigation measures.

Section 4.8 of the Draft Tier 1 EIS/EIR describes future potential impacts of the Parkway on local traffic conditions. As stated in Section 1.3.2 of the Draft Tier EIS/EIR, the Parkway would be designed to reduce future congestion on the local roadway network. Section 1.4.5.3 of the Draft Tier 1 EIS/EIR describes projected future local roadway conditions, including those on Sunset Boulevard West. The traffic analysis (Section 4.8.3.3) shows that the Parkway would significantly reduce future congestion on the local roadway network, including Sunset Boulevard West. Table 4.8-29 identifies that, in 2020, the estimated daily traffic volumes on Sunset Boulevard West, west of Brewer Road and east of Fiddymment Road, would result in approximately 500 to 700 fewer vehicles with the Parkway than without the Parkway. Table 4.8-26 identifies that, west of Fiddymment Road in 2040, the estimated daily traffic volumes would vary from an increase of 600 vehicles to a reduction of 100 vehicles with the Parkway as compared to without the Parkway near Fiddymment Road (depending on the alternative), and would result in approximately 5,400 to 6,900 fewer vehicles with the Parkway than without the Parkway east of Brewer Road.

At the Tier 2 phase of the project, the environmental analysis would include an evaluation of specific impacts for the actual roadway



alignment alternatives. This would include the identification of potential impacts at the local level, including the assessment of impacts on specific properties. The Tier 2 document will identify specific measures, such as adjustment of the alignment of the roadway within the corridor, or implementation of mitigation measures, including landscaping, to decrease environmental impacts such as noise.

**I-039-002**

Access to the Parkway would be possible via five or six interchanges, depending on the alternative selected. These would be constructed as part of the project and are described in Section 2.2.3 of the Draft Tier 1 EIS/EIR. Please see particularly the last paragraph of this section, which addresses the realignment of Sunset Boulevard West at the proposed Placer Parkway/Fiddymont Road intersection. This realignment would allow vehicles traveling east along Sunset Boulevard West to access Fiddymont Road and then Placer Parkway.

**I-039-003**

The construction of the Parkway would not begin until appropriate funding is secured (please see Section 3.4.1 of the Draft Tier 1 EIS/EIR and response to Comment B-002-021) and the exact schedule is not yet known. For planning purposes the opening year of the Parkway is anticipated to be 2020. Actual construction of the Parkway will not begin until the Tier 2 environmental analysis is complete.

**I-039-004**

None of the Parkway alternatives would extend as far north as East Catlett Road.

**I-039-005**

The final decision regarding an approved alternative for Tier 2 analysis of the Parkway will be made by the South Placer Regional Transportation

Planning Authority (SPRTA) with input from the Sutter County Board of Supervisors following publication and certification of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR, respectively, in late summer 2009. Following such action, the Federal Highway Administration will provide a Record of Decision announcing its determination.

**Sue Sholtis**

---

**From:** Dean Taketa [dean\_taketa@yahoo.com]  
**Sent:** Saturday, January 31, 2009 8:25 AM  
**To:** pctpa@pctpa.net  
**Subject:** Celia McAdam Teir 1 EIS/EIR 65 bypass

**I-040-001**

Great job on creating the alternatives and agree with alternative 1 to alleviate traffic and also allow for future growth along the area. Is Pleasant Grove Blvd or Blu Oaks Blvd going to have extensions and interchages if so???

**I-040-002**

Terrific response to the future traffic problems this growing area is going to incur. I'm sure Thunder Valley is very suppotive with easier access to the Casino:)

**I-040-001**

The commenter expresses a preference for a specific alternative. This comment is noted. All alternatives meet the Purpose and Need of the project. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

Please see response to Comment I-034-002. An extension of Blue Oaks Boulevard could be proposed by others in lieu of and in approximately the same place as the potential future Watt Avenue extension and interchange, but two interchanges would not be allowed.

**I-040-002**

This comment is noted.

2/24/2009

**Sue Sholtis**

---

**From:** Celia Ziegler [cnziegler@hotmail.com]  
**Sent:** Monday, February 23, 2009 2:38 PM  
**To:** pctpa@pctpa.net  
**Subject:** Draft Tier 1 EIS/EIR

Dear Ms Celia McAdam:

**I-041-001**

I'm writing you to offer my input on the planned Placer Parkway alternatives. I prefer alternative 4, with alternative 1 my second choice.

Sincerely,

Celia Ziegler  
1417 Farmgate Circle  
Roseville, CA 95747

---

Windows Live™: Discover 10 secrets about the new Windows Live. [View post.](#)

**I-041-001**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

2/24/2009

1 prefer. But we're here to give you the opportunity to  
2 present your comments tonight. We do have forms that  
3 you can fill out. Really the, purpose of doing is that  
4 we do have this information correct for our record. So  
5 that's why we are asking you to fill out speaker cards.

6 But if anybody is interested in presenting at  
7 this point, this is the time.

8 I see a dozen and a half people, here and  
9 nobody wants to make a comment?

10 MEMBER HILL: Come on up.

11 CHAIRPERSON UHLER: If you want to go ahead and  
12 make your comment first and then just submit some  
13 information, so we have your name for the record and  
14 contact information, because we need to be able to  
15 respond to the comments that are issued. That's all.

16 So at this point, just give your name and  
17 address, that will be good enough for now.

18 MR. BURKE: My name is Chris Burke, 6623 Locust  
19 Road, Pleasant Grove.

20 I just came from a meeting about the rezoning  
21 in south Sutter County; couldn't hear hardly anything.  
22 But did I hear you say that your conclusion is that  
23 Route 5 or No. 5 is the better route, or Route 4?

24 CHAIRPERSON UHLER: Do you want to go ahead and  
25 answer the question, since it's not an opinion? It's

22

DIAMOND COURT REPORTERS (916) 498-9288

**I-042-001**

*(Comments made at Public Meeting in Yuba City on February 23, 2009.  
Commenter: Chris Burke. See Appendix B for full public meeting  
transcript.)*

The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, Section 5.19.4, concluded that as a result of the California Environmental Quality Act (CEQA) analysis, Alternative 4 was the Environmentally Superior Alternative under CEQA. Additional data updates presented in Section 3.6.6 in the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD) revised this conclusion to determine that Alternative 5 was the Environmentally Superior Alternative under CEQA. The project sponsors—Federal Highway Administration and South Placer Regional Transportation Authority—did not, however, make a conclusion with respect to recommendation of a preferred alternative in the Draft Tier 1 EIS/EIR or in the PRD, wanting to review all comments received by jurisdictions, agencies, and the public. Please also see Chapter 2 and Appendix A of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

I-042-001

1 All right. At this point, we'll go ahead and  
2 open the public comment portion of this. Has anybody  
3 submitted any request cards to you?

4 SENIOR PLANNER TIDMAN: I haven't seen any.

5 CHAIRPERSON UHLER: Is there anybody here that  
6 wants to address the item, go ahead and please step up  
7 to the microphone and state your name and address,  
8 please.

9 Sir, you indicated you wanted to speak. This  
10 is the time.

11 MR. BURKE: Yes, I'm back. My name is Chris  
12 Burke. Pleasant Grove, Locust Road, 6623.

13 After the meeting the other night in Yuba City,  
14 I talked to my supervisor.

15 My questions were, why are you guys imposing a  
16 thousand-foot right-of-way through my property instead  
17 of a five hundred.

18 Secondly, why is Sankey Road being disturbed,  
19 instead of going north of Sankey Road, similar to what  
20 you were doing on Riego Road?

21 While I was at this Sutter meeting there, at  
22 the board of supervisors, they have problems with their  
23 development on the Sankey Gap, which contributes to  
24 flooding, which is a direct result of Placer County.  
25 They need a conveyance water down Sankey Road, or

17

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#### I-043-001

(Comments made at Public Meeting in Auburn on February 25, 2009.  
Commenter: Chris Burke. See Appendix B for full public meeting  
transcript.)

The 500-foot-wide corridor, within which the Parkway would be constructed, recognizes that the lands at the western and eastern ends of the Parkway are planned for development, and hence opportunities for maintaining a visual open space concept, and preserving open space, agricultural uses, and biological resources along the Parkway are more limited and would not be as practical. The 1,000-foot-wide corridor is located in areas which are primarily designated as agricultural. Please see response to Comment B-009-002, which discusses opportunities for continuing existing uses within the no-development buffer area under some circumstances.

#### I-043-002

Please see response to Comment I-027-006, which discusses the alternatives analysis process that led to the selection of a Parkway connection with State Route (SR) 70/99 at Sankey Road as one of two potential connections among the five build alternatives.

Potential impacts on hydrology and floodplains, including flooding, are discussed in Section 4.11.3 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. Measures that would be implemented to reduce these impacts are described in Section 4.11.4.

At the Tier 2 phase of the project, the environmental analysis would include an evaluation of impacts for the actual roadway alignment in more detail. The Tier 2 document will identify specific measures, such as adjustment of the alignment of the roadway within the corridor, or implementation of mitigation measures, including roadway design

I-043-001

I-043-002

I-043-002

1 alongside Sankey Road, down to their ditch, which they  
2 plan on expanding. Now, that was one of their options,  
3 to mitigate. Because in '86, their mitigation ponds  
4 that they have allocated or identified, they filled up  
5 in a matter of minutes in '86. When they plugged Sankey  
6 Gap, they breached those levees and those people had to  
7 walk out in 4 feet of water. They were flooded within a  
8 half hour, the same height as the East Canal. So that's  
9 another concern.

I-043-003

10 And you're impacting with people's property  
11 with that realignment. I know of three or four of us  
12 that do not want that realignment on our property, and  
13 we have not been asked. And that was -- just till a  
14 month or so, that's the first realignment phase I have  
15 ever seen of that, doing that.

I-043-004

16 The other question is, you plan on -- if I am  
17 correct on hearing at the last meeting, Riego Road would  
18 be built out to six lanes, to 70, and now you are going  
19 to put six more lanes over to 70 and 99? That is a  
20 four-lane road. I won't get on that road until after  
21 10 o'clock in the morning as it is, because the traffic  
22 is at a crawl at Riego Road. I don't understand --  
23 first phase ought to be to improve 70/99 to handle your  
24 traffic that you plan on putting on.

25 I think there's a little more thought here that

18

DIAMOND COURT REPORTERS (916) 498-9288

features such as bridges, and water control structures such as retention basins, to decrease potential flooding impacts, as warranted.

#### I-043-003

The Draft Tier 1 EIS/EIR acknowledges that properties would be impacted with the realignment of Sankey Road (please see page 4.2-21). The project planning history is described in Section 2.4 of the Draft Tier 1 EIS/EIR, and the Sankey Road realignment was identified about midway during this process. The Parkway environmental review process has involved an extensive public participation program, which is documented in the Draft Tier 1 EIS/EIR (please see Appendix A). This program included mass-mailings of informational notices and newspaper announcements prior to public meetings to a wide variety of stakeholders in the study area, including all property owners. The program also included numerous public meetings, including meetings in 2003 and 2004 in both Roseville and Pleasant Grove, in 2007 in both Yuba City and Roseville, and in both Yuba City and Auburn in 2009.

#### I-043-004

As noted in response to Comment I-027-002, the Draft Tier 1 EIS/EIR indicates that (1) SR 70/99 between I-5 and Riego Road would operate at level of service (LOS) F conditions under the No-Build Alternative (i.e., even without Placer Parkway), (2) Placer Parkway would cause a substantial ("significant" under CEQA) impact on this freeway segment, and (3) several Tier 2 mitigation considerations were identified that would reduce the Parkway's impacts on SR 70/99. Improvements would include an interchange, and as Sutter Pointe Specific Plan development occurs, this would likely trigger auxiliary lanes (Caltrans, 2009).

Please see response to Comment I-043-002 regarding flooding.

1 needs to be thought out, myself. And I don't know what  
2 the time frame overall -- if you are talking five years,  
3 ten years, or whatever. But kind of like you are  
4 getting the cart before the horse on this problem of 70  
5 and 99. And then realigning Sankey Road, then you have  
6 a problem with the drainage that everybody on the east  
7 side of that east levee drain canal is impacted greatly.  
8 Their property values are diminished because of the  
9 flooding. That's -- I think I have said what I need to  
10 say.

11 CHAIRPERSON UHLER: Thank you for your comment,  
12 sir. If anything happens -- they are being recorded.  
13 But if you would also like to submit your comments in  
14 the form of a letter, that will be welcomed.

15 MR. BURKE: I have.

16 CHAIRPERSON UHLER: Perfect. Thank you very  
17 much.

18 MR. BURKE: Thank you.

19 CHAIRPERSON UHLER: Anybody else?

20 MR. HARMONEY: Yes. My name is Robert Harmony  
21 and I live at 3238 -- 5205 South Brewer Road. And my  
22 concern is, our property is a quarter of a mile wide,  
23 1320 feet, and if you take a thousand -- and it's a mile  
24 deep. If you take a thousand foot away from me, it's  
25 going to leave me 320 feet wide by 5,280 feet long.



1 needs to be thought out, myself. And I don't know what  
2 the time frame overall -- if you are talking five years,  
3 ten years, or whatever. But kind of like you are  
4 getting the cart before the horse on this problem of 70  
5 and 99. And then realigning Sankey Road, then you have  
6 a problem with the drainage that everybody on the east  
7 side of that east levee drain canal is impacted greatly.  
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16 CHAIRPERSON UHLER: Perfect. Thank you very  
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18 MR. BURKE: Thank you.

19 CHAIRPERSON UHLER: Anybody else?

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23 1320 feet, and if you take a thousand -- and it's a mile  
24 deep. If you take a thousand foot away from me, it's  
25 going to leave me 320 feet wide by 5,280 feet long.

19

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#### I-044-001

*(Comments made at Public Meeting in Auburn on February 25, 2009.  
Commenter: Robert Harmony. See Appendix B for full public meeting  
transcript.)*

The commenter describes that his property, located on South Brewer Road, could be substantially reduced in value for farming and cattle raising. This comment is acknowledged. Please also see response to Comment B-009-002, which discusses the potential for continued farming in the no-development buffer area outside of the roadway. Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

I-044-001

I-044-001

1 That's not going to be of much value as far as farming,  
2 and we do raise cattle.

I-044-002

3 The other concern I have is that currently,  
4 there's very little maintenance done along the roadways  
5 out in that area. The roads are very rough, a lot of  
6 potholes.

7 If we have a thousand foot of buffer zone,  
8 who's going to take care of it? What's it going to do  
9 for the grass, the weeds, the seeds, the fire hazard  
10 that is going to be a problem to the farmers and  
11 residents in those areas.

I-044-003

12 The decision -- you know, we don't know if  
13 there's going to be cloverleaves, if we're going to be  
14 dumping a lot of traffic onto the county roads that are  
15 out there now. But with the addition of this  
16 thoroughfare, whether it's going to be considerable more  
17 traffic. And, you know, us farmers, we have to get our  
18 equipment from one field to the next, and currently it's  
19 done on the county road.

20 And if we have more traffic -- well, currently,  
21 it's very difficult because we get out there and move  
22 something, why, we can't hardly -- we don't have enough  
23 time to get off the road before the people want to get  
24 around us. You know, they take some, you know, really  
25 unnecessary risks to get past us, and they are very

20

DIAMOND COURT REPORTERS (916) 498-9288

### I-044-002

Section 2.2.4 of the Draft Tier 1 EIS/EIR discusses the no-development buffer zone and potential maintenance approaches, including the use and maintenance of landscaping. Maintenance of the buffer would be the responsibility of the buffer's landowner or the easement holder, depending on the terms of the easement. The document also acknowledges that agricultural uses may continue in the buffer zone. This issue will be more comprehensively evaluated at the Tier 2 stage of analysis.

### I-044-003

Please see response to Comment I-039-001, which discusses potential traffic impacts on the local roadway network. The conclusions are similar for Brewer Road, as shown on Figures 4.8-11 through 4.8-15 of the Draft Tier 1 EIS/EIR, which graphically depict projected improvements in traffic flow on the local roadway system.

1 unhappy with us.

2           So if we have additional traffic, boy, that's  
3 going to be a real problem for us.

4           And I do thank you for your consideration, and  
5 thank you.

6           CHAIRPERSON UHLER: Thank you for your input.

7           Anybody else? All right.

8           Seeing none, any members of the board have any  
9 comments for staff?

10          Okay. We'll go ahead and close the public  
11 hearing, but I want to remind folks that the public  
12 comment period doesn't close until the end of business  
13 on Monday the 16th of March. So please, we encourage  
14 you to submit your comments to our staff. Submittal  
15 mechanism information is in the back.

16          And with that, I don't believe any action is  
17 required of our board at this point, so we will go ahead  
18 and move on to our next agenda item, Item G.

19          (The public hearing adjourned at 11:15 a.m.)

20

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22

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24

25

May 11, 2009

Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, Ca 95603  
(530) 823-4030 FAX (530)823-4036  
[pctpa@pctpa.net](mailto:pctpa@pctpa.net); [cmcadam@pctpa.net](mailto:cmcadam@pctpa.net);  
[stidman@pctpa.net](mailto:stidman@pctpa.net)

RECEIVED

MAY 12 2009

P.C.T.P.A.

**SUBJECT:** Placer Parkway Corridor Preservation Tier 1  
Extension on Revised Draft Environmental Impact  
Statement/Program Environmental Impact Report. SCH  
#2003092069

Dear Agency Representatives,

Thank you again for the opportunity to comment on the  
Placer Parkway Tier 1 Revised Draft EIS/EIR.

Please reference my letters dated September 2007 and March  
2009 on the DEIS/DEIR.

Having followed the Placer Parkway project the last several  
years, these comments are being provided to restate my  
concerns and share my frustration.

I-045-001

Has it been predetermined that Alternative 5 will be the  
selected Placer Parkway Corridor? If this is the case,  
doesn't Alternative 5 limit the use and benefit to West  
Roseville/Placer County? Doesn't this mean that the Placer  
Parkway Corridor will become more of a use and benefit to  
Sutter County? While it is recognized that the PP Corridor  
will take some traffic and congestion coming from the  
north/Lincoln and above down to Rocklin off Hwy 65 & 80,  
how does it provide an added Expressway/Hwy for traffic  
circulation relief for the residents of Roseville?  
Isn't the concentration and density of population in West  
Roseville/Placer County greater with a greater need for an  
added circulation solution than that of Sutter County?  
Please analyze and proved the population numbers that would  
benefit from the use of the PP by the each of the various  
Alternatives.

I-045-002

I-045-003

#### I-045-001

Please see response to Comment I-035-010. At the time of publication  
of the Placer Parkway Corridor Preservation Partially Revised Draft Tier  
1 EIS/EIR, no alternative was predetermined or selected. All alternatives  
benefit West Roseville and Placer County, as well as Sutter County, as  
described in Section 4.8.3 of the Placer Parkway Corridor Preservation  
Draft Tier 1 EIS/EIR. Please note that both Placer County and the City  
of Roseville have expressed support for Alternative 5 (please see  
Comment Letters L-014 and L-017, respectively).

#### I-045-002

Please see response to Comment I-035-004.

#### I-045-003

Please see response to Comment I-035-007.

I-045-004

Added to my frustration, is a concern that the limited access conceptually only provides a couple interchanges for the West Placer residents. While extending Watt Avenue can potential provide another interchange, how will this be accomplished? Potentially, How and where will the Watt Avenue extension occur? The approval of the Regional University seems to eliminate not only the Placer Parkway Alternative 1 Route but also seems to eliminate a route for the extension of Watt Avenue, please address this. I understand the design is part of the Tier 2 EIR process, however the concepts of traffic circulation and routes should be evaluated and considered in the Tier 1 EIR. The current traffic analysis for Watt Avenue appears to be flawed without adequate information on where the Watt Avenue route will be located. Will Watt Avenue have to extend through Sierra Vista, Creekview and West Roseville Specific Plans (West Side Drive?) to become an Interchange for the Placer Parkway Corridor? Please analyze and evaluated these potential traffic patterns. Is a Watt Avenue extension possible or how will the Watt Avenue extension occur? Please explain, analyze and give examples. This extension is needed to support any of the PP Corridor Alternatives.

I-045-005

**CONCLUSION & PREFERRED CORRIDOR ALTERNATIVE:**

I-045-007

I still recommend Alternative 1 for selection as the Placer Parkway Preservation Corridor.

I-045-008

Again, Please note: There will be challenges to any Alternative that is selected, along with strong differences of opinion, but I feel Alternative 1 could potentially best serve West Placer/Roseville.

I-045-009

Please notify me and provide a copy of the FEIS/FEIR and any Technical Appendix when it's circulated. Thank you.

Sincerely,

Jan McKinsey  
8085 Stagecoach Circle  
Roseville, Ca 95747  
(916 783-9211)

(These comments were provided by email to meet the deadline)

**I-045-004**

Please see response to Comment I-035-008.

**I-045-005**

Please see response to Comment I-035-008.

**I-045-006**

The traffic analysis for Watt Avenue presented in Chapter 7 of the Draft Tier 1 EIS/EIR does not depend upon identification of an exact alignment of a future Watt Avenue extension. Because neither a Watt Avenue extension nor a Watt Avenue connection to Placer Parkway is proposed, the analysis requested by the commenter is beyond the scope of the Draft Tier 1 EIS/EIR. Please also see response to Comment I-035-006.

**I-045-007**

The analysis in the Draft Tier 1 EIS/EIR does not support the commenter's assertion that a Watt Avenue extension is needed to support any of the Parkway alternatives (please see Section 4.8.3).

**I-045-008**

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**I-045-009**

Please see response to Comment I-035-012.

Sue Sholtis

From: Loren Cook [loren\_cook@surewest.net]  
Sent: Friday, March 20, 2009 9:06 PM  
To: pclpa@pclpa.net  
Subject: Placer Parkway Corridor Preservation Project

Dear Ms McAdams,

My name is Loren Cook. I am President of the WestPark – Fiddymment Farm Neighborhood Association (WFFNA) board, organized under the Roseville Coalition of Neighborhood Associations (RCONA). WestPark and Fiddymment Farm are two new, very large housing developments in northwest Roseville. Presently there are well over 1500 families that live in the two developments. In the future, that number will increase tenfold.

All the residents of WFFNA have an interest in the location of the Placer County Parkway. I recognize that we are responding after the cutoff date. We are a fairly new organization still dealing with organization issues and we let this important item slip between the cracks. We respectfully ask that you consider our submission.

I-046-001

The 11-member WFFNA board unanimously supports Alignment Alternative #5. We have a general membership meeting scheduled for the end of March and I anticipate that the vast majority of homeowners will similarly support Alternative #5. I will be happy to report back to you in early April with specifics, if you want.

We acknowledge the importance of an East-West traffic corridor to provide access to the airport, especially for residents to the North (Lincoln) and East (Rocklin). We believe that all five alternatives very nicely satisfy this need. Additionally, we do not see that any one alignment offers any real transportation value to our communities over any other and that within the parameters of the various alternatives, slightly farther away is better. Therefore, our association strongly supports Alternative #5. I have listed several more specific reasons for our recommendation below for your consideration.

I-046-002

1. Alternative 5 will have less noise impact, especially to residents in the northwest areas of WestPark and Fiddymment Farm.
  2. Alternative 5 will minimize the exhaust emissions impact on our neighborhoods, parks, bike trails, creeks, streams, ponds and open spaces already stabilizing from these ongoing developments.
  3. Alternative 5, being farther away from our neighborhoods will lessen "incidental access" by drivers who take a wrong exit and mistakenly end up frustrated in a neighborhood.
  4. Alternative 5, allows traffic to flow much smoother and thereby avoiding so many turns as in the other alternatives that will surely lead to Roseville having their own traffic congestion nightmare similar to what Sacramento has had to endure along the American River Curve.
  5. Alternate 5 will be an ideal alignment for the new regional university—not too close, not too far away.
  6. Last, and perhaps most important to individual homeowners, most of us that live in WestPark and Fiddymment Farm purchased our homes before real estate values plummeted this past year. Hopeful that we have hit the bottom, we now look forward to a gradual return to previous values.
- We believe aligning the parkway farther to the north will create less of a negative on our recovering property values.

Thank you in advance for accepting our late submission.

Loren Cook  
President, WFFNA

3/23/2009

### I-046-001

The commenter expresses the support of the West Park–Fiddymment Farm Neighborhood Association (WFFNA) for a specific alternative. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

### I-046-002

The commenter expresses a preference for a specific alternative. This comment is noted. Please see Chapter 2 of this Final Tier 1 EIS/EIR.



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

RECEIVED

MAR 18 2009

P.C.T.P.A.

# Comment Card

Public Hearing For Comments on the  
Partially Revised Draft Tier 1 EIS/EIR – Placer Parkway Corridor Preservation Project

Placer County Board of Supervisors Chambers (The Domes)  
February 25, 2009 – 10:45 a.m.

Please use the space below and at the back to provide your comments regarding the Partially Revised Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project:

I-047-001

**The following comments and concerns are from Robert Harmony, address 5205 south brewer road Pleasant Grove CA. 95668. Our property was purchased by the Harmony family late 1983 early 1984, this property was purchased for agriculture use, Cattle, Irrigated Pasture and Hay. If the bypass route # 4 is selected it will destroy this property for its intended purchased usage.**

I-047-002

**We understand that route #1 Baseline road is the most desirable route by other funding agencies, this appears to have the least issues as far as environmental concerns wet lands, vernal pools and in general wild life. This route has the existing roadway, which can be widened with the least amount of funding dollars and the least amount of disruption to the area.**

I-047-003

**It is my understanding that a interchange is planed at the intersection of Baseline and Watt Ave and Watt Ave will be used as the main access to the Board approved purposed Collage project.**

I-047-004

**The other purposed routes have large areas of wetlands, very costly to build through. The idea of having the 500 and 1000 foot road way with buffer is unreal,**

I-047-005

**this extra 250 to 800 foot of buffer would be much too costly, it seems you should settle for the more environmental friendly and the lesser expensive Baseline route and get this project started. Placer County is in need of some**

I-047-006

**construction projects to boost our local economy.**

Please turn this card in today or send it and other written comments to:  
Celia McAdam, Executive Director – PCTPA, 299 Nevada St., Auburn, California  
95603 pctpa@pctpa.net, or use the pre-addressed envelope provided at the meeting  
(please note that you will still need to attach the appropriate postage)

## I-047-001

The commenter notes that Alternative 4 would destroy his property for its intended use (agriculture, cattle, irrigated pasture, and hay). This comment is noted. Please see response to Comment B-009-002 which discusses opportunities for continuing existing uses within the no-development buffer area under some circumstances. Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

## I-047-002

As described in Section 5.19 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, as amended by the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR, Alternative 5 was determined to have the fewest environmental impacts and is the Environmentally Superior Alternative under the California Environmental Quality Act. Alternative 1 is not proposed to be located on Baseline Road; it would be constructed approximately one mile north of Baseline Road. It would be the longest and most expensive of all build alternatives.

## I-047-003

There is currently a three-way intersection at Baseline Road and Watt Avenue. Watt Avenue does not currently extend north of Baseline Road and the Regional University Specific Plan, while assuming an eventually extension of Watt Avenue, as indicated in the Placer County General Plan, did not propose such an extension. Such an extension has been proposed as part of the Sierra Vista Specific Plan, which is not yet approved. That plan assumes a four-way intersection at Baseline Road and Watt Avenue and would be an access route to the Regional University Specific Plan, which has been approved by the Placer County Board of Supervisors.

**I-047-004**

Please see Table 4.14-4 in the Draft Tier 1 EIS/EIR, which identifies the potential loss of wetlands by alternative. Alternative 1 would potentially result in the greatest direct impacts to wetlands, and Alternative 5 would potentially result in the least amount of direct impacts.

**I-047-005**

Please see Master Response 1 regarding the proposed location of Alternative 1. Section 2.2.6 of the Draft Tier 1 EIS/EIR presents a preliminary cost estimate for the Parkway, which includes right-of-way acquisition for the Parkway and the no-development buffer. Please also see response to Comment F-002-001, which provides additional information concerning the buffer.

**I-047-006**

The commenter expresses the opinion that the project should get started for economic reasons. This comment is noted.



May 10, 2009

RECEIVED

MAY 11 2009

P.C.T.P.A.

Placer County Transportation  
Planning Agency  
299 Nevada Street  
Auburn, CA 95603

Attn: Celia McAdam, Executive Director

Subject: PLACER PARKWAY CORRIDOR PRESERVATION PROJECT

I-048-001

The purpose of this letter is to request that you consider development of Reigo Road (Alternatives 1 through 3), rather than Sankey Road (Alternatives 4 and 5), for the proposed Placer Parkway, connecting highways 65 and 99.

The reasons for this request are several. First, it is our understanding that a freeway interchange cloverleaf is proposed to be constructed at Reigo Road and Hwy 99. The area of Reigo Road is more suited to handle the significant increase in traffic for commuters, commercial and industrial traffic, as it is already built up to some degree. In comparison, Sankey Road is primarily agricultural and residential so the huge increase in traffic would have a major negative impact to the rural areas surrounding Sankey Road. It is also understood that land developers are primary responsible for the push to develop Sankey Road, which would give them a major new foothold for future housing and commercial/industrial land development.

I-048-002

My family has owned land on Sankey Road for over 150 years. My great-great grandfather settled in Sutter County in 1857 and in 1867 was elected Sutter County Assessor. Based on our review of the suggested alignment of the Sankey Road expansion alternative, it appears the connecting corridor would take a large swath of our property which would be devastating to the character and flora of the property as it would take out the original residence and the surrounding 150 year old trees, etc. As already mentioned, Sankey Road is primarily agricultural and residential and a very quiet country area. Development of this type would destroy the rural atmosphere and "pave" the way for strip malls, gas stations, convenience stores, low cost housing developments, fast food joints, noise, traffic jams and the like and the inevitable undesirable elements such as gangs. America has already lost too much of its precious agricultural land. It is also noteworthy that Sankey Road remains a beautiful habitat for wildlife, which is being squeezed out between the major development forces of Highways 65 and 99.

I-048-003

Again, to reiterate, we are asking you to abandon consideration of Sankey Road expansion Alternatives 4, 5 and choose Reigo Road Alternatives 1, 2, or 3 to expand for the connecting corridor.

Sincerely,

Diane Lanni  
4207 California Ave  
Norco, CA 92860  
951-520-0711

### I-048-001

An upgrade to the existing Riego Road/State Route (SR) 70/99 Interchange is planned as a separate project by the California Department of Transportation (Caltrans) and Sutter County. The Placer Parkway project proposes three alternatives that would connect with SR 70/99 approximately one-half mile north of Riego Road, and two alternatives that would connect at Sankey Road, as described on pages 2-2 and 2-3 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR. Please also see response to Comment B-005-002.

Placer Parkway would cross areas zoned for agriculture in Placer County and Sutter County, and the area planned for development in Sutter County known as the Sutter Pointe Specific Plan (SPSP), under all alternatives. Within the SPSP, this area will no longer be agricultural in nature. The Draft Tier 1 EIS/EIR acknowledges that alternatives connecting to SR 70/99 at Sankey Road would impact residences and farmsteads along Sankey Road (page 4.2-22). The Placer Parkway Corridor Preservation Partially Revised Tier 1 EIS/EIR (PRD) identifies that, in the Western Segment, less farmland would be affected under alternatives connecting to SR 70/99 at Sankey Road than under alternatives connecting at north of Riego Road (please see Revised Table 4.4-8 on page 25 of the PRD).

The recently approved SPSP will result in development along both the Riego Road and Sankey Road corridors. The proposed Parkway interchange at Sankey Road would be generally consistent with the approved SPSP. Please also note that one of the purposes of Placer Parkway is to "advance economic development goals in southwest Placer County and south Sutter County" (page 1-7). One such area is the SPSP area, which is identified as an industrial growth area in the Sutter County General Plan, to which Placer Parkway will "improve regional accessibility for businesses and jobs in the project vicinity, including access to SR 70/99" (page 1-8).

**I-048-002**

It is acknowledged that a Placer Parkway along Sankey Road would change the rural atmosphere on Sankey Road. Please note that no interchanges are proposed along the Parkway in the vicinity of Sankey Road except for those within the SPSP, which has been approved by the Sutter County Board of Supervisors. Outside of this area, the lack of access to the Parkway would inhibit development, as would the agricultural zoning designation. The Draft Tier 1 EIS/EIR acknowledges the loss of agricultural land and wildlife habitat associated with the Parkway.

Please see response to Comment B-009-002, which discusses opportunities for continuing existing uses within the buffer area under some circumstances. Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**I-048-003**

The commenter expresses a preference for specific alternatives. This comment is noted. Please see Chapter 2 of this Final Tier 1 EIS/EIR.

RECEIVED

MAR 26 2009

P.C.T.P.A.

**B. Chris and Christy McKenzie**  
PO BOX 603  
PLEASANT GROVE, CA 95668  
Office: 916-655-3367  
Cell: 916-709-7885  
Cell: 916-709-0233  
Fax: 916-655-3344

March 25, 2009

Placer County Transportation Planning Agency  
Celia McAdam, Executive Director  
299 Nevada Street  
Auburn, California

Dear Ms. McAdam:

**Re: Follow up on meeting to discuss my EIS/EIR comments and attachments of March 3, 2009. I appreciated the opportunity to meet in person with Mr. Tidman (March 11, 2009) to better convey the mechanical and economic problems for me and my farming operation created by the "conceptual" alignment as depicted in option #4 and #5.**

I felt valuable information was conveyed regarding the actual lay of the land, facilities and use. We also discussed your indeterminate time line and the possible impact on my home, environment, wildlife and quality of life. He said that such comments would be addressed in the EIS/EIR and should be included in my letter.

I have built and lived in my home since 1985 and have enjoyed the quiet, night sky, and enhanced wildlife associated with this property. Few can appreciate the sound of widgeon in the night sky, Hoot-hoot of great horned owls, roar of a thousand feeding waterfowl, and the crows of multiple rooster pheasants. In addition to there being more avian species and usage than 25 years ago, I now have river otter, beaver, and mink. Although mosquitoes and the vagaries of seasons on the farm may not appeal to some, it has taken a lifetime to build and provides independence and serenity.

I also farm property on Riego Road and know first hand the damage created over recent years as traffic increased from a rural farm road to major commuter and freight route. We have "lost" the use of all three access points on that mile of frontage on Riego Rd. In addition the constant noise and lights have rendered the area within one half mile useless for duck hunting. There are three "Blinds" in the

**I-049-001**

The commenter acknowledges his meeting with the Parkway's project manager, Mr. Tidman, and describes the natural resources at his home. These comments are noted.

**I-049-002**

One of the purposes of the Placer Parkway project is to respond to existing and anticipated travel demand: "The proposed Placer Parkway would be designed to reduce pressure on the existing transportation network, and to address anticipated future congestion on the local roadway system in southwest Placer County and South Sutter County (Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, page 1-8). All alternatives would benefit Riego Road by concentrating through-traffic on the Parkway, which is designed to be a limited access freeway that would maintain free-flowing conditions. This is described in Section 4.8 of the Draft Tier 1 EIS/EIR. Please see Figures 4.8-11 through 4.8-15 of the Draft Tier 1 EIS/EIR for a graphical depiction of projected improvements in traffic flow on the local roadway system.

The Draft Tier 1 EIS/EIR acknowledges that the Parkway would result in noise and visual impacts near it, and identifies potential mitigation strategies to reduce those impacts. Please see Sections 4.6.5 and 4.10.4 for a description of these strategies. Please also see response to Comment I-049-003.

I-049-001

I-049-002

I-049-002

area which were the best when I was in my youth. The birds now "stay" in the fields a half mile or more from the traffic.

I-049-003

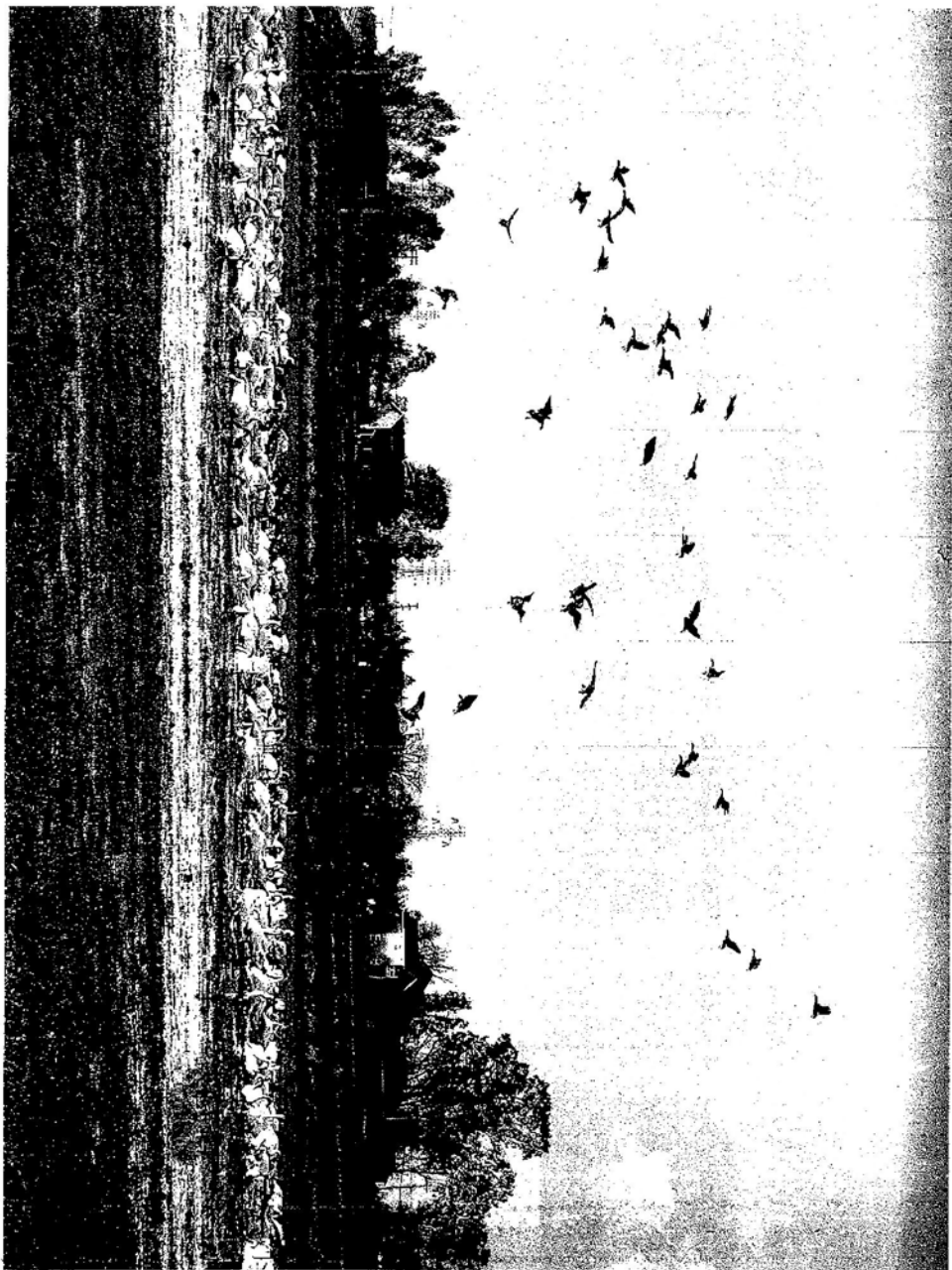
Applying this experience to the proposed 4-5 alternatives, mitigation of my losses will be substantial. My home is  $\frac{1}{4}$  to  $\frac{1}{2}$  mile north from the corridor and the noise and light pollution will be serious loss, to my life, and my property value. Will the Parkway be enclosed in Trees or other tall sound and light barriers to minimize the sound and light? I am enclosing copies of 2 additional photos of my neighbors that I made for Mr. Tidman to be included with my comments. I will again appreciate hearing from your staff and discussing the progress of your planning process.

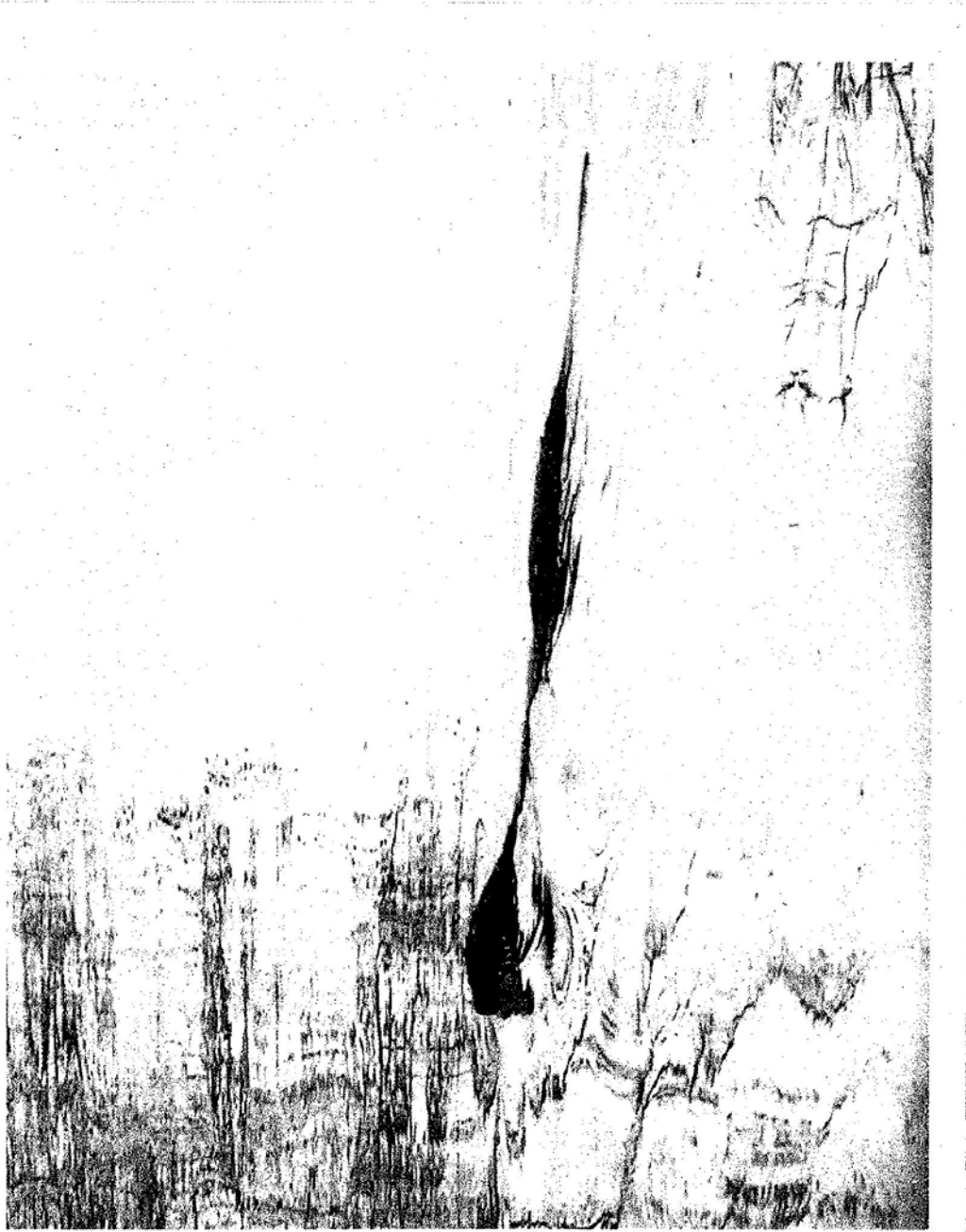
Thank you,

  
Chris McKenzie

**I-049-003**

The additional photos of the neighborhood are noted. Please see Figures 4.10-7 through 4.10-11 of the Draft Tier 1 EIS/EIR for a depiction of the acceptable noise limits (66 A-weighted decibel [dBA] noise contour) with a Parkway in the future. These figures show that noise in excess of the 66 dBA noise contour would extend approximately 500 feet beyond the edge of the corridor, and would affect some sensitive receptors. At one-quarter to one-half mile from the Parkway, noise would likely be audible but not substantial. Landscaping such as trees or other tall sound and light barriers would be considered as described in Section 2.2.5. Specific mitigation measures would be identified during the Tier 2 environmental process.







March 13, 2009

Celia McAdam  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street,  
Auburn, CA 95603

Subject: Placer Parkway Corridor Preservation Projects Partially Revised Draft Tier 1 EIS/EIR

Dear Ms. McAdam

Thank you for the opportunity to review the "Placer Parkway Corridor Preservation Project Revised Tier 1 Draft EIS/EIR". As you are aware, this project is located within the Sacramento Metropolitan Area, which is classified as a severe non-attainment area for federal 8-hour ozone standard and will be designated as a non-attainment area for federal 24-hour particulate matter (PM<sub>2.5</sub>) standards.

This environmental document serves as a supplement to the Draft EIS/EIR because there are significant new circumstances or information after the Draft EIS/EIR released on June 2007 and the lead agency considers should be included in order to meet the objectives of NEPA and CEQA.

The Placer County Air Pollution Control District (District) has reviewed this document and has the following comments:

**L-013-001**

1. The document should include updates for the new federal 8-hour average standard for ozone and 24-hour average standard for fine particulate matter (PM<sub>2.5</sub>) in Table 4.9-1 in the project's draft EIS/EIR. U.S. EPA has revised the 8-hour average standard for ozone from 0.08 ppm down to 0.075 ppm in March 2008 and the 24-hour average standard for PM<sub>2.5</sub> from 65 µg/m<sup>3</sup> to 35 µg/m<sup>3</sup> in December 2006. EPA does not determine the new area designation based on the revised ozone 8-hour average standard (0.075 ppm) but the Sacramento Region is expected to be designated as nonattainment. EPA has proposed the final area designation for the revised PM<sub>2.5</sub> 24-hour average standard in December 2008. Sacramento, portion of Placer and Sutter County will be designated as federal PM<sub>2.5</sub> Nonattainment Area.

**L-013-002**

2. The document should revise the information in Section 4.9.2.1 to include an update for the current ozone attainment planning work for the Sacramento Federal Ozone Nonattainment Area. In February 2008, the five local air district's Boards in Sacramento Region have approved and submitted a request to U.S. EPA for a voluntary reclassification to "severe" with extended attainment deadline of June 15, 2019. The Sacramento Regional Nonattainment Area 8-hour Ozone Attainment Plan (for 0.08 ppm standard) have been approved by five local air districts early this year and submitted to the California Air Resources Board (CARB) for the approval.

### L-013-001

In response to this comment, the Ambient Air Quality Standards table (Table 4.9-1) in Section 4.9 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR is updated to include the lowered federal 8-hour ozone standard of 0.075 parts per million (ppm) and to include the lowered federal PM<sub>2.5</sub> 24-hour standard from 65 micrograms per cubic meter (µg/m<sup>3</sup>) to 35 µg/m<sup>3</sup>. Revised Table 4.9-1 is included in Chapter 4 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

### L-013-002

The discussion in Section 4.9.2.1 is updated to reflect the new 8-hour ozone planning work for the Sacramento Federal Ozone Nonattainment Area and the requests by the five local air districts for re-designation from "serious" 8-hour ozone non-attainment area to a "severe" ozone non-attainment area. Revisions are included in Chapter 4 of this Final Tier 1 EIS/EIR.

L-013-003

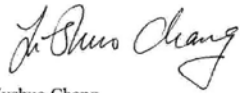
3. The project's air quality analysis should be updated based on the new mobile emission model (EMFAC 2007). CARB has released the EMFAC 2007 model for mobile emission analysis in late 2007. The EMFAC 2007 has been applied to update the on-road mobile emission estimates in the Sacramento Nonattainment Area Ozone Attainment Plan and to conduct the transportation conformity determination by the regional transportation agency. The EMFAC 2007 model has updated emission factors and other control factors; it would deliver substantially different results rather than the EMFAC 2002 model which was used for the air quality analysis in the project's Draft EIS/EIR. The District suggests that the project's revised Draft EIS/EIR should include the updated mobile emissions by using the EMFAC 2007 model to reflect the recently appropriate analysis and to be consistent with the analysis of regional air quality plan and transportation plan.

L-013-004

4. The District would suggest updating the emission estimates in Table 4.9-30 based on EMFAC 2007 mobile emission factors and including CO2 emission estimate in the table. The Draft Tier 1 EIS/EIR states that only vehicle mile travels (VMT) are used to estimate the air pollutant emissions for all alternatives versus no-build alternative comparison. None specific road alignment is selected for further analysis. However, including CO2 emission estimates in Table 4.9-30 would provide complete information to compare with the potential air quality impacts resulting from each alternative.

Thank you for the opportunity to review this proposal. If you have any questions or comments, please call me at 530-745-2325.

Sincerely,



Yushuo Chang  
Senior Air Quality Planner

### L-013-003

As requested by the commenter, the Parkway air quality analysis for Year 2020 was updated based on the new mobile emission model (EMFAC2007). The original analysis had used EMFAC2002, the California Air Resources Board (CARB) on-road emissions model that is updated periodically and that was appropriate for use at the time. Between the time that the original analysis was performed and the Draft Tier 1 EIS/EIR was being reviewed for comments, EMFAC2007 was released by the CARB.

As a result of the comments provided on the Draft Tier 1 EIS/EIR, and subsequent telephone discussions with the Placer County Air Pollution Control District (PCAPCD), PCAPCD recommended a more focused approach to the emissions estimate analysis using EMFAC2007. PCAPCD recommended using more project-specific details such as vehicle speed data in the new analysis, as compared to the more general area-wide approach taken in the original analysis. This analysis was undertaken and the results presented in revised versions of Draft Tier 1 EIS/EIR, Tables 4.9-12 through 4.9-31 and associated text, included at the end of the responses to this Comment Letter and in Chapter 4 of this Final Tier 1 EIS/EIR.

Because the updated EMFAC2007 model analysis used more specific data than the previous EMFAC2002 analysis, results from both analyses are not directly comparable. As shown in the revised tables in Chapter 4, using the EMFAC 2007 model with the PCAPCD approach results in some pollutant levels decreasing and some increasing. The overall conclusions on air quality impacts did not change and the analysis did not result in any new impacts or any increase in the severity of an impact. The increase in pollutants with the build alternatives compared to the No-Build Alternative is approximately one percent or less, depending on the alternative. Criteria pollutant emissions would remain substantial ("significant and unavoidable" under the California



Environmental Quality Act [CEQA]) impacts of operation of the Parkway under Existing Plus Project and 2020 Plus Project Conditions.

**L-013-004**

Tables 4.9-12 through 4.9-31 have been updated to include the emission estimates as described in response to Comment L-013-003, and emissions calculations for carbon dioxide (CO<sub>2</sub>) have been included. The CO<sub>2</sub> emissions levels represent a very minor increase in comparison to the No-Build Alternative. Revised tables are included in Chapter 4 of this Final Tier 1 EIS/EIR. Under the updated analysis, the proposed project's incremental emissions would still result in a cumulatively considerable contribution to this cumulatively substantial ("significant" under CEQA) impact, and this impact would therefore continue to be considered substantial ("significant" under CEQA).

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**Response to Comment L-013-001**

The tables in Section 4.9 are revised as follows. Conforming text changes are provided in Chapter 4.

**Revised Table 4.9-1  
Federal and State Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards <sup>1</sup>		Federal Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Fine Particulate Matter (PM <sub>2.5</sub> )	24 hours	No Separate State Standard		<del>65</del> <u>35</u> µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	15 µg/m <sup>3</sup>		

**Response to Comments L-013-003 and L-013-004**

**Revised Table 4.9-12  
VMT and Criteria Pollutant Emissions for No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> <del>8,900</del>	<u>52,346</u> <del>68,320</del>	<u>18,531</u> <del>9,880</del>	<u>1,869</u> <del>4,440</del>	<u>1,207</u>	<u>175</u> <del>460</del>	<u>9,458</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutant emissions are calculated using CARB's EMFAC2007 model and project-specific VMT data. Although the model does not calculate PM <sub>2.5</sub> emissions, to ensure a conservative approach PM <sub>2.5</sub> emissions can be assumed to be the same as PM <sub>10</sub> for the purposes of the analysis.								

**Revised Table 4.9-13  
VMT and Criteria Pollutant Emissions for Alternative 1 and the  
No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> <del>8,900</del>	<u>52,346</u> <del>68,320</del>	<u>18,531</u> <del>9,880</del>	<u>1,869</u> <del>4,440</del>	<u>1,207</u>	<u>175</u> <del>460</del>	<u>9,458</u>
Alternative 1	17,846,974	<u>2,660</u> <del>8,960</del>	<u>52,714</u> <del>68,640</del>	<u>18,696</u> <del>9,940</del>	<u>1,884</u> <del>4,440</del>	<u>1,218</u>	<u>177</u> <del>480</del>	<u>9,535</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutants are calculated using CARB's EMFAC2007 model and project-specific VMT data.								

**Revised Table 4.9-14  
Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 1 and  
the No-Build Alternative in 2020**

Description	VMT Increase (%)	ROG	Emissions Increase Over No-Build Alternative (%)					CO <sub>2</sub>
			CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	
Alternative 1	0.68	<u>0.9867</u>	<u>0.7047</u>	<u>0.8964</u>	<u>0.8200</u>	<u>0.89</u>	<u>0.87</u> <del>42.50</del>	<u>0.81</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutants are calculated using CARB's EMFAC2007 model and project-specific VMT data.								

**Revised Table 4.9-15  
VMT and Criteria Pollutant Emissions for Alternative 2 and  
the No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/year)
No-Build Alternative	17,725,900	<u>2,634</u> 8,900	<u>52,346</u> 68,320	<u>18,531</u> 9,880	<u>1,869</u> 4,440	<u>1,207</u>	<u>175</u> 460	<u>9,458</u>
Alternative 2	17,875,272	<u>2,667</u> 8,960	<u>52,814</u> 68,740	<u>18,735</u> 9,960	<u>1,888</u> 4,460	<u>1,221</u>	<u>1,778</u> 480	<u>9,554</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

**Revised Table 4.9-16  
Percentage Change in VMT and Criteria Pollutant Emissions  
Between Alternative 2 and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Alternative 2	0.84	<u>1.26</u> 0.67	<u>0.89</u> 0.64	<u>1.10</u> 0.84	<u>1.03</u> 4.39	<u>1.4</u>	<u>1.12</u> 42.50	<u>1.06</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

**Revised Table 4.9-17  
VMT and Criteria Pollutant Emissions for Alternative 3 and the No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> 8,900	<u>52,346</u> 68,320	<u>18,531</u> 9,880	<u>1,869</u> 4,440	<u>1,207</u>	<u>175</u> 460	<u>9,458</u>
Alternative 3	17,888,226	<u>2,669</u> 8,980	<u>52,840</u> 68,780	<u>18,747</u> 9,960	<u>1,889</u> 4,460	<u>1,222</u>	<u>177</u> 480	<u>9,560</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2002~~7~~ model and project-specific VMT data.

**Revised Table 4.9-18  
Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 3 and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Alternative 3	0.92	<u>1.30</u> <del>0.90</del>	<u>0.94</u> <del>0.67</del>	<u>1.17</u> <del>0.84</del>	<u>1.09</u> <del>1.39</del>	<u>1.19</u>	<u>1.13</u> <del>12.5</del>	<u>1.08</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutants are calculated using the Burden option in CARB's EMFAC2007 <sub>2</sub> model and project-specific VMT data.								

**Revised Table 4.9-19  
VMT and Criteria Pollutant Emissions for Alternative 4 and the No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> <del>8,900</del>	<u>52,346</u> <del>68,320</del>	<u>18,531</u> <del>9,880</del>	<u>1,869</u> <del>4,440</del>	<u>1,207</u>	<u>175</u> <del>460</del>	<u>9,458</u>
Alternative 4	17,871,573	<u>2,663</u> <del>8,960</del>	<u>52,768</u> <del>68,720</del>	<u>18,720</u> <del>9,960</del>	<u>1,887</u> <del>4,460</del>	<u>1,220</u>	<u>177</u> <del>480</del>	<u>9,545</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutants are calculated using the Burden option in CARB's EMFAC2007 <sub>2</sub> model and project-specific VMT data.								

**Revised Table 4.9-20**  
**Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 4 and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Alternative 4	0.82	<u>1.07</u> <del>0.67</del>	<u>0.80</u> <del>0.59</del>	<u>1.02</u> <del>0.81</del>	<u>0.95</u> <del>1.39</del>	<u>1.07</u>	<u>0.95</u> <del>12.50</del>	<u>0.93</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007<sub>2</sub> model and project-specific VMT data.

**Revised Table 4.9-21**  
**VMT and Criteria Pollutant Emissions for Alternative 5 and the No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> <del>8,900</del>	<u>52,346</u> <del>68,320</del>	<u>18,531</u> <del>9,880</del>	<u>1,869</u> <del>1,440</del>	<u>1,207</u>	<u>175</u> <del>60</del>	<u>9,458</u>
Alternative 5	17,874,270	<u>2,664</u> <del>8,960</del>	<u>52,789</u> <del>68,720</del>	<u>18,723</u> <del>9,940</del>	<u>1,887</u> <del>1,460</del>	<u>1,220</u>	<u>177</u> <del>180</del>	<u>9,548</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007<sub>2</sub> model and project-specific VMT data.

**Revised Table 4.9-22**  
**Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 5 and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Build – Alternative 5	0.84	<u>1.13</u> <del>0.67</del>	<u>0.85</u> <del>0.59</del>	<u>1.04</u> <del>0.61</del>	<u>0.97</u> <del>1.39</del>	<u>1.05</u>	<u>0.98</u> <del>12.50</del>	<u>0.96</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007<sub>2</sub> model and project-specific VMT data.

**Revised Table 4.9-23  
Comparison of VMT and Operational Emissions for Build Alternatives in 2020**

Description	VMT	Emissions (lbs/day)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> 8,900	<u>52,346</u> 68,320	<u>18,531</u> 9,880	<u>1,869</u> 1,440	<u>1,207</u>	<u>175</u> 160	<u>9,458</u>
<b>Total Emissions Increase Over No-Build Alternative (lbs/day)</b>								
Alternative 1	17,846,974	<u>2660</u>	<u>367320</u>	<u>16560</u>	<u>150</u>	<u>11</u>	<u>220</u>	<u>77</u>
Alternative 2	17,875,272	<u>3360</u>	<u>467420</u>	<u>20480</u>	<u>1920</u>	<u>14</u>	<u>220</u>	<u>97</u>
Alternative 3	17,888,224	<u>3480</u>	<u>494460</u>	<u>21680</u>	<u>2020</u>	<u>14</u>	<u>220</u>	<u>102</u>
Alternative 4	17,871,573	<u>2860</u>	<u>421400</u>	<u>18980</u>	<u>1820</u>	<u>12</u>	<u>220</u>	<u>88</u>
Alternative 5	17,874,270	<u>3060</u>	<u>442400</u>	<u>19260</u>	<u>1820</u>	<u>13</u>	<u>220</u>	<u>91</u>
<b>FRAQMD Significance Thresholds</b>		<b>25</b>	<b>None</b>	<b>25</b>	<b>80</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>PCAPCD Significance Thresholds</b>		<b>82</b>	<b>550</b>	<b>82</b>	<b>82</b>	<b>None</b>	<b>136</b>	<b>None</b>
Note:								
1. The net increase in emissions is calculated based on the comparison with the No-Build Alternative.								

**Revised Table 4.9-24  
VMT and Criteria Pollutant Emissions for No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> 6,060	<u>44,222</u> 44,260	<u>12,169</u> 4,960	<u>2,474</u> 2,100	<u>1,528</u>	<u>261</u> 240	<u>14,061</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutant emissions are calculated using CARB's EMFAC2002Z model and project-specific VMT data.								
3. Although the model does not calculate PM <sub>2.5</sub> emissions, to ensure a conservative approach PM <sub>2.5</sub> emissions can be assumed to be the same as PM <sub>10</sub> for the purposes of the analysis.								

**Revised Table 4.9-25  
VMT and Criteria Pollutant Emissions for Alternative 1 and the  
No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> 6,060	<u>44,222</u> 44,260	<u>12,169</u> 4,960	<u>2,474</u> 2,100	<u>1,528</u>	<u>261</u> 240	<u>14,061</u>
Alternative 1	17,846,974	<u>2,599</u> 6,160	<u>45,038</u> 44,680	<u>12,365</u> 5,040	<u>2,515</u> 2,120	<u>1,553</u>	<u>266</u> 260	<u>14,299</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutants are calculated using CARB's EMFAC2007Z model and project-specific VMT data.								



**Revised Table 4.9-26  
VMT and Criteria Pollutant Emissions for Alternative 2 and  
the No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/year)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 2	<u>26,569,226</u> <del>26,477,729</del>	<u>2,609</u> <del>6,180</del>	<u>45,156</u> <del>44,740</del>	<u>12,394</u> <del>5,060</del>	<u>2,521</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,336</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

**Revised Table 4.9-27  
VMT and Criteria Pollutant Emissions for Alternative 3 and the No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 3	<u>26,548,787</u> <del>26,488,169</del>	<u>2,608</u> <del>6,180</del>	<u>45,165</u> <del>44,760</del>	<u>12,396</u> <del>5,060</del>	<u>2,522</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,338</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

**Revised Table 4.9-28  
VMT and Criteria Pollutant Emissions for Alternative 4  
and the No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 4	<u>26,546,653</u> <del>26,482,450</del>	<u>2,610</u> <del>6,180</del>	<u>45,160</u> <del>44,760</del>	<u>12,399</u> <del>5,060</del>	<u>2,522</u> <del>2,120</del>	<u>1,558</u>	<u>267</u> <del>260</del>	<u>14,342</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

**Revised Table 4.9-29  
VMT and Criteria Pollutant Emissions for Alternative 5 and  
the No-Build Alternative in 2040**

<b>Description</b>	<b>VMT</b>	<b>ROG (lbs/day)</b>	<b>CO (lbs/day)</b>	<b>NO<sub>x</sub> (lbs/day)</b>	<b>PM<sub>10</sub> (lbs/day)</b>	<b>PM<sub>2.5</sub> (lbs/day)</b>	<b>SO<sub>x</sub> (lbs/day)</b>	<b>CO<sub>2</sub> (tons/day)</b>
No-Build Alternative	25,983,131	<u>2,542</u> 6,060	<u>44,222</u> 44,260	<u>12,169</u> 4,960	<u>2,474</u> 2,100	<u>1,528</u>	<u>261</u> 240	<u>14,061</u>
Alternative 5	<u>26,533,413</u> 26,461,066	<u>2,608</u> 6,180	<u>45,129</u> 44,720	<u>12,389</u> 5,060	<u>2,520</u> 2,120	<u>1,557</u>	<u>267</u> 260	<u>14,331</u>
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutants are calculated using the Burden option in CARB's EMFAC2007 <sub>2</sub> model and project-specific VMT data.								

**Revised Table 4.9-30  
Operational Emissions from All Alternatives in 2040**

<b>Description</b>	<b>VMT</b>	<b>ROG (lbs/day)</b>	<b>CO (lbs/day)</b>	<b>NO<sub>x</sub> (lbs/day)</b>	<b>PM<sub>10</sub> (lbs/day)</b>	<b>PM<sub>2.5</sub> (lbs/day)</b>	<b>SO<sub>x</sub> (lbs/day)</b>	<b>CO<sub>2</sub> (tons/day)</b>
No-Build	25,983,131	<u>2,542</u> 6,060	<u>44,222</u> 44,260	<u>12,169</u> 4,960	<u>2,474</u> 2,100	<u>1,528</u>	<u>261</u> 240	<u>14,061</u>
Alternative 1	26,424,662	<u>2,599</u> 6,160	<u>45,038</u> 44,680	<u>12,365</u> 5,040	<u>2,515</u> 2,120	<u>1,553</u>	<u>266</u> 260	<u>14,299</u>
Alternative 2	26,477,729	<u>2,609</u> 6,180	<u>45,156</u> 44,740	<u>12,394</u> 5,060	<u>2,521</u> 2,120	<u>1,557</u>	<u>267</u> 260	<u>14,336</u>
Alternative 3	26,488,169	<u>2,608</u> 6,180	<u>45,165</u> 44,760	<u>12,396</u> 5,060	<u>2,522</u> 2,120	<u>1,557</u>	<u>267</u> 260	<u>14,338</u>
Alternative 4	26,482,450	<u>2,610</u> 6,180	<u>45,160</u> 44,760	<u>12,399</u> 5,060	<u>2,522</u> 2,120	<u>1,558</u>	<u>267</u> 260	<u>14,342</u>
Alternative 5	26,461,066	<u>2,608</u> 6,180	<u>45,129</u> 44,720	<u>12,389</u> 5,060	<u>2,520</u> 2,120	<u>1,557</u>	<u>267</u> 260	<u>14,331</u>
Note: 1. Vehicle emissions are calculated using EMFAC2007 <sub>2</sub> mobile emission factor and methodology prescribed by CARB.								

**Revised Table 4.9-31  
Comparison of VMT and Operational Emissions for Build Alternatives in 2040**

Description	VMT	Emissions (lbs/day)						
		<u>ROG</u>	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM<sub>10</sub></u>	<u>PM<sub>2.5</sub></u>	<u>SO<sub>x</sub></u>	<u>CO<sub>2</sub></u>
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
<b>Total Emissions Increase Over No-Build Alternative (lbs/day)</b>								
Alternative 1	26,424,662	<u>57</u> <del>400</del>	<u>816</u> <del>420</del>	<u>196</u> <del>80</del>	<u>41</u> <del>20</del>	<u>25</u>	<u>5</u> <del>20</del>	<u>238</u>
Alternative 2	<u>26,569,226</u> <del>26,477,729</del>	<u>67</u> <del>420</del>	<u>934</u> <del>480</del>	<u>226</u> <del>400</del>	<u>47</u> <del>20</del>	<u>30</u>	<u>6</u> <del>20</del>	<u>275</u>
Alternative 3	<u>26,548,787</u> <del>26,488,169</del>	<u>66</u> <del>420</del>	<u>943</u> <del>500</del>	<u>227</u> <del>400</del>	<u>48</u> <del>20</del>	<u>30</u>	<u>6</u> <del>20</del>	<u>277</u>
Alternative 4	<u>26,546,653</u> <del>26,482,450</del>	<u>68</u> <del>420</del>	<u>938</u> <del>500</del>	<u>230</u> <del>400</del>	<u>49</u> <del>20</del>	<u>31</u>	<u>6</u> <del>20</del>	<u>281</u>
Alternative 5	<u>26,533,413</u> <del>26,461,066</del>	<u>66</u> <del>420</del>	<u>907</u> <del>460</del>	<u>220</u> <del>400</del>	<u>46</u> <del>20</del>	<u>29</u>	<u>6</u> <del>20</del>	<u>269</u>
<b>FRAQMD Significance Thresholds</b>		<u>25</u>	<b>None</b>	<u>25</u>	<u>80</u>	<b>None</b>	<b>None</b>	<b>None</b>
<b>PCAPCD Significance Thresholds</b>		<b>82</b>	<b>550</b>	<b>82</b>	<b>82</b>	<b>None</b>	<b>136</b>	<b>None</b>
Note:								
1. The net increase in emissions is calculated based on the comparison with the No-Build Alternative.								



**COUNTY OF PLACER**  
**Community Development Resource Agency**

John Marin, Agency Director

**PLANNING**

Michael J. Johnson, AICP  
Planning Director

March 16, 2009

Celia McAdam  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

RECEIVED

MAR 16 2009

P.C.T.P.A.

**RE: PLACER PARKWAY CORRIDOR PRESERVATION – Partially Revised Draft Tier 1 EIS/EIR Comments**

Dear Ms. ~~McAdam~~ **CELIA** -

This letter is written on behalf of the Community Development Resource Agency in order to provide you with comments on the above revised EIS/EIR for the Placer Parkway project. The proposed project is to select and preserve a corridor for the future construction of Placer Parkway, a new east-west roadway linking State Route (SR) 70/99 in Sutter County east to SR 65 in Placer County. Our comments focus on two issues: 1) Floodplain protection and conservation, and 2) growth inducement and related secondary and indirect impacts.

- L-014-001** | **Growth Inducement**  
The subject document provides a comprehensive and objective analysis of the potential for the selected Placer Parkway alternative to induce growth within the southwest Placer region and the subsequent indirect and secondary effects on biological resources. In particular, Appendix G, prepared for the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency, provides an important and substantive analysis as to which of the alternatives represents the "least environmentally-damaging practicable alternative" (LEDPA) for purposes of obtaining a wetland fill permit from the U.S. Army Corps of Engineers when the project is eventually constructed.
- L-014-002** | The County supports the conclusions in Appendix G as it relates to growth inducement associated with the development of the Placer Parkway. In particular, Placer County supports the determination that Alternative 5 is the alternative that is the environmentally superior alternative as it relates to a range of environmental effects including growth inducement. This is consistent with the determination that the project could be the LEDPA alternative for route selection and ultimate construction of the parkway facility.
- L-014-003** |
- L-014-004** | The County believes that a level of growth that could directly result in a loss of important biological resources (i.e., endangered species habitat and state/federally regulated wetland, stream and riparian areas) is a number of years from occurring.

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**L-014-001**

This comment is noted.

**L-014-002**

This comment is noted. Please note that the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD) analysis is based on hypothetical conditions including additional interchanges and elimination of the no-development buffer, neither of which are proposed. This analysis is substantially more conservative than the analysis in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, and generally reaches the same conclusion with respect to growth inducement.

**L-014-003**

This comment is noted. Please see Chapter 2 and Appendix A of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**L-014-004**

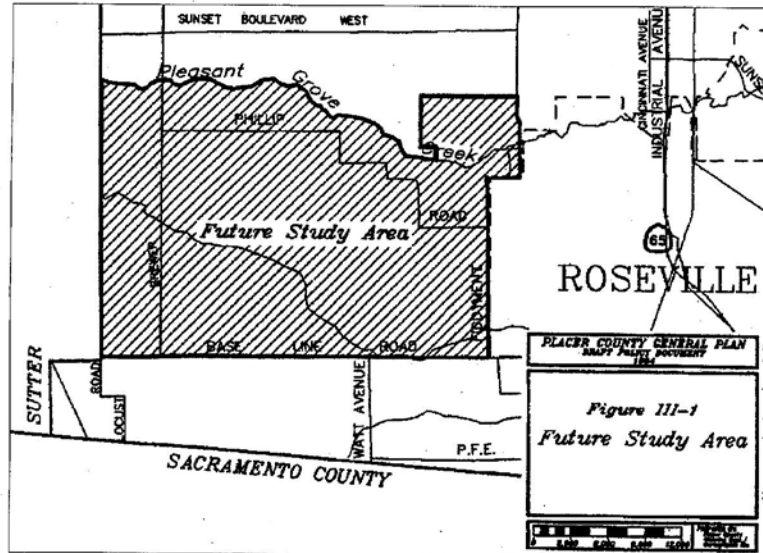
The commenter expresses the view that a level of growth that could directly result in a loss of important biological resources is a number of years from occurring. This comment is noted.

L-014-005

Consequently, any specific prediction as to when and where such growth will occur is just that – a prediction, which in turn is based upon assumptions on conditions and trends. Notwithstanding the speculative nature of such predictions certain conditions are known:

L-014-006

1. The 1994 Placer County General Plan identifies a Future Study Area (see below) for amendments to the General Plan land use diagram that would result in new urban development in the southwest Placer area. The region identified as the Future Study Area includes all the Placer Parkway alternatives. It can generally be described as the area west of the City of Roseville, south of Pleasant Grove Creek, north of Baseline Road and east of Sutter County. With the adoption of the General Plan in 1994, the Board of Supervisors determined that new significant amendments for urban, unincorporated growth in southwestern Placer County in the Future Study Area. This does not preclude general plan amendments in other areas but it does identify this area as the "most appropriate location for such additional [urban or suburban] growth."



2. The timing of potential urban development in the Future Study Area is linked to a requirement that the "West Placer Specific Plan" be approved first. This precondition to any consideration of a general plan amendment in the Future

### L-014-005

The commenter expresses the view that the prediction of the specific location of growth in the study area is speculative. This comment is noted.

### L-014-006

The commenter notes that southwest Placer County, which includes most of the Central Segment of the Parkway study area, is considered within the Placer County General Plan to be the most appropriate location for additional growth (called the "Future Study Area"), and that growth in this area is not more likely to be induced by Alternative 5 than by Alternative 1, and vice versa. This comment is noted.

L-014-006

Study Area has been met as a consequence of the adoption of the Placer Vineyards Specific Plan which is located in the area designated as the West Placer Specific Plan in the 1994 General Plan.

3. Based upon 1 and 2 above, there is no policy limitation or directive that would allocate growth to any particular area within the Future Study Area. Consequently, from a policy perspective, Alternative 5 is as likely to induce growth as Alternative 1. The General Plan treats all areas within the Future Study Area equally. An example of this would be the recent approval of the Regional University project located near the north end of the Future Study Area. This project is expected to grow in an east/west fashion with services extending from existing sources in the to the west. There are no proposals for projects in the southern portion of the Future Study Area.

L-014-007

4. There are presently no sewer, water, major transportation or other general government facilities or services located south of Baseline Road. Such services and facilities, including facilities sized to accommodate new growth, are presently located in the City of Roseville, immediately east of the Future Study Area. The Placer Vineyards project, when it moves forward to implementation, will have urban services located south of Baseline Road; likely extending from east to west. These facilities and services are to be sized for the Placer Vineyards project and not significant new development to the north.

L-014-008

5. Based upon land use projections prepared by SACOG for 2050 and for the Placer County Conservation Plan for 2060, there are ample opportunities for significant new growth throughout the west Placer area including infill within the City of Rocklin, infill and new growth in the City of Roseville and its sphere of influence, infill in the City of Lincoln with annexations into the sphere of influence and potential expansion into its general plan footprint. Given all of this potential for growth and the ability of the Cities and the County to accommodate growth to 2050 and beyond, market forces and the timing of infrastructure delivery will have the greatest potential to determine where and when new growth occurs. The selection of one Placer Parkway alternative versus another is unlikely to be a major influencing factor on the amount and location of new growth in southwestern Placer County.

L-014-009

6. Given the projections for growth (which have been made independently of the Placer Parkway facility), growth is anticipated in this area. The California Department of Finance, SACOG, Placer County, and the Center for Continuing Study of the California Economy all have projections that show that Placer County will be an area of new urban/suburban growth. Recently, SACOG allocated significant levels of growth to this area through the Regional Housing Needs Allocation (RHNA). This effort identifies the housing need for the 6-County SACOG region every 5 years and the Placer County Housing Element must demonstrate how this growth can be accommodated through our land use diagram. Not growing and not accommodating a fair share of the regional

**L-014-007**

The commenter notes that infrastructure in the study area sized to accommodate new growth is located in the City of Roseville. New facilities and services for the Placer Vineyards Specific Plan would likely extend from east to west, and would be sized for that project and not for significant new development to the north. These comments support the growth inducement conclusion in the Draft Tier 1 EIS/EIR and the PRD that growth is likely to occur from east to west, and that there is little difference in the growth inducement potential among alternatives.

**L-014-008**

The commenter's opinion regarding future growth in southwest Placer County supporting the findings of the PRD, and stating that growth in the study area is likely to be driven by market forces and infrastructure provisions rather than the selection of any one Parkway build alternative, is noted.

**L-014-009**

The commenter supports the findings of the PRD that the Parkway is not the instigator of growth in Placer County. The commenter notes that projections for growth in the study area from SACOG, California Department of Finance, and others, all indicate that Placer County will be an area of new growth, and that such growth is supported by, and also necessary in, Placer County. This view also mirrors the growth inducement analysis in the Draft Tier 1 EIS/EIR. These comments are noted.

L-014-009

allocation is not an option available to the County. Furthermore, because of our affordable housing obligations resulting from our RHNA allocation, which can only be provided with urban services, the County must consider urbanization of portions of the County to meet state mandates. The Placer Parkway facility is not the instigator of that growth, that is the function of population demographics, the marketplace, state housing mandates, availability of infrastructure, availability of jobs, "quality of life decisions" and a number of other factors; many of which cannot be directly measured.

L-014-010

7. Growth will occur as predicted with or without the Placer Parkway and no single alternative would appreciably change the amount, location and timing of that growth. In the County's opinion, the Placer Parkway is a critical element of our regional transportation network and is needed to insure that the anticipated growth has the necessary and appropriate transportation infrastructure available in a timely fashion. Without the Placer Parkway, transportation will continue to be accommodated but in more a typical arterial and collector network which is less efficient for much of the local and regional need to move goods, employees, and regional/local traffic in a manner that is consistent with the agreed upon purpose and need for this project.

L-014-011

L-014-012

In conclusion, the County believes that growth is most likely to occur from east to west, the traditional pattern of growth in this area over the past 20 years. As such, any growth inducement that could result from the Placer Parkway alternatives would impact the area in an equal manner. The County is not concluding that the Placer Parkway will not have any growth inducing characteristics; the County just does not believe that the differences between the alternatives are significant enough to conclude that this issue alone would cause Alternative 5 to not be the environmentally superior alternative as noted in Appendix G.

L-014-013

Furthermore, we believe that new urban growth is less likely from south to north. While growth may be induced from south to north due to the recently approved Placer Vineyard Specific Plan, it is less likely due to a general lack of urban services in this area. There are simply no services to extend from at this time and it will be years before such services are available. It would be speculative at this time to conclude that any services located in Placer Vineyards would be sized to accommodate growth to the north.

L-014-014

**Floodplain Protection and Conservation.**

The Engineering and Surveying Department (ESD) has the following additional comments regarding the subject project as it relates to development in the floodplain

The document states in Appendix G, Section 4.1, that "...either directly associated with the construction of the Parkway or as a result of growth induced by the Parkway, could adversely affect floodplains and hydrology." It further states that "Declining levels of developable land could place additional pressure for continued floodplain encroachment..."

**L-014-010**

The commenter states that growth in the study area is likely irrespective of the Parkway project, and will not be affected by the selection of any one Parkway alternative. This comment is similar to the results of the analysis in the PRD as well as the Draft Tier 1 EIS/EIR. No response is required.

**L-014-011**

The commenter expresses support for the project as a critical element of the County's future transportation network. This view reiterates the need for the project identified in Chapter 1 of the Draft Tier 1 EIS/EIR.

**L-014-012**

Please see responses to Comments L-014-006 through L-014-011.

**L-014-013**

The commenter reiterates that growth in the study area is unlikely to occur from south to north. Please also see responses to Comments L-014-006 and L-014-007.

**L-014-014**

The commenter asks that the goals and policies of Placer County should be taken into consideration in the planning and evaluation of the Parkway and quotes from the goals and policies of the Flood Protection section of the Placer County General Plan and Resolution No. 95-3 of the Placer County Flood Control and Water Conservation District. These references support the conclusions in the PRD, which do not consider development in the floodplain as a viable premise.

L-014-014

The proposed project should take into consideration the goals and policies of Placer County in the planning and evaluation of the proposed Placer Parkway. The Placer County General Plan contains the following goals and policies regarding Flood Protection:

**Goal 4.F:** To protect the lives and property of the citizens of Placer County from hazards associated with development in floodplains and manage floodplains for their natural resource values.

Pursuant to this goal, it is Placer County's policy to implement and enforce the Grading Ordinance (Article 15.48) and the Flood Damage Prevention Regulations (Article 15.52).

In addition to Placer County policy, Placer County in general supports the Board of Directors of the Placer County Flood Control and Water Conservation District adopted of Resolution No. 95-3, August 14, 1995, which states:

It is hereby recommended that in general no new land development entitlements be allowed to build or fill within the future, unmitigated 100 year floodplain of major stream of Placer County.

Exceptions to the policy would be permitted under reasonable circumstances such as: Greater public benefits are obtained. (An example of this would be development of a park area or public road. Development of the floodplain for typical residential/commercial/industrial purposes would not be considered appropriate.)

These policies, ordinances and programs have been affirmed and enforced repeatedly since they were originally developed in 1994 and 1995 respectively. The most recent example of this is the Board of Supervisor's consideration of a general plan amendment on floodplain-related policy in the Dry Creek West Placer Community Plan on March 10, 2009. At this hearing the Board denied a policy amendment to allow the development of suburban-sized lots within a portion of the floodplain that would be filled to raise the lots out of the 100-year flood elevation. This decision was not the establishment of new policy but an affirmation of policies that the County has adhered to over the past 15 years. To assume that the County would shift from this long-standing policy position would be speculative and not conform with the County's recent (and past) practice to disallow development in the floodplain.

L-014-015

Lastly, the Engineering and Surveying Department and the County's Flood Control District request that all future environmental documents and project-specific hydrologic/hydraulic studies be submitted to us for our review when they become available.

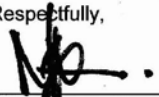
## L-014-015

Copies of future environmental documents and hydrologic/hydraulic studies will be submitted to Placer County's Flood Control District and the Engineering and Surveying Department for review.



Thank you for your consideration of these comments. We look forward to a successful conclusion to this project.

Respectfully,



MICHAEL J. JOHNSON, AICP  
Agency Director

cc: Board of Supervisors  
Tom Miller, CEO  
Holly Heinzen, CEO  
Ken Grehm, Department of Public Works



**Placer County  
Health and Human Services Department**

Richard J. Burton, M.D., M.P.H.  
Health Officer and Director

Jill Pahl, R.E.H.S.  
Director, Environmental Health

February 9, 2009

Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603  
Attn: Celia McAdam

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FEB 10 2009

P.C.T.P.A.

Subject: Placer Parkway Corridor Preservation Project – Partially Revised Draft Tier 1 EIS/EIR

L-015-001

Environmental Health Services, in the capacity of Local Enforcement Agency (LEA) for solid waste issues, has completed a preliminary review of the referenced document and has the following comments relative to the proximity of the proposed parkway to the existing solid waste facilities [Western Regional Sanitary Landfill (a closed landfill and operating landfill) and; Western Placer Materials Recovery Facility (a transfer processing station and compostable materials handling operation)]:

- Landfills, both active and closed, produce methane gas and other gases. Methane gas readily migrates off site through the air or soil. The hazards associated with landfill gas include: asphyxiation, explosion and health impacts of exposure to trace gases. Methane is highly explosive in concentrations of 5-15%, and combustible in concentrations greater than 15%.
- The "Partially Revised Draft Tier 1 EIS/EIR" is relatively general regarding the existing solid waste facilities. A review of the geo-technical data available for the landfill/materials recovery facility should be considered. It should be noted that exceedances of methane regulatory limits have occurred at the landfill boundary (circa 2002 and 2008). Although section 20919.5 of Title 27, California Code of Regulations, requires landfill gas at the landfill boundary not exceed the Lower Explosive Limit (LEL) for methane (5% by volume), it should be understood that amounts of methane less than 5% by volume at the landfill boundary are not addressed by solid waste regulation.
- Activities such as construction, grading, trenching, and utility line installation in the vicinity of a sanitary landfill must address the hazards of landfill gas migration.

L-015-002

L-015-003

It is my understanding that land use staff may address non-solid waste concerns, if any, on behalf of Environmental Health Services under separate cover. Thank you for the opportunity to review and comment on the referenced document. Should you have any questions please contact this office.

Sincerely,  
  
D. Kirschenman, R.E.H.S.  
Hazardous Materials/Solid Waste Section

cc: Jon Whitehill, CWMB  
John Moody, CVRWGCB  
Jill Kearney, Land Development and Water Resources Section  
Virginia Lineberry, Hazardous Materials/Solid Waste Section Supervisor

ref: WRSLEA comments Placer Parkway Corridor Preservation Project, Partially revised Draft, Tier 1 EIS/ EIR 020909

Community Development and Resource Agency Building, 3091 County Center Drive, Suite 160, Auburn, CA 95603  
530.745-2300 • www.placer.ca.gov • fax 530.745-2370

**L-015-001**

Please see response to Comment L-003-001, which discusses how methane gas migration will be addressed.

**L-015-002**

Please see response to Comment L-003-002, which discusses existing solid waste facilities.

**L-015-003**

Please see response to Comment L-003-003, which discusses methane gas migration and construction activities.



# City of Rocklin

3970 Rocklin Road  
Rocklin, California 95677-2720  
O | 916.625.5000  
F | 916.625.5095  
www.rocklin.ca.us

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MAR 09 2009  
P.C.T.P.A.

March 5, 2009

Celia McAdam, Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603  
E-mail: pctpa@pctpa.net

RE: Placer Parkway Partially Revised Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report

Dear Celia:

Thank you for the opportunity to review the above-referenced document. The primary concern for the City of Rocklin regarding this project is in the area of transportation/circulation, specifically how the Placer Parkway might affect City of Rocklin intersections and street segments. The City previously provided comments on the Draft Tier 1 EIS/EIR in a letter dated September 25, 2007. Although the transportation/circulation chapter was not included as a part of the partial revisions, the City would nonetheless like to again express the concerns noted in the above-stated correspondence by way of reference and re-emphasize one of our more significant concerns.

**L-016-001**

The more significant concern that the City wishes to emphasize has to do with the identification of the need for more lanes on Whitney Ranch Parkway than the City currently has identified in its General Plan. Specifically, page 4.3-123 of the Draft Tier 1 EIS/EIR identified a significant LOS impact on the segment of Whitney Ranch Parkway between State Route 65 and University Avenue in the City of Rocklin. The discussion identified several mitigation options, including the need to widen Whitney Ranch Parkway to eight lanes west of University Avenue. As noted in the City's prior comments, land uses in this area have been designated on the Rocklin General Plan as non-residential uses around the existing right-of-way and such land uses do not account for an 8-lane facility. If it is determined that the mitigation measure calling for 8-lanes should be implemented, PCTPA needs to anticipate the acquisition of additional right-of-way and depending on the timing, PCTPA may also need to anticipate the displacement of commercial development.

**Information 916.625.5000**

Administrative Services 916.625.5000 • City Hall 916.625.5560 • Community Development 916.625.5100  
Community Services & Facilities 916.625.5200 • Fire 916.625.5300 • Police 916.625.5400 • Public Works 916.625.5500

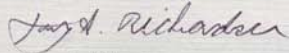
## L-016-001

Section 4.8 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR indicates that Placer Parkway would cause traffic on the segment of Whitney Ranch Parkway from State Route (SR) 65 and University Avenue to increase from about 47,500 daily vehicles to about 60,000 daily vehicles, which would exceed the capacity of a typical six-lane arterial roadway. The Draft Tier 1 EIS/EIR does include the widening of this segment to eight lanes as a potential mitigation measure. The required right-of-way would depend on the future design of the SR 65/Placer Parkway/Whitney Ranch Parkway interchange. The level of service (LOS) in the Draft Tier 1 EIS/EIR was based on a daily segment analysis. During a Tier 2 analysis a more detailed peak-hour intersection analysis would be conducted based on a detailed design of the SR 65/Placer Parkway/Whitney Ranch Parkway interchange. That analysis may determine that mitigation measures other than the widening of this short (about one-quarter mile long) segment of Whitney Ranch Parkway would provide an acceptable LOS. Please also see response to Comment L-011-005.

*RE: Placer Parkway Partially Revised Draft Tier 1 Environmental Impact  
Statement/Program Environmental Impact Report  
March 5, 2009  
Page 2*

If there are any questions, please do not hesitate to contact David Mohlenbrok, Senior Planner, at (916) 625-5160.

Sincerely,



Terry A. Richardson  
Assistant City Manager

Cc: Carlos Urrutia, City Manager  
City Councilmembers  
Larry Wing, City Engineer  
David Mohlenbrok, Senior Planner

P:\PERMANENT PLANNING FILES\corresp\2009\Comments on Placer Pkwy EIR-EIS Partially Revised 3-5-09.doc



City Manager  
311 Vernon Street  
Roseville, California 95678-2649

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MAR 05 2009  
P.C.T.P.A.

March 2, 2009

Ms. Celia McAdam  
Executive Director  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

Dear Celia:

Thank you for the opportunity to review and comment on the Draft Placer Parkway Corridor Preservation Partially Revised Tier 1 EIS/EIR. The City of Roseville appreciates the effort that you, your staff, and consultants have put into this important project. Placer Parkway is proposed as a limited-access roadway in an area that has undergone extensive urbanization, and would relieve existing congestion on Interstate 80, Highway 65, and local roadways within the City of Roseville. It is a vital facility to the economy of this region.

L-017-001

The Revised Tier I document provides important information on the impacts of a reduced buffer and additional interchanges. It is acknowledged that PCTPA does not control the land use or right-of-way at this time, and therefore, a 500-foot to 1,000 foot buffer may be difficult to achieve.

L-017-002

The City concurs with the conclusions of the Revised Tier 1 EIR/EIS. Given the distance from existing utility connections, and restraints on land use with the City's proposed Reason Farms Regional Retention Basin, Alternative 5 would be the least growth inducing. The data further supports this conclusion in that it has the least potential for environmental effects (biology, aesthetics, land use, hydrology) and therefore, should be identified as the Least Environmental Damaging Practicable Alternative (LEDPA).

L-017-003

We look forward to continuing to work with you as this project moves forward. Please feel free to contact Kathy Pease at (916) 774-5434, should you need any additional information.

Sincerely,

W. Craig Robinson  
City Manager

916.774.5362 • Fax 916.774.5485 • TDD 916.774.5220 • www.roseville.ca.us

**L-017-001**

The commenter notes that Placer Parkway is a vital facility to the economy of this region. This view reiterates one of the purposes of the Parkway—providing access to the regional transportation system in areas planned or projected for job growth—identified in Chapter 1 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR.

**L-017-002**

Please see responses to Comments B-002-020 and L-010-001, which describe the width of the no-development buffer zone and the potential for future adjustment of the width of the buffer zone, depending on future land needs.

**L-017-003**

The commenter supports the findings of the Placer Parkway Corridor Preservation Partially Revised Tier 1 EIS/EIR that, based on existing infrastructure and land use restraints, Alternative 5 would be the least growth-inducing alternative, and states that Alternative 5 should be identified as the Least Environmentally Damaging Practicable Alternative. Please see Chapter 2 and Appendix A of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

Municipal Services Agency  
Department of Transportation  
Michael J. Penrose, Director



County of Sacramento

Terry Schutten, County Executive  
Paul J. Hahn, Agency Administrator

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MAR 10 2009

P.C.T.P.A.

March 10, 2009

Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603  
Attention: Ms. Celia McAdam  
Executive Director  
Email: [pctpa@pctpa.org](mailto:pctpa@pctpa.org)

**SUBJECT: COMMENTS ON THE PARTIALLY REVISED DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT (EIS)/PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PLACER PARKWAY CORRIDOR PRESERVATION PROJECT**

Dear Ms. McAdam:

L-018-001

The Sacramento County Department of Transportation has reviewed the partially revised draft TEIR 1 EIS/EIR for the Placer Parkway Corridor Preservation project, dated January 2009. We appreciate the opportunity to review this document. We have previously submitted comments regarding this project and have attached a copy of the letter dated July 12, 2007. We notice that the partially revised document does not address our previously submitted comments. We ask that our comments be addressed in the final TIER 1 EIS/EIR. The Placer County Transportation Planning Agency shall work towards an agreement with the County of Sacramento to fund the proposed project's impacts and mitigation measures on the County roadway facilities.

We look forward to reviewing future studies for this project. Should you have any questions, please feel free to contact me at (916) 875-2844 or [atwalk@saccounty.net](mailto:atwalk@saccounty.net).

Sincerely,

Kamal Atwal, P.E., T.E.  
Associate Transportation Engineer  
Department of Transportation

KA:ka

attachment: Copy of previous comment letter, dated July 12, 2007.

c: Matt Darrow, DOT

*"Leading the Way to Greater Mobility"*



Design & Planning: 906 G Street, Suite 510, Sacramento, CA 95814 . Phone: 916-874-6291 . Fax: 916-874-7831  
Operations & Maintenance: 4100 Traffic Way, Sacramento, CA 95827 . Phone: 916-875-6123 . Fax: 916-875-6363  
[www.sacdot.com](http://www.sacdot.com)

## L-018-001

Please see responses to Comments L-001-001 through L-001-005 for responses to the commenter's letter dated July 12, 2007. The South Placer Regional Transportation Authority (SPRTA) will work with Sacramento County to identify fair-share funding for improvements for the proposed project's impacts and mitigation measures on County roadway facilities, if such impacts and/or mitigation measures are identified during the Tier 2 environmental analysis. The following paragraph is added to the end of Section 4.8.4.3, on page 4.9-126 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR:

### Sacramento County

If improvements are determined to be needed during Tier 2 environmental analysis, SPRTA will work with Sacramento County to identify fair-share funding for improvements for the proposed project's impacts and mitigation measures on Sacramento County roadway facilities.

Ms. McAdam  
March 10, 2009  
Page 2

Dean Blank, DOT  
Steve Hong, County Engineering - IFS

Municipal Services Agency

Department of Transportation  
Tom Zlotkowski, Director



Terry Schutten, County Executive  
Paul J. Hahn, Agency Administrator

County of Sacramento

July 12, 2007

Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603  
Attention: Ms. Celia McAdam  
Executive Director  
Email: pctpa@pctpa.org

SUBJECT: Review Comments on Draft Placer Parkway Corridor Preservation Teir1 EIS/PEIR.

Dear Ms. McAdam:

The Sacramento County Department of Transportation has reviewed the Draft Tier 1 Environmental Impact Statement (EIS)/Program Environmental Impact Report (PEIR) for the Placer Parkway Corridor Preservation dated June 29, 2007. We appreciate the opportunity to review this document and would like to offer the following comments:

1. **Page 4.8-9.** In the *Table 4.8-2*, according to County of Sacramento Traffic Impact Analysis guidelines, maximum daily volume per lane for arterial with low access control for LOS D is 6,750 not 6,870.
2. **Page 4.8-25.** Under section *4.8.3.2 Evaluation Criteria*, please add a bullet item description for Sacramento County.
3. **Page 4.8-38.** In the *Table 4.8-8*, roadway segment 96 and 98, 2005 daily traffic volumes are greater than 2020 estimated daily traffic volumes (EDT) under all alternatives. Please correct and update the corresponding tables.
4. **Page 4.8-31.** In the *Table 4.8-8*, at location 109, 16<sup>th</sup> street should be a 4-lane arterial with moderate access control with 9,000 maximum number of vehicles per lane. Please revise the model run assuming 4-lane 16<sup>th</sup> Street and update the results.
5. **Page 4.8-81.** In the *Table 4.8-25*, at location 109, 16<sup>th</sup> street should be a 4-lane arterial with moderate access control with 9,000 maximum number of vehicles per lane. Please revise the model run assuming 4-lane 16<sup>th</sup> Street and update the results.

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Design & Planning: 906 G Street, Suite 510, Sacramento, CA 95814 . Phone: 916-874-6291 . Fax: 916-874-7831  
Operations & Maintenance: 4100 Traffic Way, Sacramento, CA 95827 . Phone: 916-875-6123 . Fax: 916-875-6363  
www.sacdot.com





Ms. Celia McAdam  
July 12, 2007  
Page 2

We look forward to reviewing future studies for this project. If you have any questions, please feel free to contact me at 875-2844.

Sincerely,

Jaskamal Singh  
Associate Transportation Engineer  
Department of Transportation

cc: Matthew Darrow, DOT  
Dan Shoeman, DOT  
Dean Blank, DOT  
Steve Hong, IFS



SUTTER COUNTY  
COMMUNITY SERVICES DEPARTMENT

Planning – Lisa Wilson, Planning Division Chief  
Animal Control  
Building Inspection  
Environmental Health

Director – Larry Bagley  
Assistant Director – Randy Cagle  
Fire Services – Dan Yager  
Emergency Services – John DeBeaux

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MAR 16 2009

P.C.T.P.A.

March 16, 2009

PCTPA  
Celia McAdam, Executive Director  
299 Nevada Street  
Auburn, CA 95603

Re: **Partially Revised Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report**

Dear Ms. McAdam:

Sutter County has reviewed the Partially Revised Draft Tier 1 Environmental Impact Statement/Program Environmental Impact Report ("Revised Environmental Document") for the Placer Parkway project.

L-019-001

Sutter County would like to reiterate its continued support for either of the northerly corridor alignments (Alternatives 4 and 5) both of which terminate at Sankey Road and State Route 99/70 with an interchange. We have previously noted our support for these corridor alignments August 21, 2007.

L-019-002

A full interchange has been proposed for the current at-grade intersection of Riego Road and SR99/70. This interchange project has been approved by the California Transportation Commission, Caltrans, SACOG and Sutter County and is funded through multiple sources. Construction is slated to begin May 2011. Alternatives 1-3 terminate in an alignment north of Riego Road and will conflict with this programmed project and will conflict with the land-use planning effort that has been completed for the proposed Sutter Pointe Specific Plan. Sutter County previously circulated a draft environmental impact report for this project and the comment period closed on February 6, 2009. Sutter County anticipates holding public hearings on this project this spring.

If you have any questions regarding this matter feel free to contact me at (530) 822-7400.

Sincerely,

  
Doug Libby, AICP  
Principal Planner

DL:gsg

\\s\1\of\PUBLIC\Planning\Projects\200606-002 (Measure M Group)\Correspondence\Placer Hwy partially revised draft tier 1 DEIS-DEIR comments 3-16-09

1130 Civic Center Boulevard • Yuba City, CA 95993 • (530) 822-7400 • FAX: (530) 822-7109

**L-019-001**

The commenter reiterates Sutter County's preference for an alternative terminating at Sankey Road. This comment is noted. Please see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR.

**L-019-002**

Please see response to Comment B-005-002.



PLACER COUNTY WATER AGENCY  
SINCE 1957

BOARD OF DIRECTORS	BUSINESS CENTER
Gray Allen, District 1	144 Ferguson Road
Alex Ferreira, District 2	MAIL
Lowell Jarvis, District 3	P.O. Box 6570
Mike Lee, District 4	Auburn, CA 95604
Ben Navy, District 5	PHONE
	530.823.4850
	800.464.0030
David Breninger, General Manager	WWW.PCWA.NET
Ed Tiedemann, General Counsel	

April 9, 2009  
File No. WA/West Placer

Placer County Transportation Planning Agency  
Attention: Celia McAdam, Executive Director  
299 Nevada Street  
Auburn, CA 95603

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APR 13 2009

P.C.T.P.A.

SUBJECT: Placer Parkway Corridor Preservation Tier 1 EIS / EIR

Dear Ms. McAdam:

Thank you for the opportunity to review and comment on the EIS/EIR prepared for the Placer Parkway Corridor Preservation Project. Placer County Water Agency (PCWA) has reviewed the information and has the following comments.

L-020-001

PCWA would like to take this opportunity to convey the need for temporary construction and permanent utility easements for utility infrastructure within the rights-of-way of Placer Parkway, from the east side of Whitney Ranch Parkway crossing of SR 65, to future developments to the west. The proposed infrastructure is anticipated to be a 48-inch treated water pipeline necessary to serve future developments such as Placer Ranch, Regional University and Placer Vineyards.

L-020-002

The use of reclaimed water for irrigation purposes is an important component of PCWA's Integrated Water Resources Plan. The Agency fully supports and encourages the use of reclaimed water for irrigation purposes for this project.

PCWA appreciates the opportunity to comment. If you have any questions please call me at (530) 823-4886.

Sincerely,

Heather Trejo  
Environmental Specialist

HTMf

pc: Customer Service  
Darin Reintjes  
Leslie Gault  
Mike Nichol

z://f/april09.cor

**L-020-001**

The commenter's request for provision of utility easements within the rights-of-way of Placer Parkway is acknowledged. Coordination regarding the commenter's needs would be appropriate at initiation of the Tier 2 phase of the project.

**L-020-002**

If recycled water lines were available to serve the irrigation needs of the Placer Parkway, this would be considered in the Tier 2 phase of the project.

**PROTECTING EARTH AND ANIMALS  
WITH COMPASSION AND EDUCATION-  
-PEACE-**

P.O. Box 845 Newcastle, CA 95658  
Pea-cc@live.com

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MAR 12 2009

P.C.T.P.A.

3/8/2009

Placer County  
Transportation Planning Agency  
299 Nevada St.  
Auburn, CA 95603

Comments for the Placer Parkway Preservation Revised **Draft EIR**

N-002-001

The shameless smokescreen promoted in section 1.2.4, Access to Placer Parkway is unacceptable. These phrases ("...preserving open space and agricultural uses adjacent to the Parkway; ...preserve biological resources along the corridor; ...limiting future development...") make citizens think positive restrictions are going to be implemented. However, the loophole words that follow, "...not permitted or is severely restricted" provides a bypass to all the pseudo restrictions. To suggest to the public that "unplanned Parkway interchanges" and "limits to growth opportunities" will somehow make this project safe from unplanned growth is a total fabrication.

How can anyone keep a straight face and make these statements when the original Placer Parkway submitted to the public assured **NO INTERCHANGES**? How will "preserving" or "limiting" or "controlling land required for interchanges" or "It is intended..." be enforced, especially with the audacious loophole language, "...it **may be appropriate to adjust the final size and shape of the buffer...**"? Who in their right mind believes this EIR realistically and honestly addresses the truth. In fact, won't this language facilitate future growth, especially with the piecemeal "case-by-case basis" wording? Do the TPA and county officials think we are all coming in on our pumpkin wagons chewing on bedstraw?

N-002-002

Hiding behind land-speculator induced projections that because the area is changing so "dynamically," it must follow that strong development pressure will certainly result in foreseeable development, the project merely becomes a self-fulfilling prophecy. How convenient!

Where are the projections in this EIR to deal with the remote possibility of having Placer County officials follow and comply with the General Plan, and enforce the current zoning? Has Placer Co government been excused from following the laws? How will this project's statistics stack up if officials were committed to NOT continue their reckless, irresponsible, and constant General Plan amending and changing to accommodate land speculators?

N-002-003

Where are the facts that show any of these alternative parkway scenarios will better preserve open space, agricultural uses, and biological resources than locking land into 80-acre minimums, agricultural zoning? Why not work on locking in the zoning in perpetuity first, and THEN talk about Parkway alternatives? Where are the facts that show opposition to development pressure will better preserve open space, agricultural uses, and biological resources when any land is vulnerable to destruction because our county officials cannot amend the General Plan fast enough to accommodate any and all project proposals?

N-002-004

We oppose this Placer Parkway/Corridor proposal because of what it is and for what it is hiding. It is nothing more than a land speculator windfall project, a taxpayer funded highway to open up development for land speculators. It's a boondoggle for land ravagers at the expense of taxpayers. Why isn't the TPA concentrating on public transit? Why isn't taxpayer money to be spent for this atrocious affront to our precious farmlands being spent instead on public transportation, regularly scheduled busses, or

N-002-005

**N-002-001**

Please see Master Response 1, which discusses the no-development buffer zone and proposed interchanges, and response to Comment L-010-001, which discussed the performance standards referenced by the commenter.

The Placer Parkway was never proposed as a no-interchange facility. Please see the *Placer Parkway Interconnect Study Conceptual Plan* (DKS, 2000) and the *Project Study Report for Placer Parkway* (PSR) (DKS, 2001), predecessor studies to the project proposed in the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR (both referenced in the Draft Tier 1 EIS/EIR and available on the Placer County Transportation Planning Agency (PCTPA) website (pctpa.net)). The project's Notice of Intent published in the Federal Register and the Notice of Preparation of a Draft Tier 1 EIS/EIR dated September 18, 2003 described a "controlled-access highway." Numerous public outreach publications, described in Appendix A of the Draft Tier 1 EIS/EIR, identified conceptual interchanges, including notices for public meetings and newsletters showing the conceptual locations of such interchanges.

Please see Section 1.3, Project Purpose, which clearly defines that one of the purposes of the project is providing access to the regional transportation system in areas planned or projected for job growth, including in the Sunset Industrial Area Plan and the area in Sutter County known as "Measure M" which is planned for industrial development, and in which the Sutter Pointe Specific Plan was recently approved by the Sutter County Board of Supervisors. Access is clearly a part of the purpose of the project in these areas.

Please also see the description of the federal resource agency National Environmental Policy Act (NEPA)/404 process in Chapter 2 and Appendix A of this Placer Parkway Corridor Preservation Final Tier 1

**N-002-005** | other forms of public transit that would lessen the load on Hwy 65 and make the Placer Parkway unnecessary? Officials hide behind some obscure notions of earmarked gas taxes, but those can be changed if the reason for the Parkway is to alleviate traffic problems.

**N-002-006** | Are there not plenty of opportunities to alleviate Hwy 65 traffic that will not require such a monstrous project? Have all those opportunities (to reduce traffic on Hwy 65) been explored? Or are county officials in such a big rush to accommodate land speculators with their future sprawl projects (destroying farmlands in the process) that they overlook the reasonable, less expensive solutions to traffic problems?

**N-002-007** | Since carpet baggers are making all the land use decisions in this county, based on what lands they've gobbled up, if we have to have this white elephant of a "corridor" jammed down our throats, then it must be kept closest to where most of the development already is—as SOUTH a route as possible. Why was alternative 1 (the most southerly) moved up (north) in the first place? It was originally closer to Baseline Rd when it was first proposed. Was it inched up just to make it more "undesirable" and thus giving more weight to the other four terrible alternatives? Is this how the game is played—move the one barely acceptable route to a less desirable location in order to make the land speculator preferred route more desirable? Alternative route 1 is the least bitter pill to swallow.

**N-002-008** | We do not need this Parkway at all. Merely extend Watt Avenue; make it a freeway if necessary, and link it to Baseline. If Baseline needs to become a freeway, that would at least preserve the farmlands. Has a Watt/Baseline freeway been analyzed? If so, was this alternative thrown out because it was economically infeasible? Was economically infeasible looked at from the taxpayer's pocketbook or the land speculator's?

Yours truly,  
Board of Directors  
PEACE

EIS/EIR, which describes the additional commitments to minimize the growth-inducing aspects of the project in areas not planned or projected for growth.

**N-002-002**

Section 1.4 of the Draft Tier 1 EIS/EIR describes the land use projections that support the Purpose and Need of the Parkway. The analysis includes input from all local jurisdictions, and is consistent with projections generated by both the Sacramento Area Council of Governments (SACOG) and the California Department of Finance. Please also see response to Comment B-002-008 which defines the range of scenarios analyzed in the Draft Tier 1 EIS/EIR, and Section 3.4.1 for more detail on this topic. The 2020 scenario assumes residential buildout of current general plans within Placer County and development of the initial phase of the Placer Vineyards Specific Plan since urban development in that area was envisioned in the Placer County General Plan; it assumes that growth in retail and total development that balances the assumed residential growth in Placer County, and otherwise assumes a straight-line growth rate based on SACOG estimates and forecasts. The 2020 analysis did not include any of the other proposed Specific Plans currently in process, the rest of the Placer Vineyards Specific Plan, or the recently approved Regional University Specific Plan. Even with that relatively low level of development, analysis shows that the Parkway is needed.

Section 4.1 of the Draft Tier 1 EIS/EIR presents the evaluation of compatibility of the Parkway with the Placer County General Plan and Placer County zoning requirements.

**N-002-003**

Amendments to current Placer County zoning and the Placer County General Plan are not part of the proposed project. As described in Section 2.4 of the Draft Tier 1 EIS/EIR, the conceptual alignment for the

Parkway is included in the 1994 Placer County General Plan.

The purpose of Placer Parkway is not to better preserve open space, agricultural uses, and biological resources than locking land into 80-acre minimums, AG zoning, and the Draft Tier 1 EIS/EIR acknowledges that there will be impacts to these resources. Sections 4.1 of the Draft Tier 1 EIS/EIR present the analysis of potential impacts on land use, including open space. Section 4.4 presents the analysis of potential impacts on farmlands. Section 4.14 presents the evaluation of potential impacts on biological resources.

**N-002-004**

Chapter 1 of the Draft Tier 1 EIS/EIR presents the Purpose and Need for the Parkway, and discusses how the Parkway is intended to serve future population and employment growth in the study area, and serve the economic development goals of both Placer and Sutter counties. The commenter's opposition to the project is acknowledged. Please also see response to Comment N-002-002.

**N-002-005**

Sections 2.5 and 2.6 of the Draft Tier 1 EIS/EIR present alternatives to the Parkway that were considered in the environmental analysis. These include public transit options. The analysis confirmed that, as the project is intended to serve future travel demand and address congestion, an alternative that did not result in the construction of a new facility but instead provided a combination of Transportation Systems Management measures, would not meet the project Purpose and Need.

Please see Master Response 2, which provides information regarding PCTPA transit planning activities.

**N-002-006**

Please see Section 2.5, which describes the alternatives that were considered before identification of the alternatives analyzed in the Draft Tier 1 EIS/EIR.

**N-002-007**

Chapter 2 of the Draft Tier 1 EIS/EIR describes the project alternatives and how they were identified. Section 2.4 of the Draft Tier 1 EIS/EIR lists the agencies, organizations and interested individuals that provided input to the alternatives development process and also presents the chronology for the alternatives identification process. Please also see Appendix B of this Final Tier 1 EIS/EIR, which provides additional information on the Parkway public participation process.

**N-002-008**

An evaluation of the ability of Baseline Road to carry future traffic was analyzed, both with very robust transit assumptions (please see Section 2.6) and with a shorter Parkway carrying traffic from State Route (SR) 65 terminating at approximately Watt Avenue, with and without additional transportation system management functions (please see Sections 2.5.4.2 and 2.5.4.3, respectively). None of these alternatives met the project's Purpose and Need. The analysis in Section 2.6 (the most robust transit scenario) concluded that, "While this analysis indicates that an aggressive land use policy applied on a regional basis could reduce traffic volumes and thereby reduce the impact of future development, the analysis indicates that volumes on arterial roadways that would operate at level of service (LOS) F conditions in 2040 under the No-Build Alternative would not be reduced enough to allow LOS E or better conditions during peak hours of travel."



## MOTHER LODE CHAPTER

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March 16, 2009

Submitted via email to pctpa@pctpa.net and cmcadam@pctpa.net

Celia McAdam  
Placer County Transportation Planning Agency  
299 Nevada Street  
Auburn, CA 95603

**Subject: Comments on the Placer Parkway Corridor Preservation  
Draft Partially Revised Tier 1 EIS/EIR**

Dear Ms. McAdam,

Thank you for the opportunity to comment on the Revised Draft Tier 1 EIS/EIR.

### General comments on selection of preferred alternative most likely to be the LEDPA

**N-003-001** This document continues to mistakenly conclude that Alternative 5 is the preferred alternative, and most likely to be the LEDPA. We agree with the ACOE and EPA that in fact Alternative 1 represents the LEDPA and should be the preferred alternative in the Final EIS/EIR.

**N-003-002** Any indirect growth inducing impacts of Placer Parkway represents a critical concern in western Placer County, since it includes large contiguous expanses of vernal pool grasslands, non-vernal pool grasslands and agricultural lands that are habitat for federal and state listed species and species of special concern. Recovery of federally listed vernal pool species must be accomplished by landscape level conservation through the Placer County Conservation Plan (PCCP), or in its absence adherence to the USFWS *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon*, which calls for 85% avoidance of vernal pool complexes in core areas in west Placer.

**N-003-003** Alternative 5 is the most growth-inducing alternative because its location places it at the northern edge of anticipated future growth in western Placer County. Given that the DEIS/EIR now notes that it is impossible to guarantee there will be no future interchanges (pg. 17), Alternative 5 is in a location that is most likely to be growth inducing in areas not planned proposed to accommodate growth. The portion of western Placer County north of the route is even proposed for inclusion in the conservation reserve area of the Placer County Conservation Plan (PCCP). In contrast, Alternative 1 is less growth inducing because it is in an area of the county that has nearby proposed new growth areas and is mostly in the Future Study Area, a portion of the county that has been identified for potential future growth in Placer County's General Plan. The route would be between two approved major

**N-003-004**

### *Representing 19,000 members in 24 counties in Northern and Central California*

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## **N-003-001**

The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR does not identify a preferred alternative. As required by the California Environmental Quality Act (CEQA), an Environmentally Superior Alternative, Alternative 5, was identified, based on the environmental analysis, and this is described in Section 3.6 of the Placer Parkway Corridor Preservation Partially Revised Draft Tier 1 EIS/EIR (PRD). Please also see Chapter 2 of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR and Appendix A, which document the U.S. Environmental Protection Agency's (U.S. EPA's) concurrence that Alternative 5 with a no-access buffer is the Least Environmentally Damaging Practicable Alternative (LEDPA).

## **N-003-002**

Secondary and indirect impacts on farmland and biological resources are discussed in Sections 4.4.3.4 and 4.14.3.4 of the Draft Tier 1 EIS/EIR, respectively. The commenter is correct in stating that recovery of federally listed vernal pool species would be accomplished through the Placer County Conservation Plan or, in its absence, through adherence to the U.S. Fish and Wildlife Service (USFWS) *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon*. Potential growth inducement associated with the Parkway is discussed in Section 6.1 of the Draft Tier 1 EIS/EIR. The PRD also includes additional analysis of growth inducement and secondary and indirect impacts on biological resources. Please also see response to Comment F-005-003.

## **N-003-003**

The analyses of growth inducement presented in the Draft Tier 1 EIS/EIR and in the PRD do not indicate that Alternative 5 is the most growth-inducing of all build alternatives. Please also see Master Response 1, which discusses the hypothetical analyses presented in Appendix G of the PRD and explains recent revisions to these analyses as shown in Chapter 4 as a result of updates to Geographical



**N-003-005** | development areas, Placer Vineyards Specific Plan to the south and Regional University Specific Plan to the north.

**N-003-006** | Alternative 5 also has the potential to result in greater habitat fragmentation than Alternative 1, in a landscape level context. As DFG and FWS noted (see comment letter re: Draft Tier 1 EIS/EIR, September 4, 2009), and important habitat characteristic in western Placer County is the existence of large blocks of unbroken habitat. Such large blocks of habitat adjacent to the route of Alternative 1, as noted above, is already compromised and fragmented by approved development to the north and south. The route of Alternative 5 exposes the vast area of habitat immediately north of Phillip Rd. to the growth inducing impacts of Placer Parkway. Alternative 1 is the preferred alternative from a habitat perspective.

Specific comments on the Draft Partially Revised Tier 1 EIS/EIR

1.2.1 Project Description, 1.2.4 Access to Placer Parkway, pages 2-5:

**N-003-007** | The project description inappropriately remains unchanged from the original project description in the first Draft EIS/EIR. With the inclusion of Appendix G and the acknowledgement that acquisition and maintenance of a no-development buffer cannot be guaranteed (page 17), there is nothing to preclude future interchanges beyond those in the original analysis. In fact, given the major development projects proposed for the Planning Area, one need not be prescient to anticipate new requests for access to Placer Parkway. The project is no longer “a high-speed facility... [with] five or six interchanges... [that] limit opportunities for growth inducement that might otherwise result from provision of access in areas not planned for growth.” If one considers the initial Tier 1 Draft EIS/EIR combined with this revised document and compares them with Appendix G, the commenter gets a sense that two different projects are being analyzed, one with restricted access and one without. The project does not have a clear and consistent project description, which is required under both CEQA and NEPA. The environmental documents should be withdrawn and redrafted with a clear project description.

1.2.2 Tiering Concept, page 5:

**N-003-008** | As noted in previous comments, we believe that the tiering concept of deferring mitigation and compensation for project impacts to a future environmental document (Tier 2) is inconsistent with the intent of CEQA and NEPA to provide the public and decision makers with the information needed to make a decision whether or not to build Placer Parkway. It is disingenuous to claim that the decision whether to build the project will be made in Tier 2, after the completion of Tier 1 has likely triggered significant expenditures to acquire properties in the chosen corridor. Mitigation measures needed to minimize environmental impacts of the project should be available for consideration in making what will be a de facto decision in Tier 1 whether to build Placer Parkway.

Figure 2, page 7:

**N-003-009** | The ‘City of Roseville Retention Basin,’ which is known as Reason Farms, is inappropriately categorized as ‘Planned/Proposed Development.’ In fact, this area is intended by Roseville to serve as permanent open space to mitigate for impacts of development and provide public open space. By mischaracterizing Reason Farms as a developed area, in the same category anticipated growth areas like Sierra Vista Specific Plan, Figure 2 obscures the fact that Alternative 5 is on the southern edge of a large unbroken expanse of habitat, the presence of which has been identified by FWS and DFG as

Information System data provided by Placer County. These analyses indicate there is very little difference among build alternatives with respect to potential growth inducement. Please also see responses to Comments F-004-007 and F-004-019 regarding the assertion that growth pressure in the study area increases the farther north the Parkway is located.

**N-003-004**

Please see Master Response 1, which discusses the Parkway interchanges and potential growth. Please also see response to Comment F-004-002, which refers the commenter to the various locations of growth inducement analyses in the Draft Tier 1 EIS/EIR, which do not support commenter’s conclusion that Alternative 5 is the most growth-inducing alternative. Finally, please see Chapter 2 and Appendix A of this Final Tier 1 EIS/EIR and Master Response 1, which discusses potential measures that could be implemented to prevent the construction of future interchanges and reduce the potential for growth inducement, and identifies provisions for specific and multiple layers of protection of the no-development buffer in the area of special concern to the U.S. Army Corps of Engineers and U.S. EPA.

**N-003-005**

The commenter’s conclusion that Alternative 1 would be less growth inducing is not supported by the analysis presented in the Draft Tier 1 EIS/EIR or the PRD, or any other objective evidence in the record. The quantitative analysis of induced growth provided in the MEPLAN analysis (DKS, 2007) does not support the commenter’s conclusion. Please also see responses to Comments L-014-005 and L-014-006, which discuss Placer County’s General Plan and notes that southwest Placer County, which includes most of the Central Segment of the Parkway study area, is considered within the Placer County General Plan to be the most appropriate location for additional growth.

- N-003-009** | apparently the most important consideration in assessing the habitat impacts of Placer Parkway alternatives.
- Revised Table ES-1, pages 12, 13:
- N-003-010** | Biological impacts should indicate both direct and indirect impacts to large blocks of existing habitat. Growth inducing impacts continue to be inaccurate in that they fail to distinguish by alternative potential impacts to areas not planned or proposed for development, such as the growth inducing impacts of Alternative 5 relative to Alternative 1 in this regard.
- 3.5 Revised Section 4.9.3.7 – Greenhouse Gas Emissions, page 27:
- N-003-011** | The climate change impacts of projects are subject to CEQA, which requires that impacts be mitigated to the extent feasible. Since CARB estimates that 35% of California’s greenhouse gas emissions are attributable to transportation, regardless of whether CARB has yet issued regulations pursuant to implementing AB 32 and SB 375, this EIS/EIR is still obligated to provide mitigations for reducing climate change impacts. As noted in previous comments, we believe the lead agency must provide a project alternative that meets the goals of Placer Parkway through a robust public transit alternative, which could include: 1) the extension light rail to SR 65, 2) Bus Rapid Transit on SR 65, on the planned Watt Avenue extension and other major thoroughfares, and 3) dedicated truck lanes on Interstate 80.
- N-003-012** |
- The Proposed Project and Regional Planning, page 29:
- N-003-013** | The conclusion that the project is consistent with furthering the SACOG Blueprint is somewhat pointless since Placer County has not shown an interest in land use planning that is consistent with the Blueprint. Under the Blueprint Scenario, Placer Vineyards was expected to have 21,000 dwelling units, but was approved with only 14,000 dwelling units. That deficit of 7,000 dwelling units will theoretically add to the growth inducing impacts of the preferred Alternative 5, which would enhance access to areas to the north of the route which have not been anticipated to absorb growth. If responsible regional planning is to be considered in selecting the preferred alternative, Alternative 1 is the most consistent with the Blueprint.
- 3.6 Revised Chapter 5 – CEQA Evaluation, page 29:
- N-003-014** | Revisions provide only updated comparisons of direct impacts to farmland, vernal pools & wetlands and farmland and arrive at erroneous conclusions as to which alternative would have the least impact on each. Again, for the reasons noted above, the inability to guarantee limits on interchanges necessitates a different analysis based on the location of the alternative routes relative to farming areas and habitat that were not expected to be impacted by growth, but could be through the indirect impacts of Placer Parkway. In this context, Alternative 5 would have the most impacts on these resources, rather than the least.
- Specific Comments on Appendix G
- 2.2.1 Qualitative Conclusions of the Draft Tier 1 EIS/EIR, page G-9:
- N-003-015** | The document states:  
 "It is unlikely that the choice of one Placer Parkway build alternative over another would substantially change expected patterns of growth and development in the project study area and the surrounding region."

### N-003-006

Please see responses to Comments F-004-006 and F-004-009, which discuss potential habitat fragmentation associated with the Parkway. Please also see responses to Comments F-004-007 and F-004-019 regarding the assertion that growth pressure in the study area increases the farther north the Parkway is located.

With respect to the area of land north of Philip Road, the planned City of Roseville Retention Basin lies north of Alternative 5 for the majority of its length in Placer County, which would preclude growth-inducing impacts of the proposed project in this location. To further reduce the potential for growth-inducing impacts, and a part of the LEDPA concurrence process described in Chapter 2 and Appendix A of this Final Tier 1 EIS/EIR, the transportation agencies have agreed to multiple easements to prevent access to this part of the Parkway.

### N-003-007

The project description is presented in Section 1.2, Subsections 1.2.1 through 1.2.4 of the PRD, and remains unchanged from that in the Draft Tier 1 EIS/EIR. In multiple locations within the Appendix G of the PRD, it is stated that the information in Appendix G does not reflect changes in the project as proposed. It evaluates a hypothetical scenario not proposed by the transportation agencies, and presents the analysis of these hypothetical project components. Furthermore, Section 2.2.4.2 of the Draft Tier 1 EIS/EIR and Appendix A of this Final Tier 1 EIS/EIR identify multiple mechanisms for protection of the no-development buffer. There is no need to revise the project description, as it has not changed.

Please see Chapter 2 and Appendix A of this Final Tier 1 EIS/EIR, which summarize the final resolution of the identification of the corridor most likely to contain the LEDPA, including specific provisions regarding the easement language focused on reducing the potential for growth

**N-003-015** The first justification that is offered is that all alignments would provide access to areas already proposed for development. However, Alternative 5 is unique in that it would provide access to habitat and farmland north of Phillip Rd that is not part of any planned or proposed development area, is not within Placer County's Future Study Area, and is not within the SACOG Blueprint Preferred Scenario.

**N-003-016** The second justification given is that among the alternatives, no new interchanges are planned in areas not proposed for growth (the Central Segment). However, this assertion is inconsistent with the central assumption of the Appendix G analysis, that is that limitations on interchanges and the creation of a no-development buffer can not be guaranteed. Indeed, an interchange near Brewer Rd. and Phillip Rd. is one of the interchanges that is modeled in the analysis. If such an interchange was built, Alternative 5 would have potential growth inducing impacts in areas north of Phillip Rd that are not slated for urban development, and beyond the 1 mile distance that the analysis is limited to.

#### 2.3 Additional GIS-Based Alternatives Analysis, page G-11:

**N-003-017** The focus of this analysis, based on growth inducement only within 1 mile of alignments and anticipated and potential interchanges, is of limited value. In fact, nearby freeway access can stimulate growth well beyond 1 mile and the fact is well-known to urban planners. Such an analysis tends to have a 'flattening' effect on differences between alignments. It makes an analysis of potential growth induced by Alternative 5 appear similar to other alternatives, when in fact an expanded geographic approach would reach a very different conclusion. Both north and south of alignments 1 and 2, new growth could only be induced for a limited distance because growth induced by these alignments would soon contact the approved Regional University to the north, and Placer Vineyards to the south. Only alignments 4 and 5, which are north of Regional University, are open-ended in terms of potential growth inducement. To this commenter, it is obvious that Alternatives 4 and 5 have greater indirect growth inducing impacts than Alternatives 1 and 2. The Final EIS/EIR should reflect this.

**N-003-018**

#### 4.2 Additional GIS-Based. Landscape-Focused Secondary and Indirect Impact Analysis

Page G-67 states:

**N-003-019** "The analysis used the results of the quantification of Potentially Developable Land (Section 2.3, Additional GIS-Based Alternatives Analysis) to evaluate the following effects:

- impacts on biological resources in Potentially Developable Land (Figure G-25), and
- fragmentation of biological resources, including contiguous blocks of habitat, resulting in reduced resource connectivity (Figure G-26).

This [biological] analysis focuses on the broadest of the *new analysis areas* — all land within 1 mile of the entire length of each corridor alignment alternative. The secondary and indirect effects of conceptual, potential, and hypothetical interchanges are not discussed separately in this document because the Potentially Developable Land within interchange locations is encompassed by the 1-mile radius boundary along all corridor alignment alternatives, and therefore secondary impacts on biological resources associated with interchanges are included in the overall alignment evaluation."

Given the concerns expressed by DFG and FWS, it is evident that limiting the analysis to within 1 mile of corridors is a flawed approach.

**N-003-020** "Currently, all alternatives occur within a large block of nonfragmented vernal pool grassland habitat...It is essential that large, contiguous areas of uninterrupted vernal pool habitat, including both wetted and upland components, be preserved ...indirect impacts as a result of this project will be significant...We believe that each

inducement. Please also see Master Response 1, which discusses the hypothetical analyses presented in Appendix G of the PRD.

#### **N-003-008**

Section 1.1 of the Draft Tier 1 EIS/EIR explains the rationale behind the decision to prepare a tiered environmental review of the Parkway project. The Draft Tier 1 EIS/EIR does include analysis of the Tier 2 level impacts of the project which would be associated with construction and operation of the roadway within the selected corridor, to the extent that information is available at this Tier 1 stage. The results of this analysis are included in the Draft Tier 1 EIS/EIR, which also includes mitigation commitments and considerations for each environmental resource area (please see Sections 4.1.4 through 4.16.4), at a level appropriate for a Tier 1 level of analysis. Please also see Appendix A of this Final Tier 1 EIS/EIR, which describes the Mitigation Framework identified as part of the modified NEPA/404 process for the Placer Parkway project. Please also see responses to Comments N-001-002 and F-003-006.

#### **N-003-009**

Figure 2 in the PRD shows the City of Roseville Retention Basin as appropriately categorized as planned/proposed development only for the purposes of illustrating that this area would not be subject to potential growth inducement effects from any of the Parkway build alternatives because the area is already designated for public use. The Draft Tier 1 EIS/EIR does not consider the Retention Basin as developed for the purposes of addressing biological resources; it identifies and describes habitat and special-status species in a manner similar to other undeveloped land.

#### **N-003-010**

Potential impacts to substantial contiguous areas of habitat resulting

**N-003-020** alternative will impact both levels of growth and the ultimate location of that growth...although northerly alternatives may impact less acreage and less wetlands, directly, they alternately provide the greatest degree of habitat fragmentation...Agency analysis, based upon the ability of each alternative to preserve large blocks of unbroken habitat, suggests that habitat fragmentation would be increasingly severe as alternatives move north." (DEIS/EIR comments, Sept. 4, 2007)

The wildlife agencies are concerned about habitat fragmentation in the larger context of Placer County, and the EIS/EIR must provide analysis in that context. Alignments need to be compared in terms of how large an unfragmented landscape they would allow to remain. Alternative 1, as the alternative nearest to urban areas, would appear to leave intact the largest unbroken habitat in western Placer County, while the preferred Alternative 5 would reduce the size of the largest unbroken habitat in the county, north of the Regional University Specific Plan.

Conclusion:

**N-003-021** Appendix G, with additional analysis of growth inducing impacts and habitat fragmentation, is a welcome addition to the environmental review of this project, but it is also seriously flawed. The document still fails to fully explore the potential growth inducement impacts beyond land immediately adjacent to the corridors, and fails to analyze habitat fragmentation in a larger regional context, as requested by the wildlife agencies.

**N-003-022** In our view the selection of Alternative 5 as the preferred alternative has been driven largely by the desire to secure a share of funding of Placer Parkway from Sutter County, which demands a Sankey Rd. connection to Placer Parkway. I cannot be ignored that Alternative 5 is the least growth inducing alignment and would result in less fragmentation of large blocks of contiguous habitat.

**N-003-023** Further, the environmental review is confusing due to inconsistent descriptions of the project. Portions of the analysis are based on the presence of no-development buffers and limited access, while other portions of the analysis assume the potential for additional interchanges. This is a flawed document and needs to be redrafted and recirculated.

Sincerely,



Terry Davis  
Conservation Program Coordinator

cc:

David Smith, EPA  
Michael Jewell, ACOE  
Ken Sanchez, USFWS  
Kent Smith, DFG  
Brandon Ira, Senator Boxer  
Kim Delfino, Defenders of Wildlife  
Carol Witham, California Native Plant Society  
Ed Pandolfino, Sierra Foothills Audubon Society

from growth-inducing impacts are discussed in Section 4.3 of the PRD, in which Appendix G analyzes a hypothetical scenario whereby growth would be unconstrained by a buffer or limitation of interchanges. The PRD, as revised as described in Chapter 4 of this Final Tier 1 EIS/EIR, identifies that there would be almost no difference in the growth-inducing impacts of Alternative 1 as compared to Alternative 5, which is similar to the conclusions reached in the Draft Tier 1 EIS/EIR.

**N-003-011**

As stated in Section 4.9.3.7 of the Draft Tier 1 EIS/EIR, the environmental analysis analyses address greenhouse gas emissions to the extent feasible at the Tier 1 level (please see page 4.9-28). Section 3.5 of the PRD provides additional discussion of this issue and also confirms that additional analysis will be undertaken at the Tier 2 level (please see page 29), as initially described in the mitigation section of the Draft Tier 1 EIS/EIR (please see page 4.9-39).

**N-003-012**

Please see response to Comment N-002-005, which discusses the evaluation of public transit as part of the Parkway alternatives analysis, and Master Response 2, which provides information regarding Placer County Transportation Planning Agency transit planning activities.

**N-003-013**

Please see response to Comment F-003-002.

**N-003-014**

Section 3.6 of the PRD comprises changes to text that have occurred as a result of data updates to the Draft Tier 1 EIS/EIR. The conclusions

reflect the effect of these changes on the results of the environmental analysis.

Appendix G presents the results of an analysis that assumes additional hypothetical interchanges and that evaluates the potential indirect impacts of growth associated with each of the alternatives. However, this hypothetical scenario is not proposed, and the results are therefore not considered in the determination of the Environmentally Superior Alternative under CEQA. Please see Master Response 1, which discusses the hypothetical analyses presented in Appendix G and explains recent revisions to these analyses as shown in Chapter 4 as a result of updates to Geographical Information System data provided by Placer County. These analyses indicate there is very little difference among build alternatives with respect to potential growth inducement, even under this hypothetical scenario.

Please see Chapter 2 and Appendix A of this Final Tier 1 EIS/EIR, which summarize specific assurances regarding easement language focused on reducing the potential for growth inducement in the areas identified by the commenter.

**N-003-015**

The area north of Alternative 5 immediately north of Philip Road is within the City of Roseville's Retention Basin and would not be affected by potential growth inducement effects of any of the Parkway alternatives. The area between the retention basin and Sunset Boulevard West would not be accessible from the Parkway and as such would be unlikely to be subject to project-induced growth. Part of this area is also an existing conservation area (please see Figure G-1 in the PRD). Farther to the west, as in other areas, the 1,000-foot corridor would also contain the roadway and the no-development buffer zone, as explained further in Master Response 1. As identified in response to Comment N-003-014 above, please see Chapter 2 and Appendix A of this Final Tier 1 EIS/EIR

which summarizes specific provisions regarding easement language focused on reducing the potential for growth inducement in the areas identified by the commenter.

**N-003-016**

Please see Master Response 1, which discusses the no-development buffer and the analysis of additional hypothetical interchanges that are not proposed as part of the project.

**N-003-017**

Please see response to Comment F-004-002, which discusses the rationale for selection of a one-mile analysis area.

**N-003-018**

The Draft Tier 1 EIS/EIR, which identified an extended secondary and indirect study area as shown on Figure 3-1, concluded that there would be very little difference in potential growth inducement among Parkway build alternatives. The additional analysis of hypothetical components in the PRD, not proposed as part of the project, and as revised as described in Chapter 4 and discussed in Master Response 1, also concluded that there would be very little difference in growth inducement among alternatives when looked at within a more focused area.

**N-003-019**

Please see response to Comment F-004-002, which discusses the rationale for selection of a one-mile analysis area.

**N-003-020**

Please see responses to Comments F-003-001, F-003-003, F-003-005, F-003-009, and F-004-009.

**N-003-021**

Please see Master Response 1 with respect to the purpose of Appendix G, and Appendix A of this Final Tier 1 EIS/EIR, which summarizes specific provisions regarding easement language focused on reducing the potential for growth inducement.

**N-003-022**

Wherever the Parkway is located, Sutter County would be required to fund its fair share. It is acknowledged that Sutter County has expressed a preference for an alternative with a Sankey Road connection to State Route 70/99 (please see Comment Letter L-019). The commenter has likely made an error in stating that, “Alternative 5 is the least growth inducing alignment,” given his previous comments. Assuming that he means that Alternative 1 is the least growth inducing alignment, please see response to Comment F-002-002, which identifies that this conclusion is not supported by any of the several analyses completed for the Draft Tier 1 EIS/EIR or for the PRD.

**N-003-023**

Please see the response to Comment N-003-007.



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P.O. Box 7167, AUBURN, CA 95604

March 15, 2009

Email: [cmcadam@pctpa.net](mailto:cmcadam@pctpa.net)

Attn: Celia McAdam, Exec Dir  
PCTPA  
299 Nevada St.  
Auburn, CA 95603

Ladies and Gentlemen:

RE: Draft Placer Parkway Corridor Preservation--Partially Revised Tier 1 Environmental Impact Statement/Program Environmental Impact Report (DEIR)

The Sierra Club Placer Group is submitting the following comments and questions and asks that they be addressed as a part of the Placer Parkway California Environmental Quality Act (CEQA) process.

N-004-001

The stated purpose of the Placer Parkway (PP) is to reduce anticipated congestion on both the local and regional transportation systems and to advance economic development goals in south Sutter and west Placer County. In addition to being concerned with the underlying premise of those two purposes, we believe the PP proposals need a more visionary and realistic approach to solving transportation problems. Continually building more roads is merely a band aid approach and creates even more environmental problems. Please provide information that indicates how the past half century of building more roads to "reduce congestion" has worked to reduce congestion. Please explain how this project will be different from the mounting evidence that indicates building more roads brings more development which brings more traffic congestion, ad infinitum.

N-004-002

Other concerns include: (1) the perceived bias toward Alternative 5, which provides a most obvious greater benefit to land speculators, and will induce even more growth/development under the guise of "advancing economic development," resulting in even more transportation problems; (2) the estimated construction costs of \$670 million dollars (PP Expenditure Plan, Oct, 2007), which have undoubtedly increased exponentially; and (3) the greater need to address, plan, and implement public transportation/transit solutions for future decades.

N-004-003

New Information: Because this supplemental DEIR revision is being circulated due to new information, please explain why increased costs (new information or changed circumstances) were not included in this DEIR. Or, please confirm that the 2007 Expenditure Plan is still accurate and doable.

N-004-004

N-004-005

Access to PE: The stated "parkway" and limited access concepts are/were clearly stated (p. 5). However, the slip-sliding begins with those fatal words "...it may be appropriate to adjust the final size and shape of the buffer..." The only logical interpretation or conclusion of this "adjustment on a case-by-case basis, depending on the

N-004-006

**N-004-001**

As explained in Sections 1.2 and 1.3 of the Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR, the Parkway is proposed in order to serve future projected population and employment growth in south Sutter, southwest Placer and northern Sacramento counties, and to advance economic development goals in this area. This growth and development is projected to occur irrespective of the existence of the Parkway. Section 3.4 of the Draft Tier 1 EIS/EIR presents the growth scenarios upon which the environmental analysis was based. These scenarios are based on Sacramento Area Council of Governments (SACOG) development forecasts and input from local jurisdictions. The environmental analysis also includes an evaluation of future conditions without the project: the No-Build Alternative. Section 4.8 of the Draft Tier 1 EIS/EIR presents the traffic conditions that would occur in the study area in 2020 and 2040 without the project. The analysis confirmed that without the Parkway there would be substantial congestion in 2020 in the study area and vicinity, including the majority of State Route (SR) 65 operating at Level of Service F. This congestion would increase by 2040. Without the Parkway, future Vehicle Hours of Delay (VHD) would increase substantially in the study area, with a corresponding increase in air pollution, as described in Section 4.9.

With respect to the issue of how transportation infrastructure affects land use changes and/or growth, please see Appendix B of the Placer Parkway Corridor Preservation Community Impact Assessment (Mara Feeney & Associates and North Fork Associates, 2007), which is referenced in the Draft Tier 1 EIS/EIR and is available on the Placer County Transportation Planning Agency (PCTPA) website ([pctpa.net](http://pctpa.net)). This appendix presents a review of the literature on this topic.

**N-004-002**

Potential growth inducement associated with the Parkway is discussed in Section 6.1 of the Draft Tier 1 EIS/EIR. As a result of the environmental



N-004-006

land use needs of future approved development” is that it throws out the previously agreed-upon buffer zones, encourages development, and abdicates any agency’s obligation to enforce buffer compliance. Please address why the final buffer must be adjusted. Please explain why, when policy is set and governances mandated, any “adjustments” can be justified, especially if the incorporated entities agree to the limitations, and/or the buffer zones are owned in fee title.

N-004-007

In Appendix G (Additional Analysis...), it is stated that the assumptions regarding interchanges were made based on adopted plans and processes (“Furthermore, the exclusion of interchanges between Pleasant Grove Road and Fiddymont road and the no-development buffer zone were part of the project description...”—page 8). However, it appears a significant change in the language has now been added, which is that SPRTA cannot guarantee either the limitations on interchanges or creation of the no-development zones. It then follows that **IF** there is to be a Placer Parkway (assuming the No-Build alternative is still viable), then the least damaging route should be one closest to already developed areas—more likely Alternative I, but definitely Alternative I if it is moved further south. We are disappointed in the statement that the growth-inducing scenarios presented are considered hypothetical, when realistically, they are practically assured when the interchanges are built and the buffer zones are reduced.

N-004-008

Evolving Existing Conditions: The stated “challenging” context is only challenging if officials perceive it in that vein and continually ignore the symptoms of traffic congestion rather than the cause. The cause of the problem is continual General Plan amendments and zoning changes to accommodate land speculators and development and then lamenting the traffic problems that those very decisions have created. At one level, the problem can be immediately resolved by not allowing General Plan amendments, zoning changes, and other approvals to accommodate development in farmlands. Strong development pressures must be assuaged by herding them to infill and existing urban areas, rather than Placer County’s farmlands. Just because poor decisions have been made (new development projects in and around the study area), does not obligate taxpayers to fund a PP to pick up the anticipated transportation problems and create new ones. But even if it did, please explain how the problems will be solved in the same failure-prone decision-making mindset of more roads.

N-004-010

Recent and anticipated job and population growth are cited as expected. However, those commuting job holders could use public transportation if it were available and thus not create anticipated traffic congestion. European countries present exemplary models of how public transportation eliminates the need for most citizens to own an automobile. Please provide analysis of alternative solutions: widespread public transportation options, Smart Growth, adherence to General Plan and zoning policies. Please explain why expected or anticipated land use entitlement approvals should put the monkey on the back of the taxpayers to build the PP to provide short-term traffic congestion relief, but create more congestion in the long run.

N-004-011

N-004-012

2.4—Farmlands: The reclassification of agricultural resources appears to be splitting hairs. Unless farmlands are cobble, lava cap, solid granite, or composed of other obvious problematic qualities, if it can grow food or fiber, or provide grazing lands, it all has value. To try to promote one PP alternative over another by comparing farmland classifications is disingenuous. A secure food supply along with a strong contribution to local and economic health, as well as Placer County’s commitment to Placer Grown and

analysis presented in the Draft Tier 1 EIS/EIR, Alternative 5 has been identified as the Environmentally Superior Alternative under the California Environmental Quality Act (CEQA), as described in Section 3.6.6 of the Placer Parkway Corridor Preservation Partially Revised Tier 1 EIS/EIR (PRD). Please note that the project’s purpose includes providing access to the regional transportation system in areas planned or projected for job growth along the SR 65 and SR 70/99 corridors.

**N-004-003**

Construction costs in the Placer Parkway Expenditure Plan are stated in 2005 dollars. The costs at actual start of construction could be greater. Please also see response to Comments B-002-021 and I-019-026, which discuss project financing.

**N-004-004**

Please see response to Comments N-002-005 and I-035-001, which discuss the evaluation of public transit as part of the Parkway alternatives analysis, and Master Response 2, which provides information regarding Placer County Transportation Planning Agency transit planning activities.

Additional information on PCTPA’s public transit planning and programming efforts are provided in Master Response 2 and on PCTPA’s web site: [www.pctpa.net](http://www.pctpa.net).

**N-004-005**

Please see response to Comment N-004-003. For clarification, it should be noted that the PRD is not a supplemental DEIS/EIR.

**N-004-006**

Please see Master Response 1, which discusses the no-development buffer zone. Please also see Chapter 2 and Appendix A of this Placer

N-004-012

other agricultural promotion, is a strong indicator of its importance. Please explain how or why such a reclassification carries any weight, or has any merit, with regard to accommodating development with a PP. If it's farmland, it has value. Please explain the nexus between farmland classification and the need to revise the PP DEIR.

N-004-013

Another key issue relates to Williamson Act (WA) lands. Alternative 1 has no impact on WA agricultural resources (Table ES-1-page 9), which are highly valued and encouraged in Placer Co. To not give great importance to WA land impacts is akin to merely playing lip service to the entire WA program. Please address how the PP's alternatives that impact WA properties become de facto erosions of WA principles. Please examine how such erosion of the WA program has a domino detrimental effect on all WA landholders including the WA land-speculator held lands.

N-004-014

Page 17/18: The last/first paragraph on these pages appears to be an oxymoron. With no substantive changes, on the one hand it is stated that the more northerly alignment alternatives would result in less growth-inducement potential. Yet one of the stated purposes of the PP is to "advance economic development goals." If the phrase, "If you build it, they will come" ever had some truth to it, it applies to this PP proposal. Please explain the bias against the more southerly route, Alternative 1, when it is closer to existing urban development and would obviously have less overall growth inducement potential than would a PP in the middle of farmland.

N-004-015

Farmland Conversion: The Mitigation Strategy No. 1 states that full replacement will be provided for the agricultural land lost for the PP. Please explain what "full replacement" means. True and full replacement can only be at a 2:1 ratio; is that being implemented? Will the requirement include identical classification? If "full replacement" is actually only 1:1, then one is being lost. Please address this net loss mitigation, if 1:1 is the replacement ratio.

N-004-016

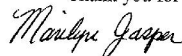
3.6.5—Rev Sec 5.19.3—Segment Building Impacts: Although segmenting the PP is not a clear concept, and confuses issues to some, it appears to set in motion segmenting construction which has the potential for PP to become the road to nowhere. The PP proposal should be considered as a whole, without the segmenting. However, assuming it will be one entire/whole project, using just the Central Segment analysis, then Alternative 1 becomes the preferred choice. Please expand if this is what the Revised Table 5-1 intended to illustrate.

N-004-017

3.6.6—Rev Sec 5.19.4—Conclusion: Again, the conclusion is based on the questionable premise that only the PP will reduce traffic congestion. The No-Build Alternative is looking better every day, especially if public transportation steps into the spotlight. Regardless of the lofty claims and purpose of the PP, the energy and resources would be better spent/used in creating a public transit system that will serve the region well beyond 2040.

N-004-018

Thank you for considering our views,



Marilyn Jasper, Chair  
Sierra Club Placer Group

Parkway Corridor Preservation Final Tier 1 EIS/EIR, which summarize specific provisions regarding easement language focused on reducing the potential for growth inducement.

**N-004-007**

The PRD does not make a significant new change in the project description; it simply acknowledges that it is not possible to protect land in perpetuity, a legal tenet which is ubiquitous. It is precisely for that reason that a number of mechanisms have been identified in the Draft Tier 1 EIS/EIR (please see Section 2.2.4.2). Please also see Chapter 2 and Appendix A, as identified in response to Comment N-004-006 above.

Please see response to Comments F-004-007 and F-004-019, which refute the assertion that growth inducement increases the farther north the Parkway is located.

**N-004-008**

Please see Master Response 1, which discusses the no-development buffer zone. The scenarios for potential growth inducement evaluated in the PRD are hypothetical in that they are based on components that are not part of the proposed project, and would, if proposed by others in the future, be subject to separate and independent environmental review. Please also see Chapter 2 and Appendix A of this Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR, which summarize specific provisions regarding easement language focused on reducing the potential for growth inducement.

**N-004-009**

The comment appears to reflect a misunderstanding of the roles of the Federal Highway Administration (FHWA) and the South Placer Regional Transportation Authority (SPRTA). The comment speaks to the local

land planning process. Please note that neither FHWA nor SPRTA has land use authority.

**N-004-010**

Please see responses to Comments N-002-005 and I-035-001, which discuss the evaluation of public transit used in the Placer Parkway alternatives analysis.

**N-004-011**

Please see response to Comment B-002-021, which identifies that much of Placer Parkway will be paid for through a “Tier II Development Fee” applied to New Growth Areas rather than through taxes.

**N-004-012**

Farmlands is only one of many resource areas that were analyzed in the Draft Tier 1 EIS/EIR. In many areas, the results of the analysis were the same or similar under Alternatives 4 and 5, with impacts being less than alternatives to the south. It is only because they were so similar that a change in the Environmentally Superior Alternative under the California Environmental Quality Act (CEQA) resulted through a revised Farmlands analysis. CEQA specifically points to the Farmland Mapping and Monitoring Program of the California Resources Agency as an appropriate evaluation tool (please see CEQA Appendix G: Environmental Checklist Form, Item II.a under Agriculture Resources), and identifies Prime Farmlands, Unique Farmlands, and Farmlands of Statewide Importance as being important resources. The change in the Farmland mapping resulted in a difference in ranking the alternatives under this parameter and this change was reported in the PRD.

**N-004-013**

As identified in Table ES-1, page 9 of the PRD, Alternative 1 impacts 119.85 acres of Williamson Act land. As disclosed in the document, all

of the Parkway build alternatives impact Williamson Act land. Section 4.4.1.2 of the Draft Tier 1 EIS/EIR describes the concept of the Williamson Act, including that a public agency may not impact Williamson Act land if it is reasonably feasible to avoid it. Section 4.4.3.2 of the Draft Tier 1 EIS/EIR confirms that impacts on Williamson Act land are considered a criterion in the determination of impact significance. Sections 4.4.4.3 and 5.3.1 confirm that the project would have substantial ("significant and unavoidable" under CEQA) impacts on Williamson Act contracted lands, and that there are no feasible avoidance, minimization, mitigation, or design strategies that could be implemented to reduce these impacts. This determination is made in light of all of the evidence in the Draft Tier 1 EIS/EIR, which considers the full range of environmental impacts.

**N-004-014**

Sections 1.2 and 1.3 of the Draft Tier 1 EIS/EIR describe the Purpose and Need of the project, which includes providing access to the regional transportation system in areas planned or projected for job growth along the SR 65 and SR 70/99 corridors.

The Draft Tier 1 EIS/EIR concluded that there would be very little difference in potential growth inducement among Parkway build alternatives. The additional analysis of hypothetical project components not proposed as part of the project presented in the PRD and as revised in Master Response 1 and in Chapter 4 of this Final Tier 1 EIS/EIR, also concluded that there would be very little difference in growth inducement among alternatives. Please see responses to Comments F-004-007 and F-004-019, which discuss the assertion that growth inducement increases the farther north the Parkway is located.

**N-004-015**

As discussed in Section 4.4.4.1 of the Draft Tier 1 EIS/EIR, mitigation considerations at the Tier 2 stage could include proposals for the

preservation of equal acreage of farmland equivalent to the acreage that is impacted by the project. This consideration was developed through consultation with the Placer County Agricultural Commissioner. Details of how this strategy would be implemented, including potential measures that could avoid any net loss of farmland, would be developed during Tier 2, when the precise alignment of the roadway within the selected corridor would be defined.

**N-004-016**

As described in Section 2.1 of the Draft Tier 1 EIS/EIR, the concept of segments is used in the environmental analysis to divide the study area into smaller sections, in order to facilitate easier understanding of impacts associated with an approximately 14- to 16-mile-long facility and to allow for differentiation among alternatives.

The conclusions presented in the Draft Tier 1 EIS/EIR are entirely based on the impact analysis for all segments and the project has not been segmented. As stated in Section 2.2.1 of the Draft Tier 1 EIS/EIR, the future roadway may be constructed in phases but has been analyzed as one facility. If it is constructed in phases, each phase must have independent utility, which would preclude a “road to nowhere” suggested by the commenter.

**N-004-017**

Please see response to Comment N-004-016, which explains that the Parkway is one project and that the environmental analysis is based on the evaluation of all three segments. Revised Table 5-1 shows the results of updates to farmland mapping data, and impacts of the build alternatives on farmland in the Central Segment. The conclusions presented in the Draft Tier 1 EIS/EIR and as updated in the PRD are based on the impact analysis for all segments.

**N-004-018**

Sections 1.2 and 1.3 of the Draft Tier 1 EIS/EIR describe the Purpose and Need of the project, which includes the reduction of anticipated future and regional congestion and the advancement of economic development goals in southwest Placer County and Sutter County. Please see Chapter 4.8, Traffic and Transportation, which provides details explaining that any of the Placer Parkway build alternatives would significantly reduce vehicle hours of delay, as compared to the No-Build Alternative, both under conditions with very little additional approved development, as well as under the more robust 2040 scenario.

Please see response to Comments N-002-005 and I-035-001, which discuss the evaluation of public transit used in the Placer Parkway alternatives analysis.

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

March 16, 2009

Cella McAdam  
Executive director  
Placer County Transportation Planning Agency  
299 Nevada St.  
Auburn, CA 95603

Re: Placer Parkway Corridor Preservation Tier 1 EIS/EIR/SCH # 2003092069

Dear Ms. McAdam:

**S-006-001** As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

**S-006-002** Of concern is the crossing of the Union Pacific Railroad in each of the proposed alternatives as described in the EIS/EIR. Our preference is that a grade separation be considered when the Tier 2 is prepared with the preferred alternative. We will provide additional comments when we review the Tier 2 documents as they pertain to General Order requirements for the construction of the new grade separation.

Thank you for your consideration of these comments. If you have any questions on this matter, please call me at (415) 713-0092 or email at [ms2@cpuc.ca.gov](mailto:ms2@cpuc.ca.gov).

Sincerely,

Moses Stites  
Rail Corridor Safety Specialist  
Consumer Protection and Safety Division  
Rail Transit and Crossings Branch  
515 L Street, Suite 1119  
Sacramento, CA 95814**S-006-001**

Please see response to Comment S-001-001, which discusses Placer Parkway with respect to rail safety.

**S-006-002**

Please see response to Comment S-001-001, which confirms that the current proposal for the Parkway includes a grade separation at the crossing of the Union Pacific Railroad.

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



RECEIVED

MAR 05 2009

P.C.T.P.A.

February 23, 2009

File No.: 220.10284.11784.SCH#2003092069

Ms. Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

Dear Ms. McAdam:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Draft Environmental Impact Report for the Placer Parkway Corridor Preservation Tier 1 Plan SCH#2003092069. We believe the project discussed will impact the mission of the CHP of providing safety and service to the public as they use the highway transportation system within Placer County. The project as outlined will significantly help reduce traffic volume and impact the State highways and roadways within the southern portion of Placer County, primarily Interstate 80 (I-80), State Route 65 (SR-65), Baseline Road, P.F.E. Road, Watt Avenue and Walerga Road.

S-007-001

The effect this project will have on the Auburn CHP Area could be significant in the number of motorists it will attract. The proposed plan encompasses approximately 7 miles of high-speed, limited access roadway between Pleasant Grove Road and Fiddymont Road in the unincorporated area of southern Placer County. The plan calls for the construction of interchanges located at SR-70/99, north of Riego Road or at Sankey Road, or one or two locations to be determined in Southern Sutter County, Fiddymont Road, Foothills Boulevard, and SR-65 at Whitney Ranch Parkway. This project will contribute a significant amount of traffic volume on regional roadways and intersections that could exceed their current capacity.

S-007-002

The Auburn CHP Area office is responsible for more than 800 square miles of area in west Placer County, which includes I-80, S.R. 49, S.R. 193, S.R. 65, and over 1,100 miles of county roadways. We currently have 29 Road Patrol Officers assigned to the Auburn CHP Area office to patrol these roadways 24 hours a day, 365 days a year. We are committed to providing the maximum amount of service and traffic enforcement allowable with our current staffing levels. This project will impact our ability to provide traffic law enforcement services, unless additional staffing is allocated to patrol this project.

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

*Safety, Service, and Security*

### S-007-001

Please see response to Comment S-003-002, which discusses potential impacts of the project on the Auburn California Highway Patrol (CHP) area.

### S-007-002

Please see response to Comment S-003-002, which discusses potential impacts of the project on the Auburn CHP area.



Ms. McAdam  
Page 2  
February 23, 2009

S-007-002

The Auburn CHP Area will need three additional officer positions to adequately patrol the Placer Parkway Corridor Preservation Tier 1 Plan. These new officer positions would be needed to provide traffic enforcement, collision investigations, motor services, and vehicle theft incidents. The Auburn CHP Area is responsible for handling enforcement of traffic laws, collision investigations, traffic control and other related traffic incidents within Placer County.

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

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

Sincerely,



RICK WARD, Captain  
Commander  
Auburn Area

cc: Chief Stan Perez, Valley Division  
Captain Joe Whiteford, Special Projects Section



ARNOLD SCHWARZENEGGER  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT  
DIRECTOR

May 12, 2009

Gary Sweeten/Celia McAdam  
South Placer Regional Transportation Authority  
299 Nevada Street  
Auburn, CA 95603

Subject: Placer Parkway Corridor Preservation Tier 1 EIS/EIR  
SCH#: 2003092069

Dear Gary Sweeten/Celia McAdam:

The State Clearinghouse submitted the above named Joint Document to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 11, 2009, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Terry Roberts  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**S-008-001**

The State Clearinghouse acknowledges that the Placer Parkway project has complied with review requirements under the California Environmental Quality Act. The attached two letters are included as Comment Letters S-009 and T-002, and responses are provided.

S-008-001

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2003092069  
**Project Title** Placer Parkway Corridor Preservation Tier 1 EIS/EIR  
**Lead Agency** South Placer Regional Transportation Authority

**Type** JD Joint Document  
**Description** NOTE: Extended Review

The proposed action would select and preserve a corridor for the future Placer Parkway - a new east-west roadway linking SR 70/99 and SR 65. Potential benefits from future implementation include reducing anticipated congestion on local/regional transportation system and advancing economic development goals in south Sutter and southwestern Placer counties. Potential impacts for future implementation include effects to socioeconomic/community resources, farmlands, cultural resources, traffic/transportation, air quality, noise, hydrology, water quality, and growth.

**Lead Agency Contact**

**Name** Gary Sweeten/Celia McAdam  
**Agency** South Placer Regional Transportation Authority  
**Phone** (916)496-5065/(530) **Fax**  
**email** 823-4030  
**Address**  
**City** 299 Nevada Street  
 Auburn **State** CA **Zip** 95603

**Project Location**

**County** Sacramento, Sutter, Placer  
**City** Roseville  
**Region**  
**Lat / Long**  
**Cross Streets** Multiple  
**Parcel No.** multiple  

<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>

**Proximity to:**

**Highways** SR 70/99, SR 65  
**Airports**  
**Railways** UPRR  
**Waterways** Pleasant Grove, Curry, Steelhead Creeks; Pleasant Grove Creek, Natomas E. Main Canals  
**Schools**  
**Land Use** Placer, Sutter, and Sacramento counties / Cities of Lincoln, Rocklin, and Roseville - urban, rural, and agriculture

**Project Issues** Air Quality; Biological Resources; Cumulative Effects; Growth Inducing; Landuse; Traffic/Circulation; Vegetation; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 5 (Sacramento); Native American Heritage Commission; Public Utilities Commission; State Lands Commission

**Date Received** 01/29/2009 **Start of Review** 01/30/2009 **End of Review** 05/11/2009

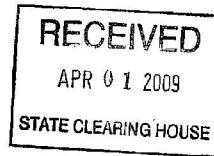
Note: Blanks in data fields result from insufficient information provided by lead agency.



## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3288

March 16, 2009

Cella McAdam  
Executive director  
Placer County Transportation Planning Agency  
299 Nevada St.  
Auburn, CA 95603

Re: Placer Parkway Corridor Preservation Tier 1 EIS/EIR/SCH # 2003092069

Dear Ms. McAdam:

S-009-001

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

Of concern is the crossing of the Union Pacific Railroad in each of the proposed alternatives as described in the EIS/EIR. Our preference is that a grade separation be considered when the Tier 2 is prepared with the preferred alternative. We will provide additional comments when we review the Tier 2 documents as they pertain to General Order requirements for the construction of the new grade separation.

Thank you for your consideration of these comments. If you have any questions on this matter, please call me at (415) 713-0092 or email at [ms2@cpuc.ca.gov](mailto:ms2@cpuc.ca.gov).

Sincerely,

Moses Stites  
Rail Corridor Safety Specialist  
Consumer Protection and Safety Division  
Rail Transit and Crossings Branch  
515 L Street, Suite 1119  
Sacramento, CA 95814

S-009-001

Please see response to Comment S-001-001.

**CENTRAL VALLEY FLOOD PROTECTION BOARD**

3310 El Camino Ave., Rm. LL40  
 SACRAMENTO, CA 95821  
 (916) 574-0609 FAX: (916) 574-0682  
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RECEIVED

SEP 24 2009



September 22, 2009

Celia McAdam  
 South Placer Regional Transportation Authority  
 299 Nevada Street  
 Auburn, CA 95603

P.C.T.P.A.

Dear Ms. McAdam:

State Clearinghouse (SCH) Number: 2003092069  
 Placer Parkway Corridor Preservation Tier 1 EIS/EIR

S-010-001

Staff for the Central Valley Flood Protection Board has reviewed the subject document and provides the following comments:

The proposed project is located within the jurisdiction of the Central Valley Flood Protection Board (Formerly known as The Reclamation Board). The Board is required to enforce standards for the construction, maintenance and protection of adopted flood control plans that will protect public lands from floods. The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River and the San Joaquin River, and designated floodways (Title 23 California Code of Regulations (CCR), Section 2).

A Board permit is required prior to starting the work within the Board's jurisdiction for the following:

- The placement (including auger boring/Jack-and-boring), construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee(CCR Section 6);
- Existing structures that predate permitting or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the encroachment has not been clearly established or ownership and use have been revised (CCR Section 6).
- A vegetation plan including, but not limited to the sites, vegetation type (i.e. common and scientific name), number, planting spacing and irrigation method that will be within each project area (CCR Section 131).

The permit application and Title 23 CCR can be found on the Central Valley Flood Protection Board's website at <http://www.cvfpb.ca.gov/>. Contact your local, federal and state agencies, as other permits may apply.

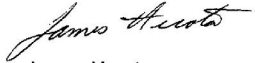
**S-010-001**

The commenter provides information regarding Central Valley Flood Protection Board Permits for the Placer Parkway project. This information will be useful in the Tier 2 environmental process and subsequent permitting. Because the purpose of the Placer Parkway Corridor Preservation Project is to identify and preserve a corridor in which a future Placer Parkway would be constructed, and because no ground-disturbing activity will occur as a result of the Tier 1 process, permits are not needed at this stage.

Celia McAdam  
September 22, 2009  
Page 2 of 2

If you have any questions please contact me at (916) 574-0651 or by email  
jherota@water.ca.gov.

Sincerely,



James Herota  
Staff Environmental Scientist  
Floodway Protection Section

cc:

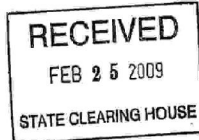
Governor's Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-4082  
(916) 657-6390 - Fax



February 10, 2009



Gary Sweeten  
Federal Highway Administration/South Placer Regional Trans.  
650 Capitol Mall, Suite 400  
Sacramento, CA 95814

RE: SCH#2003092069 Placer Parkway Corridor Preservation Tier 1 EIS/EIR; Placer, Sutter and Sacramento Counties.

Dear Mr. Sweeten:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archeological resources, the NAHC recommends the following actions:

- T-002-001 ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- T-002-002 ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- T-002-003 ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. USGS 7.5 minute quadrangle name, township, range and section required.
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. Native American Contacts List attached.
- T-002-004 ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,  
*Katy Sanchez*  
Katy Sanchez  
Program Analyst

CC: State Clearinghouse

T-002-001

The Placer Parkway Corridor Preservation Draft Tier 1 EIS/EIR identifies that records searches were conducted at the Northeast and North Central information centers in June 2003. Additional sources of information were also consulted, as described on pages 4.7-3 and 4.7-10 of the Draft Tier 1 EIS/EIR. A search of the Sacred Lands File performed by the commenter's staff did not indicate the presence of Native American cultural resources in the study area. Cultural resources within areas previously surveyed were obtained and known cultural resources were identified. No known archaeological resources were identified within the Area of Potential Effects (APE) approved by the California Department of Transportation and the Federal Highways Administration, as the results of the records searches were used, together with information regarding other sensitive resources, to avoid these resources. One National Register-eligible property was identified: Reclamation District No. 1000 Rural Historic District (Figure 4.7-3), and three other properties were identified for which formal evaluation is warranted under the Tier 2 phase of the project (please see page 4.7-11).

Because this phase of the Placer Parkway project is at a Tier 1 level, pedestrian surveys for the entire APE were not conducted. The alignment common to all build alternatives (please see Figure 4.7-2 in the Draft Tier 1 EIS/EIR) was subject to archaeological pedestrian reconnaissance, where access was granted by the landowners, and a predictive model was used to assess the alternatives for potential unknown archaeological sites, as described in the Draft Tier 1 EIS/EIR (please see Section 4.7.2.1 of the Draft Tier 1 EIS/EIR).

Detailed pedestrian surveys and the evaluations of three properties identified above would be undertaken in the Tier 2 phase of the project, along with other avoidance, minimization, and mitigation strategies as described in Section 4.7.4 of the Draft Tier 1 EIS/EIR.



**T-002-002**

The results of an archaeological inventory survey will be presented in a professional report in the Tier 2 phase of the project. Please see response to Comment T-002-001.

**T-002-003**

The Native American Heritage Commission (NAHC) was contacted by URS Corporation on May 27, 2003. A list of local Native American individuals and organizations was sent to URS Corporation on June 6, 2003. On three occasions (June 16, 2003, October 13, 2003, and March 6, 2006), letters requesting information and comment were sent to the Native American individuals identified on the NAHC contact list for Placer, Sacramento, and Sutter counties. In addition to the letters, telephone calls were made in August of 2003 notifying, when possible, these same individuals about the project. Documentation is provided in the Placer Parkway Draft Archaeological Survey Report (URS, 2007), incorporated by reference into the Draft Tier 1 EIS/EIR and available for review on the Placer County Transportation Planning Agency's website (pctpa.net).

**T-002-004**

The commenter notes that lack of surface evidence of archaeological resources does not preclude their subsurface existence. This comment is acknowledged, as identified under Section 4.7.4.3, Tier 2 – Mitigation Commitments, Archaeological Resources, of the Draft Tier 1 EIS/EIR. Detailed mitigation measures reflecting the mitigation identified by the commenter will be included in the Tier 2 environmental document.

**4.0**  
**REVISIONS TO THE DRAFT TIER 1 EIS/EIR**



## 4.0 REVISIONS TO THE DRAFT TIER 1 EIS/EIR

This chapter provides a summary of revisions to the Draft Tier 1 EIS/EIR based on comments received during the public comment period, which are also identified in various responses to comments in Chapter 3. This chapter also includes revisions based on the PRD, to the PRD, and minor other revisions to the Draft Tier 1 EIS/EIR. Additions are shown as underlined and deletions are shown as ~~strike through~~.

### 4.1 DRAFT TIER 1 EIS/EIR

#### EXECUTIVE SUMMARY

Page ES-6, the last sentence is revised as follows:

The selected corridor would contain the roadway, including the median, travel lanes, shoulder, associated access ramps and a no-development buffer zone, subject to performance standards to be developed in Tier 2.

Page ES-10, second to last paragraph is revised as follows:

#### **Farmlands**

The build alternatives would convert between ~~1,578,676.46~~ and ~~1,814,990.06~~ acres of farmland, ~~comprising~~including Prime Farmland, Farmland of Statewide Importance, ~~Local Farmland,~~ and Unique Farmland and Grazing Land. Alternative ~~4~~ 5 would affect the least – approximately ~~1,578,676~~ acres. Alternative ~~3~~ 2 would affect the most – approximately ~~1,814,990.06~~ acres.

Page ES-11, last paragraph, is revised as follows:

Construction emissions would exceed the Placer County Air Pollution Control District (PCAPCD) and Feather River Air Quality Management District (FRAQMD) construction emissions thresholds for reactive organic gases (ROG), oxides of nitrogen (NO<sub>x</sub>), and particulate matter less than or equal to 10 microns (PM<sub>10</sub>). In 2020, all build alternatives would exceed FRAQMD significance thresholds for ROG and during operation; all build alternatives would exceed PCAPCD and FRAQMD significance thresholds for NO<sub>x</sub> during operation. In 2040, all build alternatives would exceed FRAQMD significance thresholds for ROG; all build alternatives would exceed PCAPCD significance thresholds for carbon monoxide (CO); all build alternatives exceed FRAQMD and PCAPCD significance thresholds for NO<sub>x</sub>.

Pages ES-15 through ES-19, Table ES-1, is revised as shown on Revised Table ES-1.

Placer Parkway Corridor Preservation  
Final Tier 1 EIS/EIR

Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Land Use	Land Use Conversion	No impact	1,918.43 acres	1,836.78 acres	1,863.56 acres	1,627.64 acres	<b>1,623.47 acres</b>	Not analyzed**	Qualitative analysis only
	Potentially Bisected Parcels	No impact	<b>26</b>	28 <sup>‡</sup>	<b>26</b>	30	35 <sup>‡</sup>	Not analyzed**	Qualitative analysis only
	Compatibility with Proposed Land Uses	No impact	Depends on future land use approvals	Depends on future land use approvals	Depends on future land use approvals	Depends on future land use approvals	Depends on future land use approvals	Not analyzed**	Qualitative analysis only
	Conflict with General Plan Policies	No impact	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Unavoidable conflict with policies related to preservation of agricultural land	Not analyzed**	Quantitative analysis only
Socioeconomics	Number of Residential Communities Affected	No impact	1 <sup>‡</sup>	<b>0</b>	<b>0</b>	1	1	Not analyzed**	Qualitative analysis only
	Number of Homes, Farmsteads Affected	No impact	4	4	<b>3</b>	7	10	Not analyzed**	Qualitative analysis only
	Number of Employment Centers Affected	No impact	<b>1</b>	1	1	2	2	Not analyzed**	Qualitative analysis only
Farmlands	Prime Farmland	No impact	<u>68.5</u> 195.07acres	<u>68.5</u> 309.60acres	<u>68.62</u> 265.20acres	<u>38.44</u> <b>161.35acres</b>	<u>38.65</u> <sup>†</sup> 168.09 acres	Not analyzed**	Qualitative analysis only
	Unique Farmland	No impact	<u>89.99</u> <b>167.87acres</b>	<u>419.11</u> 191.11acres	<u>421.54</u> 203.26acres	<u>433.98</u> 289.22acres	<u>530.82</u> 388.69acres	Not analyzed**	Qualitative analysis only
	Farmland of Statewide Importance	No impact	<u>435.75</u> 422acres	<u>466.70</u> 464.13acres	<u>464.01</u> 472.77acres	<u>302.23</u> <b>305.90acres</b>	<u>307.48</u> 319.01acres	Not analyzed**	Qualitative analysis only
	Farmland of Local Importance	No impact	<u>756.12 acres</u>	<u>592.79 acres</u>	<u>619.23 acres</u>	<u>569.44 acres</u>	<u>452.9 acres</u>	Not analyzed**	Qualitative analysis only

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

\* For the build alternatives, the greatest potential impact is shown in a shaded cell; the least potential impact is shown in bold. The greatest and least potential impacts are not identified for criteria resulting in identical impacts among all build alternatives.

\*\* A quantitative analysis for this resource was performed for existing conditions only (2004) in order to determine potential environmental impacts under Existing Plus Project conditions.

<sup>†</sup> Shading added

<sup>‡</sup> Shading removed

**Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)**

Potential Impact*		2004						2020	2040
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For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Farmlands (continued)	Grazing Land	No impact	<b>237.42 acres</b>	240.73 acres	240.77 acres	246.1 acres	248.5 acres	Not analyzed**	Qualitative analysis only
	Williamson Act Land Affected	No impact	<b>119.85 acres</b>	243.70 acres	240.56 acres	240.62 acres	240.26 acres	Not analyzed**	Qualitative analysis only
Public Service and Utilities	Municipal Facilities Affected	No impact	108.5 acres City of Roseville Retention Basin	109 acres City of Roseville Retention Basin	100 acres City of Roseville Retention Basin	100 acres City of Roseville Retention Basin	<b>96 acres</b> City of Roseville Retention Basin	Not analyzed**	Potential encroachment into future Western Regional Sanitary Landfill expansion area
Visual and Aesthetics	Potential Level of Impact from Build Alternative	No impact	Moderate/High	Moderate/High	Moderate/High	<b>Moderate</b>	<b>Moderate</b>	Not analyzed**	Qualitative analysis only
Cultural Resources	Archaeological Resources	No impact	No identified impact	No identified impact	No identified impact	No identified impact	No identified impact	Not analyzed**	Qualitative analysis only
	Built Environment Resources	No impact	1 property and 3 potential properties	1 property and 3 potential properties	1 property and 3 potential properties	<b>1 property</b>	<b>1 property</b>	Not analyzed**	Qualitative analysis only
	Paleontological Resources	No impact	High sensitivity	High sensitivity	High sensitivity	High sensitivity	High sensitivity	Not analyzed**	Qualitative analysis only
Traffic and Transportation	Vehicle Miles of Travel (VMT)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	<b>No-Build = 17,723,337</b> Alt 1 = 17,844,410 Alt 2 = 17,872,706 Alt 3 = 17,885,664 Alt 4 = 17,869,007 Alt 5 = 17,871,704‡	<b>No-Build = 25,977,539</b> Alt 1 = 26,419,100 Alt 2 = 26,472,170 Alt 3 = 26,482,608 Alt 4 = 26,476,869 Alt 5 = 26,455,500

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

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† Shading added

‡ Shading removed

**Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)**

Potential Impact*		2004						2020	2040	
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For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.										
Traffic and Transportation (continued)	Level of Service Impacts	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	All Alternatives affect: • Portions of SR 70/99 • Portions of SR 65	All Alternatives affect: • Portions of SR 70/99 • Portions of SR 65 • Portions of Fiddymont Road • Portions of Sierra College Blvd • Portions of Valley View Parkway • Portions of Whitney Ranch Parkway	
	Vehicle Hours of Delay 3-hour a.m. and 3-hour p.m. Commute Periods	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	LOS D: No Build = 35,694 <b>Alternative 1 = 34,206</b> Alternative 2 = 34,272 Alternative 3 = 34,409 Alternative 4 = 34,501 Alternative 5 = 34,382	LOS D: No Build = 100,775 <b>Alternative 1 = 94,619</b> Alternative 2 = 95,077 Alternative 3 = 95,100 Alternative 4 = 95,493 Alternative 5 = 94,929
		Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	LOS E: No Build = 25,077 <b>Alternative 1 = 23,783</b> Alternative 2 = 23,880 Alternative 3 = 23,992 Alternative 4 = 24,077 Alternative 5 = 23,951	LOS E: No Build = 81,200 <b>Alternative 1 = 76,003</b> Alternative 2 = 76,450 Alternative 3 = 76,479 Alternative 4 = 76,885 Alternative 5 = 76,335
		Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	LOS F2 <sup>1</sup> No Build = 16,447 <b>Alternative 1 = 15,448</b> Alternative 2 = 15,530 Alternative 3 = 15,617 Alternative 4 = 15,739 Alternative 5 = 15,588	LOS F2 <sup>1</sup> No Build = 62,327 <b>Alternative 1 = 57,974</b> Alternative 2 = 58,463 Alternative 3 = 58,473 Alternative 4 = 58,885 Alternative 5 = 58,351
Air Quality	Construction Emissions – ROG, NO <sub>x</sub> , PM <sub>1</sub>	No impact	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	Exceeds FRAQMD and PCAPCD significance thresholds	N/A	N/A	

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

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† Shading added

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**Revised Table ES-1  
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(Continued)**

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For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Air Quality (continued)	Operational Emissions-reactive organic gases (ROG)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Alts 1-5 exceed FRAQMD significance thresholds	Alts 1-5 exceed FRAQMD significance thresholds Alts 1-5 <u>No exceedance</u> of PCAPCD significance thresholds
	Operational Emissions – carbon monoxide (CO)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Significance thresholds not exceeded	<u>Alts 1-5 exceed PCAPCD</u> Significance thresholds not exceeded
	Operational Emissions – nitrogen oxide (NO <sub>x</sub> )	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Alts 1, 2, 3, 4, and 5 exceed FRAQMD <u>and</u> PCAPCD significance thresholds	Alts 1-5 exceed FRAQMD significance thresholds Alts <u>1-5</u> , 3, 4, and 5 exceed PCAPCD significance thresholds
	Operational Emissions – respirable particulate matter (PM <sub>10</sub> )	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Significance thresholds not exceeded	Significance thresholds not exceeded
	Operational Emissions – sulfur dioxide (SO <sub>x</sub> )	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Significance thresholds not exceeded	Significance thresholds not exceeded
Noise and Vibration	Noise at Residential Units Exceeding Threshold (66 dBA)	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	<b>Alt 1 = 0</b> Alt 2 = 2 Alt 3 = 2 <b>Alt 4 = 0</b> Alt 5 = 1	<b>Alt 1 = 0</b> Alt 2 = 2 Alt 3 = 2 <b>Alt 4 = 0</b> Alt 5 = 1
	Number of Roadways with projected increases in traffic noise > 12 dBA	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	No-Build = 1 Alt 1 = 1 Alt 2 = 1 Alt 3 = 1 <sup>‡</sup> Alt 5 = 1	No-Build = 15 Alt 1 = 11 Alt 2 = 11 Alt 3 = 11 <sup>‡</sup> <b>Alt 4 = 10<sup>‡</sup></b> <b>Alt 5 = 10<sup>‡</sup></b>

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<sup>†</sup> Shading added

<sup>‡</sup> Shading removed



Placer Parkway Corridor Preservation  
Final Tier 1 EIS/EIR

Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Energy	Estimated Fuel Consumption	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	Similar to but less than 2020	<b>No-Build = 717,544 gallons</b> Alt 1 = 722,445 gallons Alt 2 = 723,591 gallons Alt 3 = 724,115 gallons Alt 4 = 723,441 gallons Alt 5 = 723,550 gallons	<b>No-Build = 1,051,722 gallons</b> Alt 1 = 1,069,599 gallons Alt 2 = 1,071,747 gallons Alt 3 = 1,072,170 gallons Alt 4 = 1,071,938 gallons Alt 5 = 1,071,072 gallons
Hazardous Materials/Waste	Number of RECs potentially located within alignment	No impact	<b>3</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>4</b>	Not analyzed**	Qualitative analysis only
Hydrology and Floodplains	New Impervious Area	No impact	745 acres	737 acres	740 acres	624 acres	<b>622 acres</b>	Not analyzed**	Qualitative analysis only
	Stream/Canal Crossings	No impact	16	12	11	<b>10</b>	<b>10</b>	Not analyzed**	Qualitative analysis only
	Area Affected Within 100-Year Floodplain	No impact	<b>269 acres</b>	302 acres	317 acres	370 acres	372 acres	Not analyzed**	Qualitative analysis only
Geology – Soils, Seismic	Soils or Geology Affected; Seismic or Geologic Factors	No impact	No major potential impacts	No major potential impacts	No major potential impacts	No major potential impacts	No major potential impacts	Not analyzed**	Qualitative analysis only
Water Quality	Watersheds Traversed	No impact	5	5	5	<b>4</b>	<b>4</b>	Not analyzed**	Qualitative analysis only
Biology	Riparian Habitat	No impact	5.9 acres	12.3 acres	<b>4.8 acres</b>	<b>4.8 acres</b>	4.9 acres	Not analyzed**	Qualitative analysis only
	Potential Giant Garter Snake Habitat	No impact	340.8 acres	340.8 acres	340.8 acres	<b>268.2 acres</b>	<b>268.2 acres</b>	Not analyzed**	Qualitative analysis only
	Potential Swainson's Hawk/White-Tailed Kite Nesting Habitat	No impact	6.4 acres	7.9 acres	4.6 acres	<b>3.3 acres</b>	3.6 acres	Not analyzed**	Qualitative analysis only
	Potential Swainson's Hawk Foraging Habitat	No impact	1,024.0 acres	952.3 acres	989.0 acres	863.5 acres	<b>759.4 acres</b>	Not analyzed**	Qualitative analysis only
	Potential Valley Elderberry Longhorn Beetle Habitat	No impact	1.9 acres	1.3 acres	<b>1.2 acres</b>	<b>1.2 acres</b>	<b>1.2 acres</b>	Not analyzed**	Qualitative analysis only

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‡ Shading removed

**Revised Table ES-1  
Summary of Potential Impacts from the Placer Parkway Alternatives  
(Continued)**

Potential Impact*		2004						2020	2040
		No-Build	Alternative 1 (Red)	Alternative 2 (Orange)	Alternative 3 (Blue)	Alternative 4 (Yellow)	Alternative 5 (Green)		
For Tier 1 analysis, direct impacts assume all resources within a corridor would be affected. This is an extremely conservative assumption, which is likely to overstate impacts.									
Biology (continued)	Wetlands	No impact	35.8 acres	30.9 acres	32 acres	28.3 acres	<b>28.0 acres</b>	Not analyzed**	Qualitative analysis only
	Vernal Pool Complexes	No impact	122.7 acres	124.1 acres	127.6 acres	<b>106.7 acres</b>	124.0 acres	Not analyzed**	Qualitative analysis only
Growth Inducement		No impact	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Would help facilitate planned and proposed developments in the region and is expected to influence the timing of development in the vicinity of its proposed interchanges, particularly those proposed near vacant land adjacent to rapidly developing areas or areas now proposed for urban development	Not analyzed**	Qualitative analysis only
Section 4(f) Analysis	4(f) Resources in the study area	No impact	RD 1000	RD 1000	RD 1000	RD 1000	RD 1000	Not analyzed**	Qualitative analysis only

<sup>1</sup> LOS F2 is the added travel time for vehicles faced with 3 hours or more of LOS F conditions during the 3-hour a.m. and p.m. commute periods.

\* For the build alternatives, the greatest potential impact is shown in a shaded cell; the least potential impact is shown in bold. The greatest and least potential impacts are not identified for criteria resulting in identical impacts among all build alternatives.

\*\* A quantitative analysis for this resource was performed for existing conditions only (2004) in order to determine potential environmental impacts under Existing Plus Project conditions.

† Shading added

‡ Shading removed

## CHAPTER 1 INTRODUCTION AND PURPOSE OF AND NEED FOR PROJECT

Page 1-17, the following paragraph is added at the end of page 1-17:

Subsequent to the publication of the Placer Parkway Corridor Preservation Draft EIS/EIR, the Placer County Board of Supervisors approved the PVSP. On July 16, 2007, they approved the “Base Plan” rather than the “Blueprint Alternative.

Page 1-35, Figure 1-15 has been updated as shown on Revised Figure 1-15.

## CHAPTER 2 PROJECT ALTERNATIVES

Page 2-10, the last sentence is revised as follows:

Landscaping will be installed within the Parkway’s “buffer areas,” i.e., the portions of the 500- and 1,000-foot-wide corridors not used as part of the roadway cross section, subject to performance standards to be developed in Tier 2, as well as within the median.

Page 2-41, Section 2.7, the following text is added after the last paragraph:

Upon certification of the environmental document and approval of the project by SPRTA, the following General Plan amendments will be prepared and processed:

### Amendments to Placer County General Plan

- Amend Circulation Plan Diagram for consistency with Placer Parkway’s adopted corridor alignment alternative
- Amend Table 1-7, Functional Classification, to include Placer Parkway

### Amendments to Sunset Industrial Area Plan

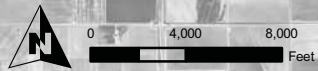
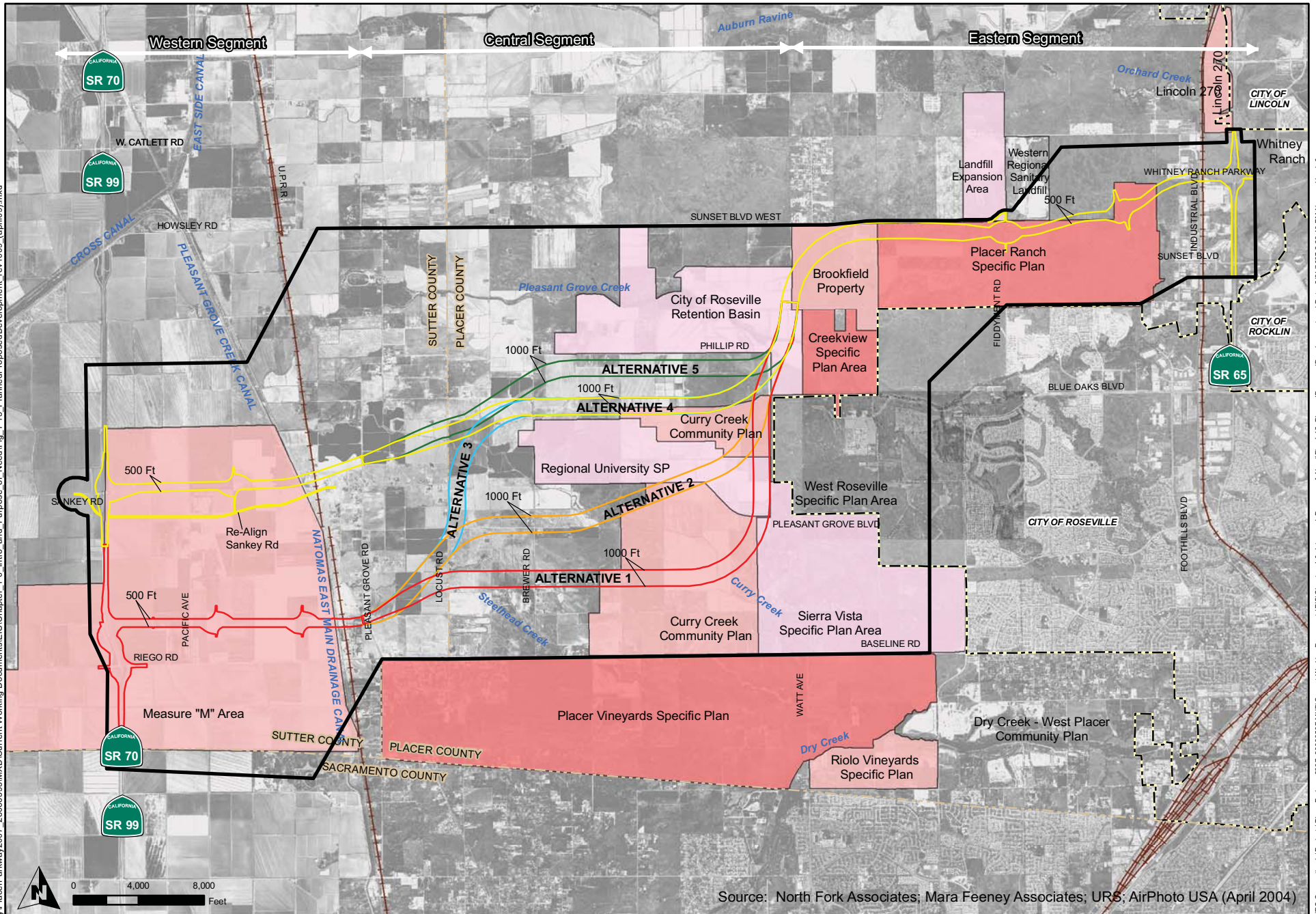
- Amend Circulation Diagram, Figure 2-1, for consistency with Placer Parkway’s adopted corridor alignment alternative
- Amend Capital Improvement Program narrative on pages 2-1 and 2-2 to include Placer Parkway
- Amend narrative for post-2015 improvements on page 2-3 to include Placer Parkway

### Amendments to Sutter County General Plan

- Amend General Plan for consistency with Placer Parkway’s adopted corridor alignment alternative

Page 3-11, Figure 3-1 has been updated as shown on Revised Figure 3-1.

U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066555\MXD\Current Working Documents\EIS\Chapter\_1-0\_Intro\_and\_Purpose\_of\_Need\Fig\_1-15\_PlannedProposedDevelopment\_rev1009.apr1009.mxd



Source: North Fork Associates; Mara Feeny Associates; URS; AirPhoto USA (April 2004)

- Study Area Boundary
- City Boundary
- County Boundary
- Alternative 1
- Alternative 2
- Alternative 3
- Alternative 4
- Alternative 5
- Other Planned/Proposed Development



Tier 1 EIS/EIR

Planned / Proposed Development

**Figure 1-15**  
(revised)

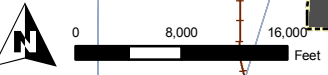
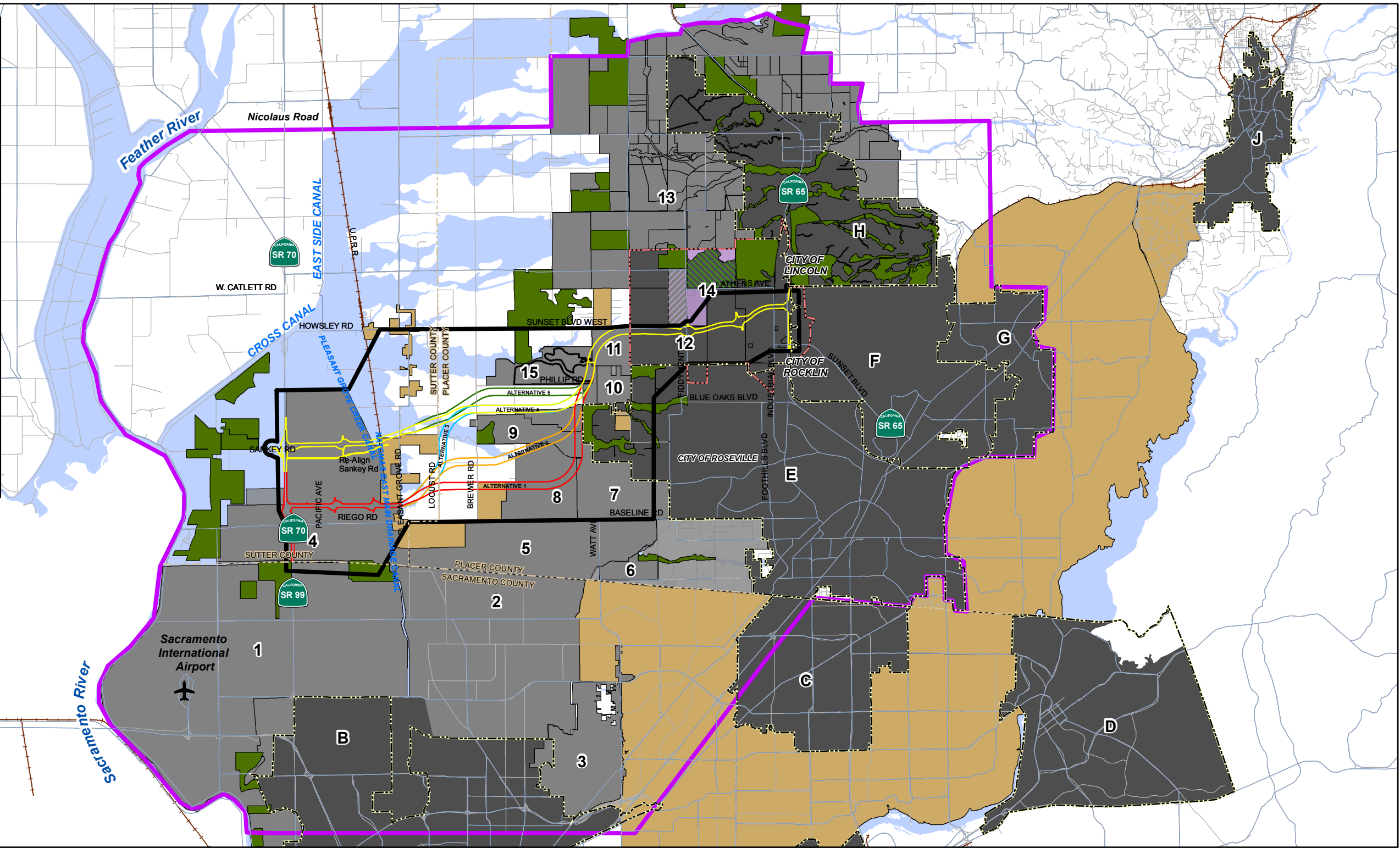
**November 2009**

URIS Corporation, L:\Projects\PlacerParkway\2007\_28066555\MXD\Current Working Documents\EIS\Chapter\_1-0\_Intro\_and\_Purpose\_of\_Need\Fig\_1-15\_PlannedProposedDevelopment.mxd Date: 2/21/2007 5:22:49 PM Name: akkeee0



U:\GIS\Placer\_Parkway\PlacerParkway2007\_2806659\MXD\Current Working Documents\EIS\Chapter\_3-1\_Secondary\_and Indirect\_Impact\_Analysis\_Study\_Area\_new\_revised1009.mxd

- Cities/Towns:**
- A - Woodland
  - B - Sacramento
  - C - Citrus Heights
  - D - Folsom
  - E - Roseville
  - F - Rocklin
  - G - Loomis
  - H - Lincoln
  - I - Wheatland
  - J - Auburn
- Planned/Proposed Development Areas:**
- 1 - Natomas Joint Vision Area
  - 2 - Rio Linda and Elverta Community Plan Area
  - 3 - McClellan Redevelopment Project Area
  - 4 - Measure M / Sutter Pointe
  - 5 - Placer Vineyards Specific Plan Area
  - 6 - Riolo Vineyards Specific Plan Area
  - 7 - Sierra Vista Specific Plan Area
  - 8 - Curry Creek Community Plan Area
  - 9 - Regional University Specific Plan Area
  - 10 - Creekview Specific Plan Area
  - 11 - Brookfield Property
  - 12 - Placer Ranch Specific Plan Area<sup>1</sup>
  - 13 - City of Lincoln SOI Expansion Area
  - 14 - Sunset Industrial Area Plan (SIAP)<sup>2</sup>
  - 15 - Reason Farms
- <sup>1</sup> Includes Placer Ranch Specific Plan area (#12); entire SIAP is shown as approved for development
- <sup>2</sup> Placer Ranch Specific Plan is in SIAP and is therefore shown as approved for development, specific development proposal pending



- |                 |               |                             |  |                                |   |                             |
|-----------------|---------------|-----------------------------|--|--------------------------------|---|-----------------------------|
| City Boundary   | Alternative 1 | Alternative 4               | Existing and Approved Development                                    | Developed Unincorporated Areas | Study Area for Secondary and Indirect Impacts | Proposed Landfill Expansion |
| County Boundary | Alternative 2 | Alternative 5               | Planned / Proposed Development (including future conservation areas) | Municipal Facilities           | Project Study Area Boundary                   | Pending Conservation Area   |
| Railroads       | Alternative 3 | Existing Conservation Areas | 100 Year Floodplain Areas  | Sunset Industrial Area         | Flood Control/Recreation                      |                             |

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville

Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.



TIER 1 EIS/EIR

## Secondary and Indirect Impact Analysis Study Area

Figure 3-1 (revised)

November 2009



## CHAPTER 4 ENVIRONMENTAL ANALYSIS

### Section 4.1 Land Use

Page 4.1-3, revise the text under the City of Roseville General Plan as follows:

Community Form Policy 8. New development proposals to the west of Fiddymont Road within the County/City Memorandum of Understanding Transition Area shall meet the objectives and terms of the Memorandum of Understanding between the City of Roseville and the County of Placer.

Growth Area Policy 5.6. Any development proposal west of Roseville shall aid in regional traffic solutions and in right of way preservation.

Growth Area Policy 5.8. Any development proposal west of Roseville shall consider development potential within the entire City/County Memorandum of Understanding Transition Area in the design and sizing of infrastructure improvement.

Page 4.1-23, the following sentence is inserted before the last sentence of the second full paragraph:

However, this area was identified by the City's Growth Management Visioning Committee as an area that should be studied for the next potential Sphere of Influence expansion area and the City of Roseville identified this project site as a Future Study Area in June 2007.

Page 4.1-24, the first sentence of the second sub-bullet under the second bullet is revised as follows:

The no-development buffer associated with the Parkway (either 500 feet or 1,000 feet, depending on the segment) could substantially reduce the amount of usable land on the bisected parcels, subject to performance standards to be developed in Tier 2.

Page 4.1-25, Figure 4.1-4 has been updated as shown on Revised Figure 4.1-4.

Page 4.1-27, the second sentence of the last paragraph is revised as follows:

The corridor width is proposed to be wider than the ROW required for the actual transportation facility in order to control access to the facility, create a buffer along the Parkway, and reduce the potential for growth inducement, subject to performance standards to be developed in Tier 2.

Page 4.1-29, the first sentence of the first full paragraph is revised as follows:

Subject to performance standards to be developed in Tier 2, ~~The~~ no-development buffer zone would help preserve the rural character of at least a strip of the agriculturally designated areas within all three segments by preventing development from extending to the roadway's edge.



Page 4.1-42, Table 4.1-4, add the following rows above the last row of the table:

Growth Area Policy 5.6	Any development proposal west of Roseville shall aid in regional traffic solutions and in right of way preservation.	No conflict as proposed	The project purpose is to alleviate regional traffic problems and to preserve right of way.	Consistent
Growth Area Policy 5.6	Any development proposal west of Roseville shall consider development potential within the entire City/County Memorandum of Understanding Transition Area in the design and sizing of infrastructure improvement.	No conflict as proposed	The project purpose is to alleviate regional traffic problems and to preserve right of way.	Consistent

Page 4.1-43, the penultimate sentence in the second full paragraph is revised as follows:

Subject to performance standards to be developed in Tier 2, ~~The~~ proposed no-development buffer zones could help preserve some of the agricultural land along the corridor alignments, which would aid in the Conservancy's goal of maintaining agricultural land and sensitive species habitat within the Natomas Basin.

Page 4.1-44, the third sentence of the first paragraph is revised as follows:

Subject to performance standards to be developed in Tier 2, ~~The~~ creation of a no-development buffer zone in the proposed corridor alignment is expected to help maintain the rural character of at least a strip of the agriculturally designated areas within all three segments by preventing development from extending to the roadway's edge.

Page 4.1-44, the second sub-bullet under the third bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone.

Page 4.1-46, the second sub-bullet under the first bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone.

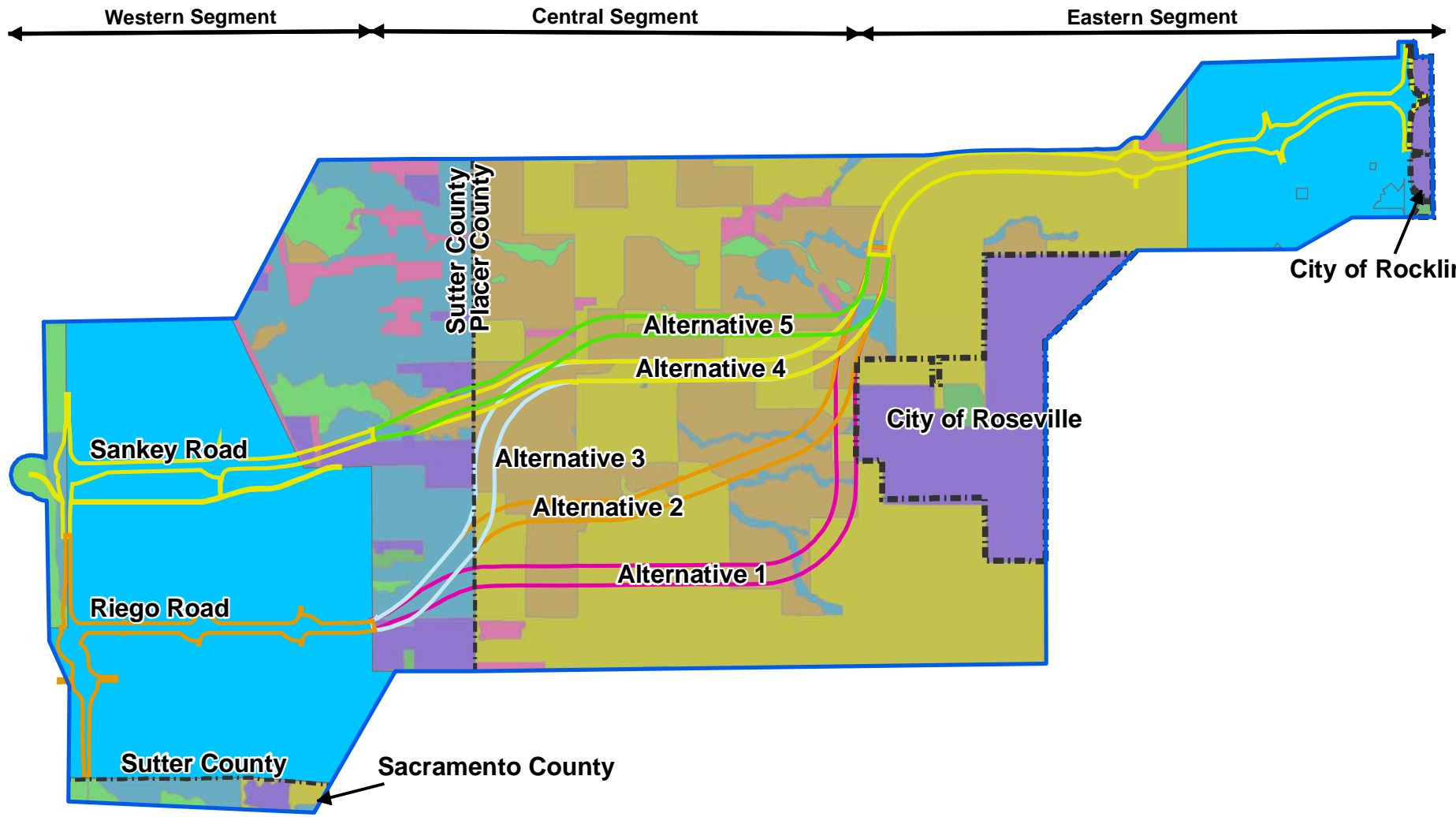
## Section 4.2 Socioeconomics and Community Impacts

Page 4.2-28, the second sub-bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone.

## Section 4.4 Farmlands

Pages 4.4-11 and 4.4-12, Figures 4.4-1 and 4.4-2 are as shown on Revised Figures 4.4-1 and 4.4-2.



Source:  
 1. Placer County GIS data provided by Placer County Planning Department. Received: February 21, 2006.  
 2. Sutter County GIS data provided by Sutter County Planning Department. Received: February 16, 2006.  
 3. Sacramento GIS data provided by URS Corporation - Oakland, CA Received: February 17, 2006.

**Placer County Important Farmland**

- Urban and Built Up Land
- Grazing Land
- Farmland of Local Importance
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Other Land

**Sutter County Important Farmland**

- Urban and Built Up Land
- Grazing Land
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Other Land

**Sacramento County Important Farmland**

- Grazing Land
- Farmland of Local Importance
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Other Land
- Other**
- Non-Agricultural Land



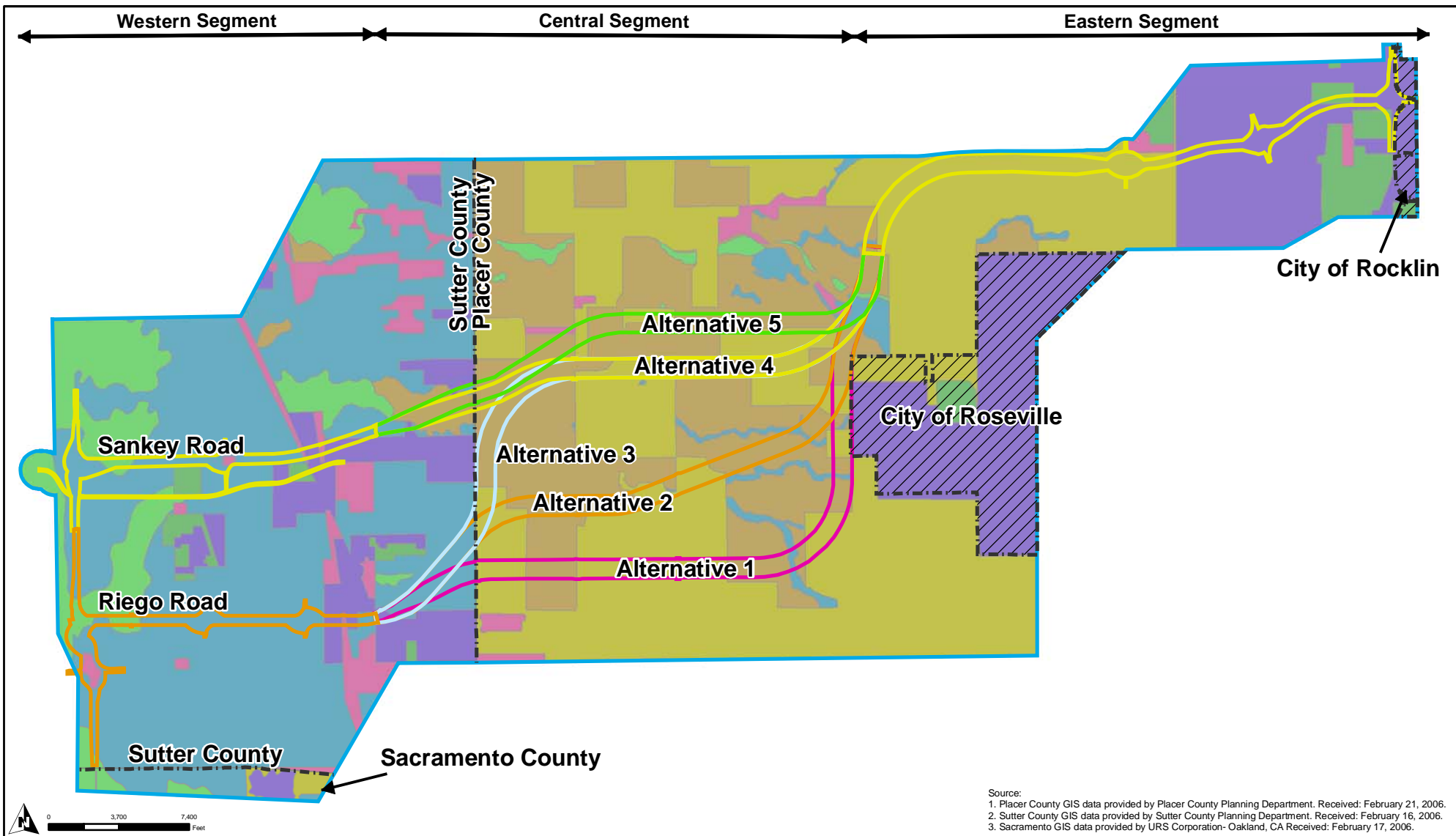
Tier 1 EIS/EIR

Important Farmland in  
Relation to Designated Land Use

**Figure 4.1-4  
(Revised)**

**January 2009**





Source:  
 1. Placer County GIS data provided by Placer County Planning Department. Received: February 21, 2006.  
 2. Sutter County GIS data provided by Sutter County Planning Department. Received: February 16, 2006.  
 3. Sacramento GIS data provided by URS Corporation- Oakland, CA Received: February 17, 2006.

**Placer County Important Farmland**

- Urban and Built Up Land
- Farmland of Statewide Importance
- Grazing Land
- Unique Farmland
- Farmland of Local Importance
- Other Land
- Prime Farmland

**Sutter County Important Farmland**

- Urban and Built Up Land
- Farmland of Statewide Importance
- Grazing Land
- Unique Farmland
- Prime Farmland
- Other Land

**Sacramento County Important Farmland**

- Grazing Land
- Farmland of Statewide Importance
- Farmland of Local Importance
- Unique Farmland
- Prime Farmland
- Other Land



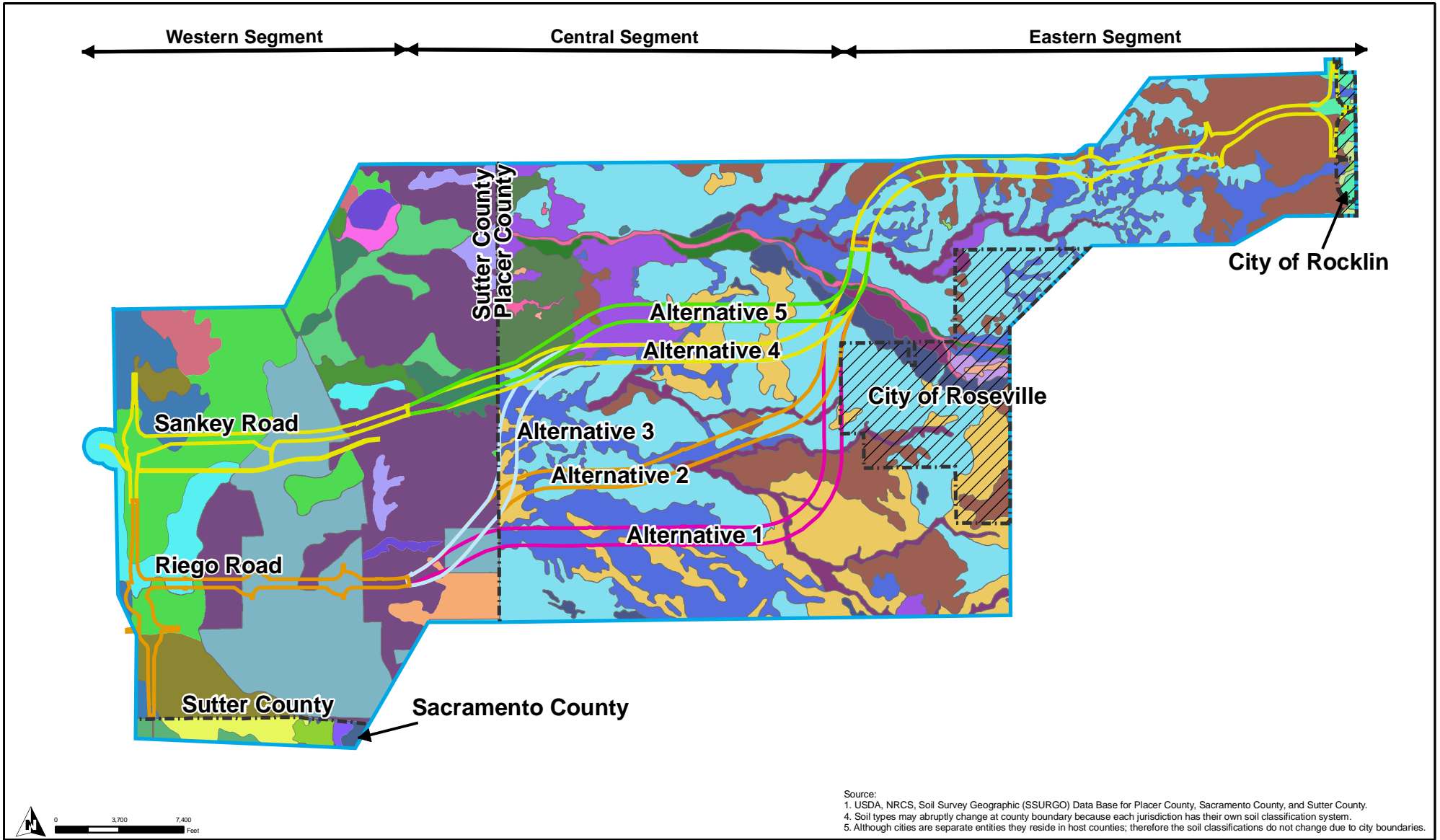
Tier 1 EIS/EIR

Important Farmland

Figure 4.4-1  
(Revised)

January 2009





Placer County Soil Types		Sutter County Soil Types		Sacramento County Soil Types	
104-ALAMO-FIDDYMENT COMPLEX, 0 TO 5 PERCENT SLOPES	162-KILGALA LOAM	104-CAPAY SILTY CLAY, 0 TO 2 PERCENT SLOPES	130-GALT CLAY, FREQUENTLY FLOODED, 0 TO 2 PERCENT SLOPES	115-CLEAR LAKE CLAY, HARDPAN SUBSTRATUM, DRAINED, 0 TO 1 PERCENT SLOPES	152-GALT CLAY, 0 TO 2 PERCENT SLOPES
140-COMETA SANDY LOAM, 1 TO 5 PERCENT SLOPES	175-RAMONA SANDY LOAM, 2 TO 9 PERCENT SLOPES	105-CAPAY SILTY CLAY, OCCASIONALLY FLOODED, 0 TO 2 PERCENT SLOPES	137-JACKTONE CLAY, 0 TO 2 PERCENT SLOPES	134-DIERSSSEN SANDY CLAY LOAM, DRAINED, 0 TO 2 PERCENT SLOPES	161-JACKTONE CLAY, DRAINED, 0 TO 2 PERCENT SLOPES
141-COMETA-FIDDYMENT COMPLEX, 1 TO 5 PERCENT SLOPES	181-SAN JOAQUIN SANDY LOAM, 1 TO 5 PERCENT SLOPES	109-CAPAY CLAY, HARDPAN SUBSTRATUM, 0 TO 2 PERCENT SLOPES	140-MARCUM CLAY LOAM, 0 TO 2 PERCENT SLOPES	159-SAN JOAQUIN SANDY LOAM, OCCASIONALLY FLOODED, 0 TO 2 PERCENT SLOPES	214-SAN JOAQUIN SILT LOAM, 0 TO 3 PERCENT SLOPES
142-COMETA-RAMONA SANDY LOAMS, 1 TO 5 PERCENT SLOPES	182-SAN JOAQUIN-COMETA SANDY LOAMS, 1 TO 5 PERCENT SLOPES	114-CLEAR LAKE CLAY, HARDPAN SUBSTRATUM, 0 TO 2 PERCENT SLOPES	142-MARCUM CLAY LOAM, OCCASIONALLY FLOODED, 0 TO 2 PERCENT SLOPES	160-SAN JOAQUIN-ARENENTS-DUROCHREPTS COMPLEX, 0 TO 1 PERCENT SLOPES	24-WATER
145-EXCHEQUER-ROCK OUTCROP COMPLEX, 2 TO 30 PERCENT SLOPES	193-XEROFUVENTS, OCCASIONALLY FLOODED	123-COMETA LOAM, 0 TO 2 PERCENT SLOPES	158-SAN JOAQUIN SANDY LOAM, 0 TO 2 PERCENT SLOPES	194PL-XEROFUVENTS, FREQUENTLY FLOODED	
146-FIDDYMENT LOAM, 1 TO 8 PERCENT SLOPES	194-XEROFUVENTS, FREQUENTLY FLOODED	128-EXETER SANDY LOAM, 0 TO 2 PERCENT SLOPES	159-SAN JOAQUIN SANDY LOAM, OCCASIONALLY FLOODED, 0 TO 2 PERCENT SLOPES		
147-FIDDYMENT-KASEBERG LOAMS, 2 TO 9 PERCENT SLOPES	195-XEROFUVENTS, HARDPAN SUBSTRATUM	129-GALT CLAY, 0 TO 2 PERCENT SLOPES	160-SAN JOAQUIN-ARENENTS-DUROCHREPTS COMPLEX, 0 TO 1 PERCENT SLOPES		
154-INKS-EXCHEQUER COMPLEX, 2 TO 25 PERCENT SLOPES	198-WATER				



Tier 1 EIS/EIR	Soil Types in Placer, Sacramento, and Sutter Counties	Figure 4.4-2 (Revised)
		January 2009



Page 4.4-17, text is revised as follows:

**Alternative 1 – the Red Alternative**

Alternative 1 would impact approximately ~~806.83~~1,587.78 acres of farmland within the study area, including ~~355.60~~357.14 acres of Farmland of Statewide Importance, Prime Farmland, and Grazing land in the Western Segment; ~~422.61~~619.93 acres of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing land in the Central Segment, and ~~28.62~~611.20 acres of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land in the Eastern Segment.

Page 4.4-17, last two paragraphs are revised as follows:

**Alternative 2 – the Orange Alternative**

Alternative 2 would potentially impact ~~990.06~~1,788.22 acres of farmland, ~~the most of any alternative~~. It would affect eight parcels and 243.7 acres of land currently under Williamson Act contract, all in Placer County. Farmland impacts in the Western and Eastern segments would be the same as described for Alternative 1. A total of ~~605.84~~819.88 acres of all farmland categories would be impacted in the Central Segment. Alternative 2 would pass through six parcels in the Central Segment with 123.85 acres of contracted land.

**Alternative 3 – the Blue Alternative**

Alternative 3 would impact ~~965.10~~1,814.17 acres of important farmlands within the study area, which is the greatest of all Alternatives. In addition, it would affect three parcels and 240.56 total acres of land currently under contract, all within Placer County. Alternative 3 farmland impacts in the Western and Eastern segments would be identical to those identified for Alternative 1. A total of ~~580.88~~845.84 acres of all the farmland categories within the Central Segment would be affected, ~~except for Farmland of Local Importance~~. The Alternative 3 alignment would pass through one parcel under contract in the Central Segment, affecting 120.71 acres of land.

Page 4.4-18, text is revised as follows:

**Alternative 4 – the Yellow Alternative**

Alternative 4 would impact ~~the least amount of~~1,590.20 acres of important farmland (~~792.46 acres~~) within the study area. This includes ~~304.68~~52 acres of impacts to Farmland of Statewide Importance, Prime Farmland, Farmland of Local Importance, and Grazing land in the Western Segment, and a total of ~~459.16~~674.48 acres of all the farmland categories within the Central Segment ~~except for Farmland of Local Importance~~. Farmland affected in the Eastern Segment of Alternative 4 would be the same as for Alternative 1.

**Alternative 5 – the Green Alternative**

Alternative 5 would impact ~~909.04~~the least amount of acres of farmland within the study area at 1,578.36 acres. This includes the same ~~304.68~~52 acres of impacts to Farmland of Statewide Importance, Prime Farmland, Farmland of Local Importance, and Grazing land as in Alternative 4 in the Western Segment; a total of ~~575.74~~662.64 acres inclusive of all the farmland categories within the Central Segment ~~except for Farmland of Local~~



importance; and the same ~~28.62~~611.20 acres of Unique Farmland impacts in the Eastern Segment as in all the corridor alignment alternatives.

**Comparison of Alternatives**

All of the build alternatives would affect more than 100 acres of Williamson Act contracted land; therefore, all are considered to have an impact on Williamson Act contracted land. The potential conversion of farmland associated with the alternatives (ranging from ~~792.46~~1,578.36 to ~~1,814.18~~990.06 acres) is considered “substantial.”

Alternative 1 would potentially affect ~~806.83~~1,587.78 acres of farmland and the least amount of Williamson Act protected property at 119.85 acres.

Alternative 2 would potentially affect ~~the greatest amount~~ 1,788.22 acres of farmland at ~~990.06~~ acres. However, this alternative would also impact the greatest amount of Williamson Act contracted land, 243.70 acres.

Alternative 3 would potentially affect ~~the greatest amount of farmland at~~ 1,814.17~~965.10~~ acres of farmland and 240.56 acres of Williamson Act land.

Alternative 4 would potentially affect ~~the least amount~~ 1,590.20 acres of farmland at ~~792.46~~ acres and would affect 240.62 acres of Williamson Act land.

Alternative 5 would potentially affect ~~the least amount of farmland at~~ 1,578.36 acres and would affect ~~909.04~~ acres of farmland and 240.26 acres of Williamson Act land.

Page 4.4-19, Table 4.4-8 is revised as shown in Revised Table 4.4-8.

**Revised Table 4.4-8  
Important Farmland Potentially Affected by Alignment Alternatives**

Placer Parkway Segment	Type of Farmland					
	Farmland of Local Importance	Farmland of Statewide Importance	Prime Farmland	Unique Farmland	Grazing Land	Total Farmland
Western Segment – Alternatives 1, 2, and 3	<del>00</del>	<del>275.24</del> <u>280.84</u>	<del>62.89</del> <u>62.8</u>	<del>00</del>	<del>19.01</del> <u>14.94</u>	<del>357.14</del> <u>355.60</u>
Western Segment – Alternatives 4 and 5	<del>00</del>	<del>238.63</del> <u>239.10</u>	<del>32.65</del> <u>32.6</u>	<del>00</del>	<del>33.24</del> <u>32.94</u>	<del>304.52</del> <u>304.68</u>
Central Segment – Alternative 1	<del>379.07</del>	<del>155.71</del> <u>144.19</u>	<del>5.62</del> <u>132.19</u>	<del>70.52</del> <u>139.25</u>	<del>8.61</del> <u>19.98</u>	<del>619.53</del> <u>422.61</u>
Central Segment – Alternative 2	<del>215.67</del> <u>158</u>	<del>186.66</del> <u>148.32</u>	<del>5.69</del> <u>246.72</u>	<del>399.94</del> <u>162.49</u>	<del>11.92</del> <u>11.73</u>	<del>819.88</del> <u>605.84</u>
Central Segment – Alternative 3	<del>242.11</del>	<del>183.97</del> <u>149.96</u>	<del>5.73</del> <u>202.32</u>	<del>402.07</del> <u>174.64</u>	<del>11.96</del> <u>11.96</u>	<del>845.84</del> <u>580.88</u>
Central Segment – Alternative 4	<del>192.32</del>	<del>58.80</del> <u>66.8</u>	<del>5.79</del> <u>128.74</u>	<del>414.51</del> <u>1260.6</u>	<del>3.06</del> <u>3.05</u>	<del>674.48</del> <u>459.16</u>
Central Segment – Alternative 5	<del>75.78</del>	<del>64.05</del> <u>79.94</u>	<del>6.00</del> <u>135.45</u>	<del>511.35</del> <u>360.07</u>	<del>5.46</del> <u>34</u>	<del>662.64</del> <u>575.74</u>
Eastern Segment – All Alternatives	<del>377.12</del>	<del>4.80</del>	<del>00</del>	<del>19.47</del> <u>28.62</u>	<del>209.81</del>	<del>611.20</del> <u>28.62</u>

Source: DOC FMMP-2002 data for Placer County and 2004 data for Sutter County; and California Spatial Information Library GIS database.

Page 4.4-21, text is revised as follows:

Depending on the alternative, the project could impact between ~~792.46 and 990.06~~ 1,578.36 and 1,814.18 acres of farmland and between 119.85 and 243.70 acres of Williamson Act contracted land. As shown on Table 4.4-10, other anticipated urban development and roadway projects (excluding the Parkway) in the study area would convert an additional 5,268.92 acres of Farmland of Statewide Importance, 5,865.78 acres of Farmland of Local Importance, 817.19 acres of Prime Farmland, 2,499.51 acres of Unique Farmland, and 1,301.14 acres of Grazing land ~~5,203 acres of Farmland of Statewide Importance, 1,429 acres of Prime Farmland, 6,687 acres of Unique Farmland, and 250 acres of Grazing Land~~. The converted farmland would also include nearly 717 acres of Williamson Act contracted land within Sutter and Placer counties, as shown in Table 4.4-11.

Page 4.4-22, Table 4.4-10 is revised as follows:

**Revised Table 4.4-10  
Cumulative Impacts to Farmland (Acres)**

Type of Farmland	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Cumulative Projects (excluding Placer Parkway)
Farmland of Local Importance	<u>756.19</u> 0	<u>592.79</u> 4.58	<u>619.23</u> 0	<u>569.44</u> 0	<u>452.9</u>	<u>5,865.78</u> 0
Farmland of Statewide Importance	<u>435.75</u> <u>425.35</u>	<u>466.70</u> 464.24	<u>464.01</u> 472.77	<u>302.23</u> 305.90	<u>307.48</u> 319.01	<u>5,268.92</u> 5,203.00
Prime Farmland	<u>68.51</u> 195.90	<u>68.58</u> 309.46	<u>68.62</u> 265.20	<u>38.44</u> 45.35	<u>38.65</u> 168.09	<u>817.19</u> 1,429.00
Unique Farmland	<u>89.99</u> <u>168.6</u> 9	<u>419.41</u> <u>149.0</u> 70	<u>421.54</u> <u>174.6</u> 4	<u>433.98</u> <u>289.</u> 22	<u>530.82</u> <u>388.</u> 69	<u>2,499.51</u> 6,687.00
Grazing Land	<u>237.43</u> <u>22.2</u> 8	<u>240.74</u> <u>23.8</u> 3	<u>240.78</u> <u>23.87</u>	<u>246.11</u> <u>35.9</u> 9	<u>248.51</u> <u>32.2</u> 5	<u>1,301.14</u> 250.00
Total of all types of Farmland	<u>1587.87</u> <u>806.83</u>	<u>1,788.22</u> <u>990.06</u>	<u>1,814.18</u> <u>936.48</u>	<u>1,590.20</u> <u>792.46</u>	<u>1,578.36</u> <u>908.04</u>	<u>15,752.54</u> <u>13,569.00</u>
Total for Cumulative Projects, including Placer Parkway	<u>17,340.414</u> <u>4,375.83</u>	<u>17,540.764</u> <u>4,559.06</u>	<u>17,566.7214</u> <u>,505.48</u>	<u>17,342.744</u> <u>4,245.46</u>	<u>17,330.904</u> <u>4,477.04</u>	N/A

Source: URS and NFA GIS database, with NFA data analysis

Page 4.4-22, the second sub-bullet under the first bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone.

Page 4.4-23, the second bullet under Tier 2 – Mitigation Considerations is revised as follows:

Farmland impacts could be reduced via land purchase/leases that would allow for continued use of the no-development buffer zone for agricultural purposes, subject to performance standards to be developed in Tier 2.

Page 4.4-23, the third sentence of the third bullet under Tier 2 – Mitigation Considerations is revised as follows:

The no-development buffer zone as proposed would meet much of this mitigation goal, subject to performance standards to be developed in Tier 2.

Page 4.4-24, the last sub-bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone.

Page 4.4-25, the first sentence of the second bullet under Tier 2 – Mitigation Considerations is revised as follows:

Farmland impacts could be reduced via land purchase/leases that would allow for continued use of the no-development buffer zone for agricultural purposes, subject to performance standards to be developed in Tier 2.

## **Section 4.5 Public Services and Utilities**

Page 4.5-7, insert the following sentence after the first sentence of the second to last paragraph:

Since this comment was received, the project containing a potential future site for a university has been delayed or withdrawn. There are currently no pending land use applications for the southernmost portion of Reason Farms. However, in the meantime, the City of Roseville has approved the annexation of Reason Farms into the City. As of August 2009, the annexation application is being processed by the Local Agency Formation Commission (LAFCO).

Page 4.5-15, the second sentence of the first bullet is revised as follows:

Coordination will include development of specific project design details for the Parkway and other projects to minimize impacts, such as the location of the roadway footprint within the adopted corridor, and cooperation between PCTPA and local jurisdictions to ensure other planned facilities are located outside of the Parkway corridor and/or no-development buffer zone, where impacts to such facilities may be minimized, subject to performance standards to be developed in Tier 2.

## **Section 4.6 Visual/Aesthetics**

Page 4.6-21, the last paragraph is revised as follows:

Based on a Tier 1 analysis, Alternative 1 is consistent with local General Plan policies and goals. This alternative would provide a buffer between the roadway that eventually would be constructed and adjacent uses, subject to performance standards to be developed in Tier 2, and would include context-appropriate landscaping concepts, and be compatible with planned trail systems. Roadway design details have not been developed for this Tier 1 EIS/EIR.

Page 4.6-35, the first sentence of the second sub-bullet of the second bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.5) that would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone, subject to performance standards to be developed in Tier 2.

### Section 4.7 Cultural Resources

Page 4.7-26, the second sentence of the last bullet is revised as follows:

Following this evaluation~~the Tier 2 analysis~~, if the Parkway is expected to result in adverse impacts on NRHP and CRHR properties, then efforts will be made to develop a roadway design within the chosen corridor that avoids or minimize impacts on these resources as far as possible.

### Section 4.8 Traffic and Transportation

Page 4.8-9, Table 4.8-2 is revised as follows:

**Revised Table 4.8-2  
Level of Service Definitions – Daily Segment-Based Analysis**

Roadway Capacity Class	Maximum Daily Traffic Volume Per Lane for Each Level of Service Designation				
	A	B	C	D	E
1) Arterial – High Access Control	6,000	7,000	8,000	9,000	10,000
2) Arterial – Moderate Access Control	5,400	6,300	7,200	8,100	9,000
3) Arterial and Collector – Low Access Control	4,500	5,250	6,000	<u>6,750</u> <del>870</del>	7,500
4) Expressway – Level Terrain	4,050	6,620	9,450	12,150	13,500
5) Freeway – Level Terrain	6,300	10,620	13,680	16,740	18,000
6) Rural Roadway	1,500	2,950	4,800	7,750	12,500

Sources: Placer County General Plan EIR and Sacramento County General Plan EIR

Page 4.8-25, the following language is added as the fourth bullet:

- In unincorporated Sacramento County the proposed project would cause a roadway segment operating at LOS E or better conditions to deteriorate to LOS F conditions. If a roadway segment already operates below the LOS E standard, the proposed project would cause roadway operations to deteriorate by one grade or cause the volume to capacity ratio to increase by at least 0.05.

Pages 4.8-35–4.8-38, Table 4.8-8 is revised as shown on the attached Revisions to Table 4.8-8.

Pages 4.8-39–4.8-42, Table 4.8-9 is revised as shown on the attached Revisions to Table 4.8-9.

Pages 4.8-53–4.8-56, Table 4.8-11 is revised as shown on the attached Revisions to Table 4.8-11.

Pages 4.8-57–4.8-60, Table 4.8-12 is revised as shown on the attached Revisions to Table 4.8-12.

Pages 4.8-77–4.8-81, Table 4.8-25 is revised as shown on the attached Revisions to Table 4.8-25.

Pages 4.8-82–4.8-86, Table 4.8-26 is revised as shown on the attached Revisions to Table 4.8-26.

Pages 4.8-101–4.8-104, Table 4.8-28 is revised as shown on the attached Revisions to Table 4.8-28.

Pages 4.8-105–4.8-108, Table 4.8-29 is revised as shown on the attached Revisions to Table 4.8-29.

**Revisions to Table 4.8-8  
Estimated Daily Traffic Volumes for Build Alternatives under 2020 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Daily Traffic Volume	Estimated 2020 Daily Traffic Volumes						
		2005	2020		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<u>6</u> <del>2</del>	9,800	38,100	37,800	37,600	37,500	37,500	37,600
89	<u>Park Drive</u> <del>Valley View Parkway</del>	West of <u>Valley View Parkway</u> <del>Park Drive</del>	<u>4</u> <del>NA</del>	4	<u>1,100</u> <del>NA</del>	10,300	10,800	10,900	10,900	10,900	10,800
96	Watt Avenue	South of Baseline Road	2	6	7,100	<u>10,600</u> <del>4,900</del>	<u>10,700</u> <del>4,700</del>	<u>10,600</u> <del>4,600</del>	<u>10,700</u> <del>4,500</del>	<u>10,700</u> <del>4,600</del>	<u>10,700</u> <del>4,600</del>
98	Watt Avenue	<del>South</del> <u>North</u> of Elkhorn Boulevard	4	6	38,700	<u>51,800</u> <del>38,000</del>	<u>51,800</u> <del>38,300</del>	<u>51,700</u> <del>38,100</del>	<u>51,800</u> <del>38,000</del>	<u>51,700</u> <del>38,100</del>	<u>51,700</u> <del>37,800</del>
111	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>15,400</u>	<u>15,700</u>	<u>15,800</u>	<u>15,700</u>	<u>15,700</u>	<u>15,700</u>

Notes:  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> Traffic volumes on state highways are 2004. Counts on some local roadways were taken in 2005.  
 Source: DKS Associates, 2007

**Revisions to Table 4.8-9  
Estimated Change in Daily Traffic Volumes for Build Alternatives under 2020 Conditions**

Roadway		Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Daily Traffic Volume	No-Build 2020 Daily Traffic Volume	Estimated Change in 2020 Daily Traffic Volumes Compared to No-Build Alternative				
			2005	2020			Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<u>6</u> <del>2</del>	9,800	38,100	-300	-500	-600	-600	-500
89	<del>Park Drive</del> <del>Valley View</del> <del>Parkway</del>	West of Valley View Parkway <del>Park Drive</del>	<u>4</u> NA	4	<u>1,100</u> NA	10,300	500	600	600	600	500
96	Watt Avenue	South of Baseline Road	2	6	7,100	<u>10,600</u> <del>4,900</del>	<u>100</u> <del>-200</del>	<u>0</u> <del>-300</del>	<u>100</u> <del>-400</del>	<u>100</u> <del>-300</del>	<u>100</u> <del>-300</del>
98	Watt Avenue	<del>South</del> <u>North</u> of Elkhorn Boulevard	4	6	38,700	<u>51,800</u> <del>38,000</del>	<u>0</u> <del>300</del>	<u>-100</u> <del>100</del>	0	<u>-100</u> <del>100</del>	<u>-100</u> <del>-200</del>
<u>111</u>	<u>Valley View</u> <u>Parkway</u>	<u>East of Park</u> <u>Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>15,400</u>	<u>300</u>	<u>400</u>	<u>300</u>	<u>300</u>	<u>300</u>

Notes:  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> Traffic volumes on state highways are 2004. Counts on some local roadways were taken in 2005  
 Source: DKS Associates, 2007

**Revisions to Table 4.8-11  
Estimated Volume/Capacity Ratios on Roadway Segments for Build Alternatives under 2020 Conditions**

Roadway		Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Volume/ Capacity Ratio	Estimated 2020 Volume/Capacity Ratios on Roadway Segment					
			2005	2020		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<u>6</u> <del>2</del>	0.18	0.71	0.70	0.70	0.69	0.69	0.70
89	<del>Park Drive</del> Valley View Parkway	West of Valley View Parkway <del>Park Drive</del>	<del>4</del> NA	4	<u>0.03</u> NA	0.29	0.30	0.30	0.30	0.30	0.30
96	Watt Avenue	South of Baseline Road	2	6	0.39	<u>0.20</u> <del>09</del>	<u>0.20</u> <del>09</del>	<u>0.20</u> <del>09</del>	<u>0.20</u> <del>08</del>	<u>0.20</u> <del>09</del>	<u>0.20</u> <del>09</del>
98	Watt Avenue	<del>South</del> North of Elkhorn Boulevard	4	6	1.08	<u>0.96</u> <del>70</del>	<u>0.96</u> <del>74</del>	<u>0.96</u> <del>74</del>	<u>0.96</u> <del>70</del>	<u>0.96</u> <del>74</del>	<u>0.96</u> <del>70</del>
<u>111</u>	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>0.86</u>	<u>0.87</u>	<u>0.88</u>	<u>0.87</u>	<u>0.87</u>	<u>0.87</u>

Notes:  
Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> LOSs on state highways are from 2004.  
Source: DKS Associates, 2007

**Revisions to Table 4.8-12  
Estimated Level of Service on Roadway Segments for Build Alternatives under 2020 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Level of Service	Estimated 2020 Level of Service on Roadway Segment						
		2005	2020		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
83	Sunset Boulevard	East of Blue Oaks Boulevard	6	<u>6</u> <sup>2</sup>	A	C	C	B	B	B	B
89	<del>Park Drive</del> Valley View Parkway	West of <del>Valley View</del> Park Drive	<del>4</del> NA	4	<del>A</del> NA	A	A	A	A	A	A
98	Watt Avenue	<del>South</del> North of Elkhorn Boulevard	4	6	F	<del>E</del> G	<del>E</del> G	<del>E</del> G	<del>E</del> G	<del>E</del> G	<del>E</del> G
<u>111</u>	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>D</u>	<u>D</u>	<u>D</u>	<u>D</u>	<u>D</u>	<u>D</u>

Notes:  
 NA = not applicable  
 Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> LOS on state highways are from 2004.  
 Source: DKS Associates, 2007



**Revisions to Table 4.8-25  
Estimated Daily Traffic Volumes for Build Alternatives under 2040 Conditions**

Roadway		Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Daily Traffic Volume	Estimated 2040 Daily Traffic Volumes					
			2005 <sup>4</sup>	2040		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
89	Park Drive Valley View Parkway	West of Valley View Parkway Park Drive	<u>4</u> NA	<u>42</u>	<u>1,100</u> NA	12,700	15,400	15,500	15,500	15,500	15,500
98	Watt Avenue	SouthNorth of Elkhorn Boulevard	4	6	38,700	51,500	51,700	51,200	51,500	51,700	51,400
<u>111</u>	<u>Valley View Parkway</u>	<u>East of Park Drive</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>18,000</u>	<u>20,200</u>	<u>20,300</u>	<u>20,300</u>	<u>20,300</u>	<u>20,300</u>

Notes:  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> Traffic volumes on state highways are from 2004. Counts on some local roadways were taken prior to 2005  
 NA = not applicable  
 Source: DKS Associates, 2007

**Revisions to Table 4.8-26  
Estimated Change in Daily Traffic Volumes Compared to No-Build Alternative under 2040 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>4</sup> Daily Traffic Volume	No-Build 2040 Daily Traffic Volume	Estimated Change in 2040 Daily Traffic Volumes Compared to No-Build Alternative						
		2005 <sup>4</sup>	2040			Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5		
89	Park Drive Valley View Parkway	West of Valley View Parkway Park Drive	4 NA	4 2	1,100 NA	12,700	2,700	2,800	2,800	2,800	2,800	2,800
98	Watt Avenue	South of Elkhorn Boulevard	4	6	38,700	51,500	200	-300	0	200	-100	
111	Valley View Parkway	East of Park Drive	NA	2	NA	18,000	2,200	2,300	2,300	2,300	2,300	

Notes:  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> Traffic volumes on state highways are from 2004. Counts on some local roadways were taken in 2005  
 NA = not applicable  
 Source: DKS Associates, 2007

**Revisions to Table 4.8-28  
Estimated Volume/Capacity Ratios on Roadway Segments for Build Alternatives under 2040 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>2</sup> Volume/ Capacity Ratio	Estimated 2040 Volume/Capacity Ratios on Roadway Segment						
		2005 <sup>4</sup>	2040		No- Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
89	<u>Park Drive</u> <u>Valley View</u> <u>Parkway</u>	West of <u>Valley View</u> <u>Parkway</u> <u>Park Drive</u>	<u>4</u> NA	<u>42</u>	<u>0.03</u> NA	<u>0.35</u> 71	<u>0.43</u> 86	<u>0.43</u> 86	<u>0.43</u> 86	<u>0.43</u> 86	<u>0.43</u> 86
98	Watt Avenue	<u>South</u> <del>North</del> of Elkhorn Boulevard	4	6	1.08	0.95	0.96	0.95	0.95	0.96	0.95
<u>111</u>	<u>Valley View</u> <u>Parkway</u>	<u>East of Park</u> <u>Drive</u>	NA	<u>2</u>	NA	<u>1.00</u>	<u>1.12</u>	<u>1.13</u>	<u>1.13</u>	<u>1.13</u>	<u>1.13</u>

Notes:  
 Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> LOS on state highways are from 2004.  
 NA = not applicable  
 Source: DKS Associates, 2007

**Revisions to Table 4.8-29  
Estimated Level of Service on Roadway Segments for Build Alternatives under 2040 Conditions**

Roadway	Segment	Travel Lanes <sup>1</sup>		2005 <sup>4</sup> Level of Service	Estimated 2040 Level of Service on Roadway Segment					
		2005 <sup>4</sup>	2040		No-Build	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
89	<u>Park Drive</u> <u>Valley View Parkway</u>	<u>4</u> NA	<u>4</u> 2	<u>A</u> NA	<u>A</u> C	<u>A</u> D	<u>A</u> D	<u>A</u> D	<u>A</u> D	<u>A</u> D
98	Watt Avenue	4	6	F	E	E	E	E	E	E
111	<u>Valley View Parkway</u>	<u>NA</u>	<u>2</u>	<u>NA</u>	<u>E</u>	<u>E</u>	<u>E</u>	<u>E</u>	<u>E</u>	<u>E</u>

Notes:  
 Shaded cells represent potential LOS impacts based on policies of jurisdictions and agencies in the study area.  
<sup>1</sup> +2 = Plus two HOV lanes  
<sup>2</sup> LOS on state highways are 2004.  
 NA = not applicable  
 Source: DKS Associates, 2007

Page 4.8-121, the last sub-bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone, including the provision of additional future interchanges which would affect the long-term reliable travel time reductions provided by the Parkway, subject to performance standards to be developed in Tier 2.

Page 4.8-123, the first full paragraph is revised as follows:

The growth in traffic demand on SR 65 will stem from development over a wide area. Traffic impact fees on this new development are a potential source of funding for improvements in the SR 65 corridor. The South Placer Regional Transportation Authority (SPRTA); adopted the Regional Transportation and Air Quality Mitigation fee, which assesses new development for impacts on specified regional transportation facilities. One of these projects is to widen SR 65 between I-80 and Twelve Bridges Drive. In 2009, Placer County and the cities of Lincoln, Rocklin, and Roseville adopted a Tier II MOA fee program, which includes \$480 million to fund the Placer Parkway. This funding will include improvements for the SR 65/Parkway/Whitney Ranch Parkway interchange and contribute \$5 million to the improvement to improve the I-80/SR 65 interchange. which currently collects traffic impact fees for various improvements to regional roadways in south Placer County (called Tier 1 projects), has considered additional fees for a set of Tier 2 projects that would include improvements to SR 65 between Lincoln and I-80.

Page 4.8-124, last paragraph under the Whitney Ranch Parkway is revised as follows:

The growth in traffic demand on Whitney Ranch Parkway will stem from development in portions of the cities of Rocklin and Lincoln as well as unincorporated Placer County. Traffic impact fees on this new development are a potential source of funding for improvements to Whitney Ranch Parkway. The City of Rocklin has development fees for roadway improvements. ~~To spread the cost of improvements on a fair share basis to portions of several jurisdictions, some mechanism such as a multi-jurisdictional Joint Powers Authority, would need to be established.~~ The South Placer Regional Transportation Authority (SPRTA) adopted the Regional Transportation and Air Quality Mitigation fee, which assesses new development for impacts on specified regional transportation facilities. One of these projects is to widen SR 65 between I-80 and Twelve Bridges Drive. In 2009, Placer County and the cities of Lincoln, Rocklin, and Roseville adopted a Tier II MOA fee program which includes \$480 million to fund the Placer Parkway. This funding will include improvements for the SR 65/Parkway/Whitney Ranch Parkway interchange and contribute \$5 million to the improvement to improve the I-80/SR 65 interchange.

Page 4.8-124, second paragraph under Valley View Parkway, a new third sentence is added:

The City of Rocklin does not view this mitigation strategy as an option for impacts on Valley View Parkway.

Page 4.8-125, insert the following sentence at the end of the first full paragraph:

The details of such intersection improvements and the resulting levels of service would be determined in a subsequent Tier 2 EIS/EIR.

## Section 4.9 Air Quality

Page 4.9-2, PM<sub>2.5</sub> row of Table 4.9-1 is revised as follows:

**Revisions to Table 4.9-1  
Federal and State Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards <sup>1</sup>		Federal Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Fine Particulate Matter (PM <sub>2.5</sub> )	24 hours	No Separate State Standard		65-35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	15 µg/m <sup>3</sup>		

Page 4.9-5, the last sentence of the third paragraph is revised as follows:

In addition, because Placer Parkway includes a 500- to 1,000-foot no-development buffer zone, residential or other sensitive uses ~~will~~ may not be sited within the 500-foot guidance limit established by some agencies, subject to performance standards to be developed in Tier 2.

Page 4.9-8, insert the following sentence at the end of the second paragraph before the last sentence:

A station operating in Pleasant Grove until 2002 was closer to the project area. However, the Pleasant Grove air monitoring station was closed in 2002, therefore no data was collected for any ambient air quality pollutants for the years 2005 through 2007. Instead data from the Woodland monitoring station is presented for the years 2005-2007.

Page 4.9-8, Table 4.9-4, which comprised Pleasant Grove monitoring data, is deleted.

Page 4.9-8, first paragraph, is revised as follows:

~~A new Efforts are currently underway to develop and submit an 8-hour O<sub>3</sub> attainment plan, the 2009 Sacramento Metropolitan Area 8-Hour Ozone Attainment Plan, was submitted to the CARB for approval in March 2009. In addition, the Sacramento area air districts have requested re-designation from “serious” non-attainment to “severe” non-attainment, with an extended attainment deadline of by June 2007. Currently, the attainment date for the Sacramento region with the 8-hour O<sub>3</sub> standard is June 15, 2013.~~

Page 4.9-13, the following three sentences are added to the first paragraph after the fourth sentence:

Measured concentrations at the Roseville and North Highlands monitoring stations exceeded the federal and state 8-hour O<sub>3</sub> standards in 2005, 2006 and 2007. Measured concentrations at the Woodland monitoring station exceeded the federal and state 8-hour O<sub>3</sub> standard in 2005 and 2006. The O<sub>3</sub> concentration at the Woodland station only exceeded the state 8-hour O<sub>3</sub> standard in 2007.

Page 4.9-13, the following sentence is deleted from the paragraph:

~~O<sub>3</sub> concentrations in the project area consistently exceed federal and state ambient air quality standards.~~

Page 4.9-13, the following table is added after the first paragraph in order to present Woodland monitoring data:

**Revised Table 4.9-4  
Maximum Measured Pollutant Concentrations  
at Woodland, California, Monitoring Station**

Pollutant	Averaging Time	Units	Standards		Maximum Measured Concentration			
			Federal	State	2005	2006	2007	2008
O <sub>3</sub>	1 hour	ppm	None	0.09	0.099 <sup>(2)</sup>	0.106 <sup>(2)</sup>	0.106 <sup>(2)</sup>	<u>0.100</u>
	8 hours	ppm	0.08	0.070	0.086 <sup>(1,2)</sup>	0.090 <sup>(1,2)</sup>	0.077 <sup>(2)</sup>	<u>0.087<sup>(1,2)</sup></u>
PM <sub>10</sub>	24 hours	µg/m <sup>3</sup>	150	50	59.0 <sup>(2)</sup>	77.0 <sup>(2)</sup>	119.0 <sup>(2)</sup>	<u>181.1<sup>(2)</sup></u>
	Annual Average	µg/m <sup>3</sup>	50	20	24.0 <sup>(2)</sup>	25.0 <sup>(2)</sup>	25.0 <sup>(2)</sup>	<u>32.9<sup>(2)</sup></u>
PM <sub>2.5</sub>	24 hours	µg/m <sup>3</sup>	35	None	35.0	44.0 <sup>(1)</sup>	42.0 <sup>(1)</sup>	<u>41.9<sup>(1)</sup></u>
	Annual Average	µg/m <sup>3</sup>	15	12	8.44	9.30	8.25	*
NO <sub>2</sub>	1 hour	ppm	None	0.25	NA	NA	NA	<u>NA</u>
	Annual Average	ppm	0.053	None	NA	NA	NA	<u>NA</u>
CO	1 hour	ppm	35	20	NA	NA	NA	<u>NA</u>
	8 hours	ppm	9	9.0	NA	NA	NA	<u>NA</u>
SO <sub>2</sub>	1 hour	ppm	None	0.25	NA	NA	NA	<u>NA</u>
	3 hours	ppm	0.5	None	NA	NA	NA	<u>NA</u>
	24 hours	ppm	0.14	0.04	NA	NA	NA	<u>NA</u>
	Annual Average	ppm	0.030	None	NA	NA	NA	<u>NA</u>

Source: Monitoring Station is located at 41929 E. Gibson Road, Woodland, California

Notes: 1. Exceeds the federal standard  
2. Exceeds the state standard  
NA = not available because data were not collected at this station. This station was closed in 2002.  
\* Insufficient data available throughout the year to determine the value

Page 4.9-13, Table 4.9-5 is revised as follows:

**Revised Table 4.9-5  
Maximum Measured Pollutant Concentrations at  
Roseville, California (I-80), Monitoring Station**

Pollutant	Averaging Time	Units	Standards		Maximum Measured Concentration			
			Federal	State	2005	2006	2007	2008
O <sub>3</sub>	1 hour	ppm	None	0.09	0.118 <sup>(2)</sup>	0.121 <sup>(2)</sup>	0.109 <sup>(2)</sup>	0.134 <sup>(2)</sup>
	8 hours	ppm	0.08	0.070	0.106 <sup>(1,2)</sup>	0.098097 <sup>(1,2)</sup>	0.404100 <sup>(1,2)</sup>	0.106 <sup>(1,2)</sup>
PM <sub>10</sub>	24 hours	µg/m <sup>3</sup>	150	50	58.0 <sup>(2)</sup>	5554.0 <sup>(2)</sup>	4543.0	74.2
	Annual Average <sup>(3)</sup>	µg/m <sup>3</sup>	50	20	19.1	22.0 <sup>(2)</sup>	17.0	22.4
PM <sub>2.5</sub>	24 hours	µg/m <sup>3</sup>	35	None	59.2 <sup>(1)</sup>	54.745.0 <sup>(1)</sup>	48.730.0 <sup>(1)</sup>	60.0 <sup>(1)</sup>
	Annual Average <sup>(4)</sup>	µg/m <sup>3</sup>	15	12	10.0	10.5	128.24 <sup>(2)</sup>	10.0 <sup>(2)</sup>
NO <sub>2</sub>	1 hour	ppm	None	0.25	0.079	0.063	0.058	0.067
	Annual Average	ppm	0.053	None	0.013	0.013	0.012	0.012
CO	1 hour	ppm	35	20	2.0	NA	NA	NA
	8 hours	ppm	9	9.0	1.27	NA	NA	NA
SO <sub>2</sub>	1 hour	ppm	None	0.25	NA	NA	NA	NA
	3 hours	ppm	0.5	None	NA	NA	NA	NA
	24 hours	ppm	0.14	0.04	NA	NA	NA	NA
	Annual Average	ppm	0.030	None	NA	NA	NA	NA

Source: Monitoring station located at 151 N. Sunrise Blvd., Roseville, California

Notes: 1. Exceeds the federal standard  
2. Exceeds the state standard  
3. Based on National Annual Average values  
4. Based on State Annual Average values

NA = not available because data were not collected at this station.

Page 4.9-13, the last paragraph is revised as follows:

Measured concentrations at the Roseville monitoring station have not exceeded federal PM<sub>10</sub> 24-hour and annual average standards over the past 3 years. However, the state PM<sub>10</sub> 24-hour standard was exceeded in 2003 and 2006 and the annual average standard was exceeded in 2003 and 2004. The federal 24-hour PM<sub>2.5</sub> standard at the Roseville was exceeded in 2005, 2006 and 2007 as a result of the federal standard being reduced from 65 µg/m<sup>3</sup> to 35 µg/m<sup>3</sup>. The last exceedance of the state annual average PM<sub>2.5</sub> standard at the Roseville station was in 2002. Measured concentrations at the Woodland and North Highlands monitoring stations exceeded the state 24-hour and annual average standards over the past 3 years. The federal 24-hour PM<sub>2.5</sub> standard at the Woodland station was exceeded in 2006 and 2007. As of January 2006, Sutter, Placer, and Sacramento counties are federally designated as unclassifiable/attainment for PM<sub>2.5</sub>. With regard to the state standard, Sutter County is designated as unclassified for PM<sub>2.5</sub>, and Placer and Sacramento counties are designated as non-attainment for PM<sub>2.5</sub>.



Page 4.9-14, Table 4.9-6 is revised as follows:

**Revised Table 4.9-6  
Maximum Measured Pollutant Concentrations at  
North Highlands, California, Monitoring Station**

Pollutant	Averaging Time	Units	Standards		Maximum Measured Concentration			
			Federal	State	2005	2006	2007	2008
O <sub>3</sub>	1 hour	ppm	None	0.09	0.103 <sup>(2)</sup>	0.135 <sup>(2)</sup>	0.109 <sup>(2)</sup>	<u>0.121<sup>(2)</sup></u>
	8 hours	ppm	0.08	0.070	0.086 <sup>(1,2)</sup>	0.093 <sup>(1,2)</sup>	0.096 <sup>(1,2)</sup>	<u>0.081<sup>(1,2)</sup></u>
PM <sub>10</sub>	24 hours	µg/m <sup>3</sup>	150	50	110.0 <sup>(2)</sup>	<del>67</del> 65.0 <sup>(2)</sup>	<del>59</del> 56.0 <sup>(2)</sup>	<u>97.0<sup>(2)</sup></u>
	Annual Average <sup>(3)</sup>	µg/m <sup>3</sup>	50	20	27.2 <sup>(2)</sup>	25.9 <sup>(2)</sup>	24.0 <sup>(2)</sup>	<u>29.0<sup>(2)</sup></u>
PM <sub>2.5</sub>	24 hours	µg/m <sup>3</sup>	35	None	NA	NA	NA	<u>NA</u>
	Annual Average	µg/m <sup>3</sup>	15	12	NA	NA	NA	<u>NA</u>
NO <sub>2</sub>	1 hour	ppm	None	0.25	0.060	0.097	0.127	<u>0.115</u>
	Annual Average	ppm	0.053	None	0.011	NA	0.013	<u>*</u>
CO	1 hour	ppm	35	20	8.0	7.5	5.1	2.3
	8 hours	ppm	9	9.0	2.86	2.70	1.73	<u>1.90</u>
SO <sub>2</sub>	1 hour	ppm	None	0.25	NA	NA	NA	<u>NA</u>
	3 hours	ppm	0.5	None	NA	NA	NA	<u>NA</u>
	24 hours	ppm	0.14	0.04	0.002	0.003	0.004	<u>0.002</u>
	Annual Average	ppm	0.030	None	0.001	0.001	0.001	<u>0.001</u>

Source: Monitoring station located at 7823 Blackfoot Way, North Highlands, California

Notes: 1. Exceeds the federal standard  
2. Exceeds the state standard  
3. Based on National Annual Average values

NA = not available because data were not collected at this station.  
\* Insufficient data available throughout the year to determine the value

Page 4.9-14, the following sentence is added to the paragraph following Table 4.9-6:

No measured concentrations were available at the Woodland monitoring station for the 1-hour or the 8-hour CO standard.

Page 4.9-14, the third and fourth paragraphs following Table 4.9-6 are revised as follows:

Tables 4.9-4 through 4.9-6 show that measured concentrations of NO<sub>2</sub> in the project area have consistently remained well below the federal and state standards. NO<sub>2</sub> concentrations were not measured at the Woodland monitoring station. With similar trends throughout the region (and state), the area is well within federal and state NO<sub>2</sub> standards.

SO<sub>2</sub> is a colorless acidic gas with a strong odor. Sources and health effects of SO<sub>2</sub> are provided in the Air Quality Technical Memorandum. Table 4.9-6 shows that measured concentrations of SO<sub>2</sub> at the North Highlands monitoring station have consistently remained well below the federal and state 24-hour and annual average SO<sub>2</sub> standards. SO<sub>2</sub> is not measured at the Roseville or ~~Pleasant Grove~~ Woodland monitoring stations. The air basin is designated as unclassified/attainment for federal and state standards. Sulfur oxides (SO<sub>x</sub>) include SO<sub>2</sub> and other oxides of sulfurs and are reported in this analysis as equivalent to SO<sub>2</sub>.

Page 4.9-15, second paragraph, third sentence is revised as follows:

Tables 4.9-7 and 4.9-8 present a summary of the estimated ~~2005-2006~~ pollutant emission data for Sutter County and the Sacramento Valley portion of Placer County.

Page 4.9-15, Table 4.9-7 is revised as follows:

**Revised Table 4.9-7**  
**Summary of ~~2005~~ 2008 Estimated Annual Average Emissions in Sutter County**  
**(lbs/day)**

Source	ROG	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Stationary Sources</b>						
Fuel Combustion	<del>1,200</del> <u>760</u>	<del>3,600</del> <u>2,760</u>	<del>10,200</del> <u>7,340</u>	<del>200</del> <u>40</u>	<del>600</del> <u>540</u>	<del>800</del> <u>420</u>
Cleaning and Surface Coatings	<del>1,200</del> <u>640</u>	0	0	0	0	0
Petroleum Production and Marketing	<del>5,440</del> <u>5,200</u>	0	0	0	0	0
Industrial Processes	<del>0</del> <u>20</u>	0	0	0	<del>2,800</del> <u>2,780</u>	<del>1,200</del> <u>1,180</u>
<b>Total Stationary Sources</b>	<b><del>7,600</del> <u>6,860</u></b>	<b><del>3,600</del> <u>2,760</u></b>	<b><del>10,200</del> <u>7,340</u></b>	<b><del>200</del> <u>40</u></b>	<b><del>3,400</del> <u>3,200</u></b>	<b><del>2,000</del> <u>1,700</u></b>
<b>Area Sources</b>						
Solvent Evaporation	<del>4,000</del> <u>3,700</u>	0	0	0	0	0
Miscellaneous Processes	2,000	<del>20,800</del> <u>20,960</u>	<del>1,200</del> <u>1,320</u>	<del>200</del> <u>180</u>	<del>24,000</del> <u>24,340</u>	<del>7,000</del> <u>5,600</u>
<b>Total Area Sources</b>	<b><del>6,000</del> <u>5,700</u></b>	<b><del>20,800</del> <u>20,960</u></b>	<b><del>1,200</del> <u>1,320</u></b>	<b><del>200</del> <u>180</u></b>	<b><del>24,000</del> <u>24,340</u></b>	<b><del>7,000</del> <u>5,600</u></b>
<b>Mobile Sources</b>						
Other Mobile Sources	<del>5,200</del> <u>2,600</u>	<del>24,100</del> <u>15,620</u>	<del>11,600</del> <u>9,260</u>	<del>400</del> <u>20</u>	<del>800</del> <u>520</u>	<del>800</del> <u>460</u>
On-Road Motor Vehicles	<del>5,200</del> <u>5,020</u>	<del>50,300</del> <u>42,980</u>	<del>8,800</del> <u>18,420</u>	<del>0</del> <u>40</u>	<del>200</del> <u>740</u>	<del>200</del> <u>600</u>
<b>Total Mobile Sources</b>	<b><del>10,400</del> <u>7,620</u></b>	<b><del>74,400</del> <u>58,600</u></b>	<b><del>20,400</del> <u>27,680</u></b>	<b><del>400</del> <u>60</u></b>	<b><del>1,000</del> <u>1,240</u></b>	<b><del>1,000</del> <u>1,060</u></b>
<b>Total All Sources</b>	<b><del>24,000</del> <u>20,180</u></b>	<b><del>98,800</del> <u>82,320</u></b>	<b><del>31,800</del> <u>36,360</u></b>	<b><del>800</del> <u>280</u></b>	<b><del>28,600</del> <u>28,780</u></b>	<b><del>10,000</del> <u>8,380</u></b>
Source: CARB, 2006b. <a href="http://www.arb.ca.gov/app/emsinv/emssumcat.php">http://www.arb.ca.gov/app/emsinv/emssumcat.php</a>						
Note: Original CARB data are in tons per day. Values in the table have been converted to lbs/day and rounded. Total may not result from the addition of the individual elements due to rounding.						

Page 4.9-16, Table 4.9-8 and 4.9-9 are revised as follows:

**Revised Table 4.9-8**  
**Summary of 2005 ~~2008~~ Estimated Annual Average Emissions in Placer County**  
**(lbs/day)**

Source	ROG	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Stationary Sources</b>						
Fuel Combustion	800 <u>860</u>	3,900 4,140	6,100 6,480	100 <u>140</u>	400 <u>680</u>	400 <u>640</u>
Waste Disposal	200	0	0	0	0	0
Cleaning and Surface Coatings	<del>5,500</del> <u>3,340</u>	0	0	0	0	0
Petroleum Production and Marketing	<del>2,100</del> <u>1,440</u>	0	0	0	0	0
Industrial Processes	<del>3,000</del> <u>3,300</u>	500	300 <u>280</u>	100 <u>80</u>	<del>3,000</del> <u>3,200</u>	<del>1,600</del> <u>1,740</u>
<b>Total Stationary Sources</b>	<b><del>11,600</del> <u>9,140</u></b>	<b><del>4,400</del> <u>4,660</u></b>	<b><del>6,400</del> <u>6,760</u></b>	<b><del>200</del> <u>200</u></b>	<b><del>3,400</del> <u>3,900</u></b>	<b><del>2,000</del> <u>2,400</u></b>
<b>Area Sources</b>						
Solvent Evaporation	<del>6,600</del> <u>6,560</u>	0	0	0	0	0
Miscellaneous Processes	<del>7,000</del> <u>7,140</u>	<del>93,200</del> <u>94,680</u>	<del>2,200</del> <u>2,180</u>	<del>400</del> <u>320</u>	<del>44,400</del> <u>46,200</u>	<del>16,600</del> <u>14,480</u>
<b>Total Area Sources</b>	<b><del>13,600</del> <u>13,700</u></b>	<b><del>93,200</del> <u>94,680</u></b>	<b><del>2,200</del> <u>2,180</u></b>	<b><del>400</del> <u>320</u></b>	<b><del>44,400</del> <u>46,200</u></b>	<b><del>16,600</del> <u>14,480</u></b>
<b>Mobile Sources</b>						
Other Mobile Sources	<del>11,700</del> <u>16,320</u>	<del>8,7600</del> <u>93,440</u>	<del>27,400</del> <u>17,480</u>	<del>1,300</del> <u>80</u>	<del>1,700</del> <u>1,220</u>	<del>1,400</del> <u>1,040</u>
On-Road Motor Vehicles	<del>16,100</del> <u>11,820</u>	<del>153,700</del> <u>108,940</u>	<del>24,400</del> <u>35,420</u>	<del>2,00</del> <u>120</u>	<del>800</del> <u>1,640</u>	<del>600</del> <u>1,240</u>
<b>Total Mobile Sources</b>	<b><del>27,800</del> <u>28,140</u></b>	<b><del>241,300</del> <u>202,360</u></b>	<b><del>51,800</del> <u>52,900</u></b>	<b><del>1,500</del> <u>200</u></b>	<b><del>2,500</del> <u>2,880</u></b>	<b><del>2,000</del> <u>2,280</u></b>
<b>Total All Sources</b>	<b><del>53,000</del> <u>50,960</u></b>	<b><del>338,900</del> <u>301,700</u></b>	<b><del>60,200</del> <u>61,840</u></b>	<b><del>2,100</del> <u>720</u></b>	<b><del>50,400</del> <u>52,960</u></b>	<b><del>20,800</del> <u>19,160</u></b>
Source: <a href="http://www.arb.ca.gov/app/emsinv/emseic1_query.php">http://www.arb.ca.gov/app/emsinv/emseic1_query.php</a> <a href="http://www.arb.ca.gov/app/emsinv/emssumcat.php">http://www.arb.ca.gov/app/emsinv/emssumcat.php</a>						
Note: Original CARB data are in tons per day. Values in the table have been converted to lbs/day and rounded. Total may not result from the addition of the individual elements due to rounding.						

**Revised Table 4.9-9  
Summary of 2005~~2008~~ Estimated Annual Average Emissions in Sacramento  
County (lbs/day)**

Source	ROG	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Stationary Sources</b>						
Fuel Combustion	700	6600 7,460	6,900 7,240	100 140	1,000 840	1,000 820
Waste Disposal	500 680	200 100	100	0	0 920	0 920
Cleaning and Surface Coatings	11,000 7,980	0	0	0	0	0
Petroleum Production and Marketing	8,500 4,980	0 920	0	0	0	0
Industrial Processes	2,200 1,820	600 40	400 460	100 140	2,200 2,140	1,200 940
<b>Total Stationary Sources</b>	<b>22,900 16,140</b>	<b>7,400 8,120</b>	<b>7,400 7,800</b>	<b>200 280</b>	<b>3,200 3,000</b>	<b>1,200 1,800</b>
<b>Area Sources</b>						
Solvent Evaporation	27,600 26,460	0	0	0	0 20	0 20
Miscellaneous Processes	8,200 8,080	79,600 80,520	6,200	200 240	76,600 78,740	24,000 20,240
<b>Total Area Sources</b>	<b>35,800 34,540</b>	<b>79,600 80,520</b>	<b>6,200</b>	<b>200 240</b>	<b>76,600 78,740</b>	<b>24,000 20,240</b>
<b>Mobile Sources</b>						
Other Mobile Sources	21,600 25,880	183,400 172,020	53,000 49,820	1,300 380	3,600 3,020	3,200 2,680
On-Road Motor Vehicles	54,600 45,380	511,200 418,640	103,600 88,120	1,000 360	3,600 4,080	2,400 2,900
<b>Total Mobile Sources</b>	<b>76,200 71,260</b>	<b>694,600 590,660</b>	<b>156,600 137,960</b>	<b>2,300 740</b>	<b>7,200 7,100</b>	<b>5,600 5,580</b>
<b>Total All Sources</b>	<b>134,800 121,940</b>	<b>781,600 679,300</b>	<b>170,200 151,940</b>	<b>2,700 1,260</b>	<b>87,000 88,860</b>	<b>31,800 27,620</b>
Source: CARB, 2006 <a href="http://www.arb.ca.gov/app/emsinv/emssumcat.php">http://www.arb.ca.gov/app/emsinv/emssumcat.php</a>						
Note: Original CARB data are in tons per day. Values in the table have been converted to lbs/day and rounded. Total may not result from the addition of the individual elements due to rounding.						

Page 4.9-20, Table 4.9-12 is revised as follows:

**Revised Table 4.9-12  
VMT and Criteria Pollutant Emissions for No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	2,634 8,900	52,346 68,320	18,531 9,880	1,869 1,440	1,207	175 160	9,458
Notes:								
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.								
2. Pollutant emissions are calculated using CARB's EMFAC2007 model and project-specific VMT data. 3. Although the model does not calculate PM <sub>2.5</sub> emissions, to ensure a conservative approach PM <sub>2.5</sub> emissions can be assumed to be the same as PM <sub>10</sub> for the purposes of the analysis.								

Page 4.9-21, Tables 4.9-13 and 4.9-14 are revised as follows:

**Revised Table 4.9-13  
VMT and Criteria Pollutant Emissions for Alternative 1 and the  
No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> 8,900	<u>52,346</u> 68,320	<u>18,531</u> 9,880	<u>1,869</u> 4,440	<u>1,207</u>	<u>175</u> 460	<u>9,458</u>
Alternative 1	17,846,974	<u>2,660</u> 8,960	<u>52,714</u> 68,640	<u>18,696</u> 9,940	<u>1,884</u> 4,440	<u>1,218</u>	<u>177</u> 480	<u>9,535</u>

Notes:  
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
2. Pollutants are calculated using CARB's EMFAC2007 model and project-specific VMT data.

**Revised Table 4.9-14  
Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 1  
and the No-Build Alternative in 2020**

Description	VMT Increase (%)	ROG	Emissions Increase Over No-Build Alternative (%)					
			CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Alternative 1	0.68	<u>0.9867</u>	<u>0.7047</u>	<u>0.8964</u>	<u>0.8200</u>	<u>0.89</u>	<u>0.87</u> 12.50	<u>0.81</u>

Notes:  
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
2. Pollutants are calculated using CARB's EMFAC2007<sub>2</sub> model and project-specific VMT data.

Page 4.9-21, the second bullet after Table 4.9-14, is revised as follows:

- Increase emissions by less than 1 percent., except for SO<sub>x</sub>. All other alternatives would have similar increases..

Page 4.9-21, Table 4.9-15 is revised as follows:

**Revised Table 4.9-15  
VMT and Criteria Pollutant Emissions for Alternative 2 and  
the No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/year)
No-Build Alternative	17,725,900	<u>2,634</u> 8,900	<u>52,346</u> 68,320	<u>18,531</u> 9,880	<u>1,869</u> 4,440	<u>1,207</u>	<u>175</u> 460	<u>9,458</u>
Alternative 2	17,875,272	<u>2,667</u> 8,960	<u>52,814</u> 68,740	<u>18,735</u> 9,960	<u>1,888</u> 4,460	<u>1,221</u>	<u>1,778</u> 480	<u>9,554</u>

Notes:  
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
2. Pollutants are calculated using the Burden option in CARB's EMFAC2007<sub>2</sub> model and project-specific VMT data.

Page 4.9-22, Table 4.9-16 is revised as follows:

**Revised Table 4.9-16  
Percentage Change in VMT and Criteria Pollutant Emissions  
Between Alternative 2 and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Alternative 2	0.84	<u>1.26</u> 0.67	<u>0.89</u> 0.64	<u>1.10</u> 0.84	<u>1.03</u> 1.39	<u>1.4</u>	<u>1.12</u> 12.50	<u>1.06</u>

Notes:  
 1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
 2. Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

Page 4.9-22, the second bullet following Table 4.9-16 is revised as follows:

- Increase emissions by ~~less approximately than~~ 1 percent, ~~except for PM<sub>10</sub> and SO<sub>x</sub>~~. All remaining ~~other~~ alternatives would have similar increases.

Page 4.9-22, Tables 4.9-17 and 4.9-18 are revised as follows:

**Revised Table 4.9-17  
VMT and Criteria Pollutant Emissions for Alternative 3 and the No-Build  
Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> 8,900	<u>52,346</u> 68,320	<u>18,531</u> 9,880	<u>1,869</u> 1,440	<u>1,207</u>	<u>175</u> 160	<u>9,458</u>
Alternative 3	17,888,226	<u>2,669</u> 8,980	<u>52,840</u> 68,780	<u>18,747</u> 9,960	<u>1,889</u> 1,460	<u>1,222</u>	<u>177</u> 180	<u>9,560</u>

Notes:  
 1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
 2. Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

**Revised Table 4.9-18  
Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 3  
and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Alternative 3	0.92	<u>1.30</u> 0.90	<u>0.94</u> 0.67	<u>1.17</u> 0.81	<u>1.09</u> 1.39	<u>1.19</u>	<u>1.13</u> 12.5	<u>1.08</u>

Notes:  
 1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
 2. Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

Page 4.9-23, the second bullet is revised as follows:

- Increase emissions by approximately less than 1 percent, except for PM<sub>10</sub> and SO<sub>x</sub>. All other Alternatives 4 and 5 would have similar increases.

Page 4.9-23, Tables 4.9-19 and 4.9-20 are revised as follows:

**Revised Table 4.9-19  
VMT and Criteria Pollutant Emissions for Alternative 4  
and the No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> <del>8,900</del>	<u>52,346</u> <del>68,320</del>	<u>18,531</u> <del>9,880</del>	<u>1,869</u> <del>1,440</del>	<u>1,207</u>	<u>175</u> <del>160</del>	<u>9,458</u>
Alternative 4	17,871,573	<u>2,663</u> <del>8,960</del>	<u>52,768</u> <del>68,720</del>	<u>18,720</u> <del>9,960</del>	<u>1,887</u> <del>1,460</del>	<u>1,220</u>	<u>177</u> <del>180</del>	<u>9,545</u>

Notes:

1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
2. Pollutants are calculated using the Burden option in CARB's EMFAC2007<sub>2</sub> model and project-specific VMT data.

**Revised Table 4.9-20  
Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 4  
and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
Alternative 4	0.82	<u>1.07</u> <del>0.67</del>	<u>0.80</u> <del>0.59</del>	<u>1.02</u> <del>0.81</del>	<u>0.95</u> <del>1.39</del>	<u>1.07</u>	<u>0.95</u> <del>12.50</del>	<u>0.93</u>

Notes:

1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
2. Pollutants are calculated using the Burden option in CARB's EMFAC2007<sub>2</sub> model and project-specific VMT data.

Page 4.9-23, the second bullet after Table 4.9-20 is revised as follows:

- Increase emissions by approximately less than 1 percent, except for PM<sub>10</sub> and SO<sub>x</sub>. All other Alternatives 4 and 5 would have similar increases.

Page 4.9-24, Tables 4.9-21 and 4.9-22 are revised as follows:

**Revised Table 4.9-21  
VMT and Criteria Pollutant Emissions for Alternative 5 and  
the No-Build Alternative in 2020**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> 8,900	<u>52,346</u> 68,320	<u>18,531</u> 9,880	<u>1,869</u> 1,440	<u>1,207</u>	<u>175</u> 60	<u>9,458</u>
Alternative 5	17,874,270	<u>2,664</u> 8,960	<u>52,789</u> 68,720	<u>18,723</u> 9,940	<u>1,887</u> 1,460	<u>1,220</u>	<u>177</u> 180	<u>9,548</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

**Revised Table 4.9-22  
Percentage Change in VMT and Criteria Pollutant Emissions Between Alternative 5  
and the No-Build Alternative in 2020**

Description	VMT Increase (%)	Emissions Increase Over No-Build Alternative (%)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
<del>Build</del> Alternative 5	0.84	<u>1.13</u> 0.67	<u>0.85</u> 0.59	<u>1.04</u> 0.64	<u>0.97</u> 1.39	<u>1.05</u>	<u>0.98</u> 12.50	<u>0.96</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

Page 4.9-24, the second bullet after Table 4.9-22 is revised as follows:

- Increase emissions by approximately less than 1 percent, ~~except for PM<sub>10</sub> and SO<sub>x</sub>. All other alternatives would have similar increases.~~



Page 4.9-25, Table 4.9-23 is revised as follows:

**Revised Table 4.9-23  
Comparison of VMT and Operational Emissions for Build Alternatives in 2020**

Description	VMT	Emissions (lbs/day)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub> (tons/day)
No-Build Alternative	17,725,900	<u>2,634</u> <del>8,900</del>	<u>52,346</u> <del>68,320</del>	<u>18,531</u> <del>9,880</del>	<u>1,869</u> <del>1,440</del>	<u>1,207</u>	<u>175</u> <del>160</del>	<u>9,458</u>
<b>Total Emissions Increase Over No-Build Alternative (lbs/day)</b>								
Alternative 1	17,846,974	<u>2660</u>	<u>367320</u>	<u>16560</u>	<u>150</u>	<u>11</u>	<u>220</u>	<u>77</u>
Alternative 2	17,875,272	<u>3360</u>	<u>467420</u>	<u>20480</u>	<u>1920</u>	<u>14</u>	<u>220</u>	<u>97</u>
Alternative 3	17,888,224	<u>3480</u>	<u>494460</u>	<u>21680</u>	<u>20</u>	<u>14</u>	<u>220</u>	<u>102</u>
Alternative 4	17,871,573	<u>2860</u>	<u>421400</u>	<u>18980</u>	<u>1820</u>	<u>12</u>	<u>220</u>	<u>88</u>
Alternative 5	17,874,270	<u>3060</u>	<u>442400</u>	<u>19260</u>	<u>1820</u>	<u>13</u>	<u>220</u>	<u>91</u>
<b>FRAQMD Significance Thresholds</b>		<b>25</b>	<b>None</b>	<b>25</b>	<b>80</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>PCAPCD Significance Thresholds</b>		<b>82</b>	<b>550</b>	<b>82</b>	<b>82</b>	<b>None</b>	<b>136</b>	<b>None</b>
Note:								
1. The net increase in emissions is calculated based on the comparison with the No-Build Alternative.								

Page 4.9-25, first paragraph is revised as follows:

All build alternatives exceed the FRAQMD significance thresholds for ROG and NO<sub>x</sub>. ~~Only NO<sub>x</sub> would None of the build alternatives exceed the PCAPCD significance thresholds for all build alternatives for any pollutants.~~ As shown in Table 4.9-23, Alternative 1 and Alternative 3 would generate the least and most amount of pollutants, respectively. Hence, the implementation of Alternative 1 can be considered to have fewer air quality impacts compared with the other four build alternatives. Conversely, implementation of Alternative 3 would generate the most air pollutants and potentially create the greatest air quality impacts. However, a comparison shows that most increases in criteria pollutants between Alternative 3 and the No-Build Alternative can be considered negligible. The incremental increase is approximately ~~1.309~~ percent for ROG, 0.947 percent for CO, ~~1.1709~~ percent for NO<sub>x</sub>, ~~1.093~~ percent for PM<sub>10</sub>, ~~1.19~~ percent for PM<sub>2.5</sub>, and 12.5 percent for SO<sub>x</sub>. The incremental increase, in percentage, is quantified by dividing the amount increased by the total amount generated in the No-Build alternative. Incremental increases, in percentages, for other build alternatives will either be lower than or the same as Alternative 3. ~~Although SO<sub>x</sub> shows the highest increase, it should be noted that the amount of sulfur emitted correlates to the amount of sulfur in the fuel (i.e., a reduction in sulfur content in fuel will result in a lower amount of sulfur emitted). Within California, ultra low sulfur fuel (i.e., 15 ppm sulfur content) has been available for on road vehicles since September 1, 2006. Therefore, sulfur emissions from vehicles are expected to be substantially lower in the future.~~

Page 4.9-26, the last sentence of the second paragraph under Mobile Air Toxics is revised as follows:

If this buffer is maintained at the specified distances, it could ~~will~~ provide the minimum 500-foot separation of the roadway identified in some guidance documents.

Page 4.9-29, the fifth sentence of the first paragraph of Operational Impacts through the second paragraph is revised as follows:

VMT data estimated for the Parkway using traffic data for the No-Build Alternative and build alternatives were used as input parameters into the EMFAC2007~~2~~ model. Currently, an accurate method to quantify the magnitude of CO<sub>2</sub> emissions from vehicle exhausts does not exist because of all the different additives in fuel (e.g., ethanol, methyl tertiary-butyl ether, and feedstock). The additives affect the oxidation capability of carbon in fuel during combustion and there is not a complete conversion of all carbon to CO<sub>2</sub> (OTAQ, 2005). Because the EMFAC2007~~2~~ model only provides CO<sub>2</sub> data, it was assumed that all fuel carbon would oxidize during combustion and convert to CO<sub>2</sub> emissions from vehicles, and that these are directly converted to GHG. This is a conservative approach and results in an overestimate of GHG because not all of the fuel carbon would be converted.

CO<sub>2</sub> emissions were quantified using the EMFAC2007~~2~~ model with VMT for the No-Build Alternative and build alternatives ~~as model input~~. Compared to the No-Build Alternative, CO<sub>2</sub> emissions would increase by a maximum of 1.1~~37~~ percent in the 2020 and 2.0~~2~~ percent in 2040. This increase does not account for emissions reduced due to the decrease in travel time, faster traveling speed, and less congested roadways (i.e., VHD) related to project implementation.

Page 4.9-30, the following text is added at the end of Section 4.9.3.7:

## **2008 Update to Greenhouse Gases**

### **Regulatory Background**

California's major initiatives for reducing climate change or greenhouse gas (GHG) emissions were summarized in the Draft Tier 1 EIS/EIR. These include Assembly Bill (AB) 32 (signed into law 2006) and a 2005 Executive Order (S-03-05). These efforts aim at reducing GHG emissions to 1990 levels by 2020. This represents a reduction of about 25 percent, and with an 80 percent reduction below 1990 levels being required by 2050. The main strategies for making these reductions are outlined in a document produced by the California Air Resources Board (CARB) called the Scoping Plan.

This section summarizes additional laws and implementation measures since the Draft Tier 1 EIS/EIR was distributed for public review, to provide additional background on the issue of GHG emissions and actions to reduce GHG emissions. This information is focused on the transportation-related aspects as relevant to Placer Parkway; other aspects of these laws, policies, guidance documents and regulations are not discussed.

### **Senate Bill 97**

Senate Bill (SB) 97 became effective on January 1, 2008, and requires the Office of Planning and Research to prepare CEQA guidelines for the mitigation of GHG emissions

or the effects of GHG emissions by July 1, 2009, and the Resources Agency to adopt the guidelines on or before January 2010.

### **Senate Bill 375**

On September 30, 2008, Governor Schwarzenegger signed into law SB 375, which requires additional coordination between transportation planning and land use planning. SB 375 directs CARB to develop regional greenhouse gas emission reduction targets to be achieved from the automobile and light truck sectors for 2020 and 2035. CARB will also work with California's eighteen metropolitan planning organizations to align their regional transportation, housing and land-use plans and prepare a "sustainable communities strategy" to reduce the amount of vehicle miles traveled in their respective regions and demonstrate the region's ability to attain its greenhouse gas reduction targets (CARB, 2008a).

### **Scoping Plans**

CARB is the lead agency for implementing AB 32, which set the major milestones for establishing the program. AB 32 requires the CARB to prepare a Scoping Plan containing the main strategies that will be used to achieve reductions in GHG emissions in California. On June 26, 2008 CARB staff presented the initial draft of the AB 32 Scoping Plan to its Board for review. The Scoping Plan to be presented to the CARB for adoption in December 2008 has now been released (October 2008).

Relative to transportation, the Scoping Plan includes nine measures or recommended actions. Several of these are related to vehicle GHG, fuel, and efficiency measures and would be implemented statewide rather than on a project by project basis. The one recommended action relevant to Placer Parkway is measure T-3, Regional Transportation-Related Greenhouse Gas Targets. This measure relies on SB 375 implementation to reduce GHG emissions from passenger vehicles. SB 375 references the regional "blueprint" process to prepare land use allocations in the regional transportation plan, as a process to build upon in developing the sustainable communities strategy required by SB 375.

The measures in the Scoping Plan, once approved by the CARB, will be developed into regulations, with more detail and specific mechanisms, over the next two years. Measures will be developed and adopted through the normal rulemaking process, and will be in place by 2012. Under SB 375, the regional GHG emission reduction targets are to be in place by September 30, 2010, with a draft due to each region no later than June 30, 2010.

### **CEQA Thresholds for GHG Impacts**

At the time the Draft Tier 1 EIS/EIR was distributed, there was no statewide, or even regionally adopted threshold for determining the significance of GHG emissions from a project. This has not changed and no new threshold is included here.

Several threshold identification efforts are underway by various agencies, in addition to the Office of Planning and Research effort to comply with SB 97. At the time of publication of this Recirculated document, no regional or statewide threshold has been adopted.

CARB has developed a Preliminary Draft Staff Proposal Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act, October 24, 2008. This preliminary threshold addresses industrial and residential/commercial projects; a preliminary threshold for transportation projects is not available at this time. The preliminary threshold describes the CARB staff belief that zero thresholds are not mandated, but that “any non-zero threshold must be stringent enough to make substantial contributions to reducing the State’s GHG emissions peak” (CARB, 2008b, page 4) and to contribute to meeting interim and long-term emissions reductions targets.

To assist lead agencies with evaluating the significance of GHG emissions, the California Air Pollution Control Officer’s Association prepared a “white paper” reviewing policy choices, analytical tools, and mitigation strategies (CAPCOA, 2008). This paper considers the application of potential thresholds and offers three alternative programmatic approaches towards determining whether greenhouse gas emissions are significant.

### **Local Air Districts**

The proposed project lies within both the Placer County Air Pollution Control District (PCAPCD) and the Feather River Air Quality Management District (FRAQMD). The PCAPCD is currently developing its own climate change guidelines, which are expected within the next year. The FRAQMD does not currently have climate change guidelines.

### **Climate Change/Greenhouse Gases Impacts**

The Draft Tier 1 EIS/EIR included a preliminary quantification of GHG operational impacts of the project (see page 4.9-29 and the Air Quality Technical Memorandum, pages 6-6 – 6-7 and 7-8. As explained in the Draft Tier 1 EIS/EIR, due to the Tier 1 nature of available information, only limited data was available. The analysis represents an overestimate of GHG emissions due to several factors, including the fact that information was not available to calculate the emissions reductions due to the decrease in travel time, faster traveling speed, and less congested roadways (reduction in vehicle hours traveled) with the project. The Draft Tier 1 EIS/EIR evaluated project impacts based on an assessment of the project’s compliance with applicable regional planning and air quality policies. Placer Parkway is included in the Regional Transportation Plan, and that plan has been determined to conform with the State Implementation Plan for Clean Air Act conformity.

The impact analysis is not being updated as part of this document because the document is still at a Tier 1 level of detail and no additional information is available that would change the prior calculations. Further calculations will be conducted in the Tier 2 analysis.

### **The Proposed Project and Regional Planning**

The Sacramento Area Council of Governments (SACOG) has developed the Sacramento Region Blueprint Project, which is a planning tool to predict how current land use decisions will affect the development of Sacramento area communities by the year 2050. It is also a vision for growth that promotes compact, mixed-use development and more transit choices as an alternative to low density development.

The Blueprint Project involved numerous public workshops with local government staff and elected officials to produce two development projections: a Base Case and a Preferred

Blueprint Scenario. The Base Case is a projection of what the Sacramento area would look like in 2050 if current land use plans and decisions were carried out. The Preferred Blueprint Scenario depicts a way for the region to grow using “smart growth” principles, which include compact development, mixed-use development, and a variety of transportation choices. These methods of development would all serve to decrease the amount of automobile travel, alleviating congestion and decreasing emissions. The transportation sector is by far the biggest contributor to greenhouse gas emissions in the state.

The Preferred Blueprint Scenario is part of SACOG’s Metropolitan Transportation Plan for 2035, the long-range transportation plan for the six-county region. It also serves as a framework to guide local government in growth and transportation planning through 2050. The Preferred scenario included transportation projects that would still fit in with the “smart growth” vision of the Blueprint Project. The Placer Parkway project is included in this Preferred Scenario.

It would be speculative at this point to make assumptions about the regional GHG targets to be set in accordance with SB 375. But, given SB 375’s reference to the blueprint planning process, an emphasis that is continued in the Scoping Plan, it is expected that the targets and sustainable community strategy for the region would either rely on, or build upon the SACOG Preferred Blueprint Scenario. The Preferred Scenario incorporates smart growth and energy efficient community principles, and the proposed project is included in this Preferred Scenario. Therefore, the Parkway project is expected to be consistent with regional plans and policies designed to accommodate population growth in a carbon efficient way, as stated in the Scoping Plan on page C-75.

Page 4.9-31, Table 4.9-24 is revised as follows:

**Revised Table 4.9-24  
VMT and Criteria Pollutant Emissions for No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> 6,060	<u>44,222</u> 44,260	<u>12,169</u> 4,960	<u>2,474</u> 2,100	<u>1,528</u>	<u>261</u> 240	<u>14,061</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutant emissions are calculated using CARB’s EMFAC2002<sub>7</sub> model and project-specific VMT data.
- Although the model does not calculate PM<sub>2.5</sub> emissions, to ensure a conservative approach PM<sub>2.5</sub> emissions can be assumed to be the same as PM<sub>10</sub> for the purposes of the analysis.

Page 4.9-32, Table 4.9-25 and the bullets following the table are revised as follows:

**Revised Table 4.9-25  
VMT and Criteria Pollutant Emissions for Alternative 1 and the  
No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 1	17,846,974	<u>2,599</u> <del>6,160</del>	<u>45,038</u> <del>44,680</del>	<u>12,365</u> <del>5,040</del>	<u>2,515</u> <del>2,120</del>	<u>1,553</u>	<u>266</u> <del>260</del>	<u>14,299</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using CARB's EMFAC2007~~2~~ model and project-specific VMT data.

- Increase VMT by 1.7 percent
- Increase ROG by 2.31~~7~~ percent
- Increase CO by 1.90 percent
- Increase NO<sub>x</sub> by 1.6 percent
- Increase PM<sub>10</sub> by 1.70 percent
- Increase PM<sub>2.5</sub> by 1.7 percent
- Increase SO<sub>x</sub> by 1.98~~3~~ percent

Page 4.9-32, Table 4.9-26 and the bullets following the table are revised as follows:

**Revised Table 4.9-26  
VMT and Criteria Pollutant Emissions for Alternative 2 and  
the No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/year)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 2	<u>26,569,226</u> <del>26,477,729</del>	<u>2,609</u> <del>6,180</del>	<u>45,156</u> <del>44,740</del>	<u>12,394</u> <del>5,060</del>	<u>2,521</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,336</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using ~~the Burden option in~~ CARB's EMFAC2007~~2~~ model and project-specific VMT data.

- Increase VMT by 1.9 percent
- Increase ROG by 2.6 percent
- Increase CO by 2.14~~4~~ percent
- Increase NO<sub>x</sub> by 1.92 percent
- Increase PM<sub>10</sub> by 1.90 percent
- Increase PM<sub>2.5</sub> by 1.9 percent
- Increase SO<sub>x</sub> by 2.18~~3~~ percent

Page 4.9-33, Table 4.9-27 and the bullets following the table are revised as follows:

**Revised Table 4.9-27  
VMT and Criteria Pollutant Emissions for Alternative 3 and the No-Build  
Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 3	<u>26,548,787</u> <del>26,488,169</del>	<u>2,608</u> <del>6,180</del>	<u>45,165</u> <del>44,760</del>	<u>12,396</u> <del>5,060</del>	<u>2,522</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,338</u>

Notes:  
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
2. Pollutants are calculated using the Burden option in CARB's EMFAC2002~~7~~ model and project-specific VMT data.

- Increase VMT by 1.9 percent
- Increase ROG by 2.6 percent
- Increase CO by 2.144 percent
- Increase NO<sub>x</sub> by 1.92 percent
- Increase PM<sub>10</sub> by 1.90 percent
- Increase PM<sub>2.5</sub> by 1.9 percent
- Increase SO<sub>x</sub> by 2.283 percent

Page 4.9-33, Table 4.9-28 and the bullets following the table are revised as follows:

**Revised Table 4.9-28  
VMT and Criteria Pollutant Emissions for Alternative 4  
and the No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 4	<u>26,546,653</u> <del>26,482,450</del>	<u>2,610</u> <del>6,180</del>	<u>45,160</u> <del>44,760</del>	<u>12,399</u> <del>5,060</del>	<u>2,522</u> <del>2,120</del>	<u>1,558</u>	<u>267</u> <del>260</del>	<u>14,342</u>

Notes:  
1. VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.  
2. Pollutants are calculated using ~~the Burden option in~~ CARB's EMFAC200~~2~~2 model and project-specific VMT data.

- Increase VMT by 1.9 percent
- Increase ROG by 2.7 percent
- Increase CO by 2.144 percent
- Increase NO<sub>x</sub> by 1.92 percent
- Increase PM<sub>10</sub> by 2.040 percent
- Increase PM<sub>2.5</sub> by 2.0 percent
- Increase SO<sub>x</sub> by 28.3 percent

Page 4.9-34, Table 4.9-29 and the bullets following it are revised as follows:

**Revised Table 4.9-29  
VMT and Criteria Pollutant Emissions for Alternative 5 and  
the No-Build Alternative in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 5	<u>26,533,413</u> <del>26,461,066</del>	<u>2,608</u> <del>6,180</del>	<u>45,129</u> <del>44,720</del>	<u>12,389</u> <del>5,060</del>	<u>2,520</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,331</u>

Notes:

- VMT data are from the Placer Parkway VMT – 5mph Spds Bin – (values).xls, March 21, 2007, prepared by DKS Associates for this project.
- Pollutants are calculated using the Burden option in CARB's EMFAC2007~~2~~ model and project-specific VMT data.

- Increase VMT by 1.8 percent
- Increase ROG by 2.60 percent
- Increase CO by 2.14 percent
- Increase NO<sub>x</sub> by 1.82 percent
- Increase PM<sub>10</sub> by 1.90 percent
- Increase PM<sub>2.5</sub> by 1.9 percent
- Increase SO<sub>x</sub> by 2.28 percent

Page 4.9-34, Table 4.9-30 is revised as follows:

**Revised Table 4.9-30  
Operational Emissions from All Alternatives in 2040**

Description	VMT	ROG (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	CO <sub>2</sub> (tons/day)
No-Build	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,100</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
Alternative 1	26,424,662	<u>2,599</u> <del>6,160</del>	<u>45,038</u> <del>44,680</del>	<u>12,365</u> <del>5,040</del>	<u>2,515</u> <del>2,120</del>	<u>1,553</u>	<u>266</u> <del>260</del>	<u>14,299</u>
Alternative 2	26,477,729	<u>2,609</u> <del>6,180</del>	<u>45,156</u> <del>44,740</del>	<u>12,394</u> <del>5,060</del>	<u>2,521</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,336</u>
Alternative 3	26,488,169	<u>2,608</u> <del>6,180</del>	<u>45,165</u> <del>44,760</del>	<u>12,396</u> <del>5,060</del>	<u>2,522</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,338</u>
Alternative 4	26,482,450	<u>2,610</u> <del>6,180</del>	<u>45,160</u> <del>44,760</del>	<u>12,399</u> <del>5,060</del>	<u>2,522</u> <del>2,120</del>	<u>1,558</u>	<u>267</u> <del>260</del>	<u>14,342</u>
Alternative 5	26,461,066	<u>2,608</u> <del>6,180</del>	<u>45,129</u> <del>44,720</del>	<u>12,389</u> <del>5,060</del>	<u>2,520</u> <del>2,120</del>	<u>1,557</u>	<u>267</u> <del>260</del>	<u>14,331</u>

Note: 1. Vehicle emissions are calculated using EMFAC2007~~2~~ mobile emission factor and methodology prescribed by CARB.



Page 4.9-35, first paragraph is revised as follows:

As shown in Table 4.9-30, the alternatives generating the most air pollutants can be associated with the highest VMT. Alternatives are ranked from the least impact on air quality to the most impact, as follows: No-Build Alternative, Alternative 1, Alternative 5, Alternative 2, Alternative 4, and Alternative 3. However, the increase in criteria pollutants between Alternative 3 and the No-Build Alternative in 2040 shows that most increases in criteria pollutants can be considered negligible. The incremental increase is approximately 2 percent for ROG, ~~34~~ percent for CO, 2 percent for NO<sub>x</sub>, ~~24~~ percent for PM<sub>10</sub>, and ~~28.3~~ percent for SO<sub>x</sub>. The incremental increase, in percentage, is quantified by dividing the amount increased by the total amount generated in the No-Build Alternative. Incremental increases, in percentages, for other build alternatives will either be lower than or the same as Alternative 3. ~~Although SO<sub>x</sub> shows the highest increase, it should be noted that the amount of sulfur emitted correlates to the amount of sulfur in the fuel (i.e., a reduction in sulfur content in fuel will result in a lower amount of sulfur emitted). Within California, ultra low sulfur fuel (i.e., 15 ppm sulfur content) has been available for on road vehicles since September 1, 2006. Therefore, sulfur emissions from vehicles are expected to be substantially lower in the future.~~ The increase of daily emissions from all five alternatives in 2040 relative to the No-Build Alternative is provided in Table 4.9-31. The FRAQMD and PCAPCD significance thresholds also are presented in this table to determine whether the operation of the alternatives would create substantial air quality impacts.

Page 4.9-35, Table 4.9-31 and the paragraph following it are revised as follows:

**Revised Table 4.9-31  
Comparison of VMT and Operational Emissions for Build Alternatives in 2040**

Description	VMT	Emissions (lbs/day)						
		ROG	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>	CO <sub>2</sub>
No-Build Alternative	25,983,131	<u>2,542</u> <del>6,060</del>	<u>44,222</u> <del>44,260</del>	<u>12,169</u> <del>4,960</del>	<u>2,474</u> <del>2,400</del>	<u>1,528</u>	<u>261</u> <del>240</del>	<u>14,061</u>
<b>Total Emissions Increase Over No-Build Alternative (lbs/day)</b>								
Alternative 1	26,424,662	<u>57</u> <del>400</del>	<u>816</u> <del>420</del>	<u>196</u> <del>80</del>	<u>41</u> <del>20</del>	<u>25</u>	<u>5</u> <del>20</del>	<u>238</u>
Alternative 2	<u>26,569,226</u> <del>26,477,729</del>	<u>67</u> <del>120</del>	<u>934</u> <del>480</del>	<u>226</u> <del>400</del>	<u>47</u> <del>20</del>	<u>30</u>	<u>6</u> <del>20</del>	<u>275</u>
Alternative 3	<u>26,548,787</u> <del>26,488,169</del>	<u>66</u> <del>120</del>	<u>943</u> <del>500</del>	<u>227</u> <del>400</del>	<u>48</u> <del>20</del>	<u>30</u>	<u>6</u> <del>20</del>	<u>277</u>
Alternative 4	<u>26,546,653</u> <del>26,482,450</del>	<u>68</u> <del>120</del>	<u>938</u> <del>500</del>	<u>230</u> <del>400</del>	<u>49</u> <del>20</del>	<u>31</u>	<u>6</u> <del>20</del>	<u>281</u>
Alternative 5	<u>26,533,413</u> <del>26,461,066</del>	<u>66</u> <del>120</del>	<u>907</u> <del>460</del>	<u>220</u> <del>400</del>	<u>46</u> <del>20</del>	<u>29</u>	<u>6</u> <del>20</del>	<u>269</u>
<b>FRAQMD Significance Thresholds</b>		<b>25</b>	<b>None</b>	<b>25</b>	<b>80</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>PCAPCD Significance Thresholds</b>		<b>82</b>	<b>550</b>	<b>82</b>	<b>82</b>	<b>None</b>	<b>136</b>	<b>None</b>

Note:

1. The net increase in emissions is calculated based on the comparison with the No-Build Alternative.

Under cumulative conditions, incremental emissions associated with all build alternatives relative to the No-Build Alternative would exceed the FRAQMD significance thresholds for ROG and NO<sub>x</sub>. Only CO and NO<sub>x</sub>. All build alternatives would exceed the PCAPCD significance threshold under build alternatives for ROG and NO<sub>x</sub> except for Alternative 1.

Page 4.9-36, the last sub-bullet under Section 4.9.4.1 is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone, including the provision of additional future interchanges which would affect the long-term reliable travel time reductions provided by the Parkway.

Page 4.9-37, the second bullet in Section 4.9.4.3, Tier 2 – Mitigation Commitments, is revised as follows:

If it is not possible to maintain a distance of 500 feet or more between the edge of the Parkway and any sensitive air receptors (see Section 4.9.3.4), then FRAQMD and PCAPCD will be consulted to determine the need for a health risk assessment ~~will be conducted.~~ If a health risk assessment is performed and if risks exceed the accepted standards, mitigation will be implemented as appropriate to reduce risks to an acceptable level, and will include consideration of relocations if necessary.

Page 4.9-37, the last sentence of the third bullet in Section 4.9.4.3, Tier 2 – Mitigation Commitments, is revised as follows:

Since Placer Parkway would likely be constructed within a 500- to 1,000-foot-wide no-development buffer corridor, unless the size of the buffer is adjusted as described in Section 2.2.4.1 at the bottom of page 2-9, any-development projects would likely could be at least 500 feet from the roadway, depending on the location of the roadway within the corridor, in which case ~~and~~ it is possible that no additional assessment would be required.

Page 4.9-38, the second sentence of the second bullet in Section 4.9.5 is revised as follows:

In addition, SMAQMD's protocol, *Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* (2007a), shall be evaluated and recommendations provided for potential siting of sensitive land uses located in close proximity to the Parkway (i.e., less than 500 feet). The FRAQMD and the PCAPCD shall be consulted regarding additional appropriate protocol to use to evaluate the Parkway's health impacts and to determine the level of significance of such effects on nearby sensitive receptors.

Page 4.9-45, the following sentence replaces the second sentence of the text in the second bullet of Section 4.9.5, Tier 1 and Tier 2 Studies:

The FRAQMD and the PCAPCD shall be consulted regarding additional appropriate protocol to use to evaluate the Parkway's adverse health impacts on nearby sensitive receptors.

## Section 4.10 Noise

Page 4.10-39, the second bullet is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone.

## Section 4.11 Hydrology and Floodplains

Page 4.11-29, the last sub-bullet under Tier 1 Avoidance/Minimization Strategies is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone. This ~~w~~ould help to minimize floodplain and hydrological impacts.

## Section 4.12 Water Quality

Page 4.12-20, the last sub-bullet under Tier 1 Avoidance/Minimization Strategies is revised as follows:

The location of the Parkway within a no-development buffer zone (see Section 2.2.4) that, depending on its final width, would preserve open space and agricultural uses adjacent to the Parkway and limit future development in the buffer zone. This ~~w~~ould help to minimize water quality impacts.

Page 4.12-21, the fourth sentence in the second bullet is revised as follows:

LID strategies that integrate BMPs to protect water quality may also reduce runoff~~quality~~.

## Section 4.14 Biology Resources

Page 4.14-28, the first sentence of the last paragraph is revised as follows:

Vernal pool complexes would be directly and indirectly affected as a result of construction of the Parkway, which could adversely affect populations of these special-status species.

Page 4.14-29, the first full sentence is revised as follows:

However, it is unlikely that Conservancy fairy shrimp is present in the vernal pools in the study area because of the extremely sparse distribution of this species throughout its range and the absence of large playa-type pools typical of locations where this species has been documented.

Page 4.14-29, the following paragraph is inserted before the first full paragraph:

Direct impacts of the proposed project would reduce the size of some existing vernal pool complexes that have been identified and mapped by Placer County (see Figure 4.14-2) in

the Draft Tier 1 EIS/EIR). Although the proposed project would not directly affect the vernal pools and uplands outside of the project limits, the proposed project could indirectly affect listed vernal pool branchiopods if they are present in adjacent wetland habitats. Indirect effects could include changes in hydrology, water quality, and barriers to species dispersal due to the reduction in size, quality, and connectivity of the vernal pool habitats to other similar habitats in the project vicinity. Indirect impacts are addressed in more detail in Section 4.14.3.4 (Secondary and Indirect Impacts).

Page 4.14-31, the first sentence of the third paragraph is revised as follows:

Landscaping would be installed within the Parkway's no-development buffer zones, i.e., the portions of the 500- and 1,000-foot-wide corridors not used as part of the roadway cross section, depending on its final width, as well as within the median.

Page 4.14-34, Section 4.14.4.3, the following text is added as the second bullet:

- For project components outside of the area permitted for development under the NBHCP, negotiations with the USFWS will be undertaken to amend the NBHCP or provide such other compensation as would meet the intent of the NBHCP with respect to protection of special-status species in the NBHCP service area.

Page 4.14-34, the following paragraph is added as an additional sub-bullet point under the second bullet point at the end of Section 4.14.4.3:

A site-specific assessment of this impact would be implemented during the Tier 2 evaluation when the actual limits of the proposed project are defined. Where feasible the project will be designed to minimize adverse impacts to the size, quality, or connectivity of adjacent vernal pool complexes by maintaining appropriate setbacks for ground-disturbing impacts, constructing culverts and drainage features for the future roadway to minimize changes to the natural hydrology or degradation of water quality in adjacent wetlands. If indirect effects cannot be substantially avoided or minimized, the project proponent would implement mitigation consistent with the strategies described in Section 4.14.4.4 (Tier 2 – Mitigation Considerations) below.

Page 4.14-36, the following is added as a last bullet in Section 4.14.4.4:

Enter in consultation with USFWS and CDFG to amend the Natomas Basin Habitat Conservation Plan to include the portions of the budget extending west of SR 70/99.

## Section 4.15 Hazardous Materials

Page 4.15-2, Section 4.15.2.2, is revised as follows:

**Western Placer Household Hazardous Waste Collection Facility (HHWCF), Athens Road at Fiddymont, Lincoln, California.** This facility, also referred to as the Western Place Waste Management Authority (WPWMA) Permanent Household Hazardous Waste (HHW) facility, is co-located with ~~the~~ commonly known as the Materials Recycling Facility, and is located in the Western Segment of the study area, ~~co-located~~ with adjacent to the Western Regional Sanitary Landfill (WRSL) (Figure 4.15-1). The facility was listed in the state HazNet database as having generated nine shipments of household waste. The HHWCF facility is a Permit by Rule facility approved to receive and store hazardous waste from the public, some businesses, and the MRF for offsite treatment or

~~disposal. No further information is available. According to the California Integrated Waste Management Board website, the WRSL is an active landfill that accepts ash, construction and demolition debris, mixed municipal waste, and sludge/biosolids. The facility was inspected by the local enforcement agency on February 23, 2006, and no violations or areas of concern were noted.~~

Page 4.15-2, the last paragraph is deleted.

Page 4.15-6, a new Section 4.15.2.7 is added; existing sections 4.15.2.7 and 4.15.2.8 become 4.15.2.8 and 4.15.2.9, respectively.

#### **4.15.2.7 Integrated Waste Management Board**

A 280-acre active landfill, the WRSL, is located in the northwestern portion of the Eastern Segment southeast of the Fiddymont Road and Athens Avenue intersection (Figure 4.15-1). The land is owned and operated by the Western Placer Waste Management Authority (WPWMA), a joint powers organization consisting of Placer County and the cities of Lincoln, Roseville, and Rocklin.

According to the California Integrated Waste Management Board website, this landfill accepts ash, construction and demolition debris, mixed municipal waste, and sludge/biosolids. The facility was inspected by the local enforcement agency on February 23, 2006, and no violations or areas of concern were noted.

A groundwater monitoring well network was installed between 1995 and 2000 (with occasional replacement wells installed subsequently), and regular monitoring has been conducted at the WRSL since 1995. The network consists of 25 wells (6 for corrective action monitoring, 18 for detection monitoring, and 1 for water level monitoring only).

A monitoring well immediately west of one of the original unlined modules first showed evidence of groundwater degradation in the fourth quarter of 1995. Several volatile organic compounds (VOCs) were identified as having exceeded their respective tolerance limits, defined in WDR Order No. R5-2002-0218 as either:

- The background value established in the Monitoring and Reporting Program (MRP) for that constituent; or
- The constituent's background value, based on data for each reporting period collected only from the background monitoring points.

The presence of VOCs in the monitoring well was attributed to contamination via the migration of landfill gas (LFG).

A Corrective Action Program and addendum were submitted to the Central Valley Regional Water Quality Control Board (CVRWQCB) and were approved. The initial corrective actions identified were the installation of final cover and the extraction of LFG. Quarterly monitoring of groundwater quality in the six corrective action wells supplemented by trend analysis of results is used to evaluate the effectiveness of the actions.

At the present time, the WRSL is not considered to represent a potential REC to the project, given the lack of violations and regulatory sanctions. The possibility of the

WRS� representing a potential REC will be evaluated further near the time of construction.

## CHAPTER 5 CEQA EVALUATION

Page 5-3, the following new paragraph is added at the end of the page:

Placer Parkway would not conflict with City of Roseville General Plan Circulation Policies 1 or 3, Community Form Policies 3 or 4, or Growth Management Policy 8, as described in Table 4.1-4.

Page 5-6, the first sentence of the second to last paragraph is revised as follows:

The project would convert between ~~1,578,792.46~~ (Alternative ~~54~~) (*4 is deleted; 5 is added*) and ~~1,813,990.06~~ (Alternative ~~32~~) acres of farmland, depending on the alternative selected (see Table 4.4-8).

Page 5-6, the first sentence of the last paragraph is revised as follows:

It is not known at this time if all of the no-development buffer zone adjacent to the Placer Parkway would be viable for farmland, depending on its final width, and because of the potential for parcel splitting or other impacts on particular farm units such as the proximity of remnant parcels to overhead power lines or other constraints to continued farming.

Page 5-18, Section 5.13.1, the following sentence is added after the second sentence in the second to last paragraph:

In addition, vernal pool wetland features adjacent to the project corridor could be indirectly impacted as described in Section 4.14.3.4.

Page 5-22, the first full sentence is revised as follows:

The project includes components that would reduce this impact, such as minimizing the number of interchanges and establishment of a no-development buffer zone, subject to performance standards to be developed in Tier 2, which would make it difficult to construct new interchanges in the future.

Page 5-24, Section 5.18, last paragraph is revised as follows:

As shown on Table 4.4-10 in Section 4.4, Farmlands, it is estimated that other anticipated urban development and roadway projects in the study area would convert ~~5,269~~ ~~5,203~~ acres of Farmland of Statewide Importance, ~~817,429~~ acres of Prime Farmland, ~~2,499,687~~ acres of Unique Farmland, and ~~1,301,250~~ acres of Grazing Land. The converted farmland would also include nearly 717 acres of Williamson Act contracted land within Sutter and Placer counties, as shown in Table 4.4-11 in Section 4.4. Depending on the alternative, the project could impact between ~~1,578,676.46~~ (Alternative ~~5~~) and ~~1,813~~ (Alternative ~~3~~) ~~990.06~~ acres of farmland and between 119.85 and 243.70 acres of Williamson Act contracted land.

Page 5-33, Section 5.19.3, last paragraph is revised as follows:

Several significant unmitigable impacts in the Central Segment differentiate the build alternatives. Alternatives 1, ~~2, 3, 4,~~ and 5 would convert similar amounts of farmland in the Central Segment to transportation uses, ranging from 620 acres (Alternative 1) to 674 acres (Alternative 4)~~672 to 903 acres of farmland to transportation uses, with Alternatives 4 and 5 converting the least (677 and 672 acres, respectively) and Alternative 1 converting the most (903 acres). Alternatives 2 and 3 would convert the most, 820 and 846 acres, respectively.~~ Effects on farmland in the Central Segment by alternative are shown on Table 5-1. Overall, Alternatives 1 ~~and 4~~ would have the least impacts on farmlands in the Central Segment, followed by Alternative 5.

Page 5-33, Table 5-1 is revised as follows:

**Revised Table 5-1  
Important Farmlands Affected in the Central Segment**

Alternative	Type of <del>Important</del> Farmland Affected (acres)						Williamson Act Lands
	<u>Farmland of Local Importance</u>	<u>Farmland of Statewide Importance</u>	<u>Prime Farmland</u>	<u>Unique Farmland</u>	<u>Grazing Land</u>	<u>Total Farmland</u>	
1	<u>379.07</u>	<u>155.71</u> <del>141</del>	<u>5.62</u> <del>132</del>	<u>70.52</u> <del>139</del>	<u>8.61</u>	<u>619.53</u>	0
2	<u>215.67</u>	<u>186.66</u> <del>183</del>	<u>5.69</u> <del>247</del>	<u>399.9</u> <del>462</del>	<u>11.92</u>	<u>819.84</u>	124
3	<u>242.11</u>	<u>183.97</u> <del>192</del>	<u>5.73</u> <del>202</del>	<u>402</u> <del>475</del>	<u>11.96</u>	<u>845.77</u>	121
4	<u>192.32</u>	<u>58.8</u> <del>67</del>	<u>5.79</u> <del>129</del>	<u>414</u> <del>261</del>	<u>3.06</u>	<u>673.97</u>	121
5	<u>75.78</u>	<u>64.05</u> <del>80</del>	<u>6.0</u> <del>135</del>	<u>511</u> <del>360</del>	<u>5.46</u>	<u>662.29</u>	120

Page 5-35, Section 5.15.4, Conclusion, the following sentence is added to the end of the third paragraph:

Alternative 5 would have fewest impacts on farmlands.

Page 5-35, the following sentence is added as a new paragraph following the second paragraph:

In the Western Segment, Alternative 5 is the least archeologically sensitive alternative, followed by Alternative 4.

Page 5-35, third paragraph is revised as follows:

In the Central Segment, Alternative 4 would be preferred over other build alternatives, due to the lesser amount of ~~significant unmitigable impacts on prime farmland and farmland of statewide importance; impacts to potential historic resources;~~ and impacts to biological resources, again with the least impact on vernal pool complexes.

Page 5-35, last paragraph is revised as follows:

Based on this analysis, the No-Build Alternative is the Environmentally Superior Alternative under CEQA, except with respect to traffic, where it is substantially worse than all build alternatives. Among the build alternatives, Alternative ~~4.5~~ *[4 is deleted; 5 is added]* is the Environmentally Superior Alternative under CEQA.

## CHAPTER 6 OTHER IMPACT CONSIDERATIONS

Page 6-3, the first sentence of the last paragraph is revised as follows:

The question of growth inducement has been considered throughout the planning process for Placer Parkway, and concerns related to this issue were addressed through adopted policies aimed at: (1) not allowing access to the roadway in areas designated for agricultural use; (2) creating a 500- to 1,000-foot no-development buffer zone along the Parkway, subject to performance standards to be developed in Tier 2; and (3) using control signage along the corridor. It is acknowledged that there is no mechanism to prohibit access in perpetuity, and that there is development pressure to reduce the size of the buffer in areas undergoing urban development. These pressures would apply equally to all alternatives, and could affect the growth inducement potential of the Parkway.

## CHAPTER 7 POTENTIAL WATT AVENUE INTERCHANGE

Page 7-5, the last sentence of the first paragraph is revised as follows:

Since the planning of the Parkway incorporates design measures to complement rural land uses (e.g., wide buffers, subject to performance standards to be developed in Tier 2), it is expected that the potential Watt Avenue interchange, if planned in conjunction with the Parkway design, would not affect the use of this land as a buffer between rural and urban uses.

## APPENDIX E

Appendix E, Placer Parkway Programmatic Agreement, is removed in its entirety. After consultation with the State Historic Preservation Officer (SHPO), FHWA determined that a Placer Parkway Programmatic Agreement (PA) for this undertaking was not necessary. FHWA withdrew the PA and processed this Tier 1 project through the standard NEPA Section 106 process of the National Historic Preservation Act. FHWA and Caltrans will consult with SHPO further under Tier 2 as an actual corridor is developed and the design alternatives are considered (FHWA, 2007).

## 4.2 PARTIALLY REVISED DRAFT TIER 1 EIS/EIR

Page 27, Section 3.5, last two sentences of fifth paragraph is revised as follows:

On June 26, 2008, CARB staff presented the initial draft of the AB 32 Scoping Plan to its Board for review. The Scoping Plan was approved by the CARB Board in December 2008~~to be presented to the CARB for adoption in December 2008 has now been released (October 2008).~~

Page 27, Section 3.5, third paragraph is revised as follows:



~~Several threshold identification efforts are underway by various agencies~~In addition to the Office of Planning and Research effort to comply with SB 97, several threshold identification efforts by various other agencies are underway. At the time of publication of this ~~R~~recirculated document, no regional or statewide threshold has been adopted.

Page 28, Section 3.5, first sentence of the fourth paragraph is revised as follows:

The proposed project lies within both ~~the Placer County Air Pollution Control District (PCAPCD) and the Feather River Air Quality Management District (FRAQMD).~~

## **APPENDIX G IN THE PARTIALLY REVISED DRAFT TIER 1 EIS/EIR**

Figures G-1, G-5 through G-17, and G-25 through G-27 have been revised. They are provided at the end of this section.

Page G-29, Table G-3 is revised as shown on the following page.

Page G-40, first paragraph, first full sentence, is revised as follows:

The southerly alignment corridors have 75.2~~77.4~~ acres of Potentially Developable Land within a 1-mile radius of the conceptual interchanges.

Page G-40, fourth paragraph, is revised as follows

In summary, with respect to Potentially Developable Land within a 1-mile radius of interchanges proposed in the Draft Tier 1 EIS/EIR, the above analysis shows that Alternatives 1, 2, and 3 have 77.4~~75.2~~ acres of Potentially Developable Land and Alternatives 4 and 5 have no Potentially Developable Land.

Page G-40, sixth paragraph, second and third sentences, are revised as follows:

These include the two optional locations that were examined along the Alternative 1 corridor alignment, in the Draft Tier 1 EIS/EIR. Alternative 1/Option 1 (south) would not affect ~~any~~the smallest amount of Potentially Developable Land (49.4~~acres~~), so it could be considered to have the least growth inducement potential within the 1-mile radius of this particular location. As shown on Table G-3, a Watt Avenue interchange with Alternatives 3 and 4 would encompass the greatest amount of Potentially Developable Land (526.6~~692.3~~ acres) within a 1-mile radius, followed by Alternative 5 (520.3~~670~~ acres) and Alternative 1/Option 2 (north) and Alternative 2 (373.8~~512~~ acres).

Page G-40, last paragraph, fourth sentence, is revised as follows:

As shown on Table G-4 and illustrated on Figure G-13, under this variant Alternative 1/Option 1 (south) would have the largest acreage of Potentially Developable Land (1,018.06.6~~8~~ acres) within a 1-mile radius versus Alternative 1/Option 2 (north) and Alternative 2, which would have the smallest amount (751.4~~879.7~~870.4 acres).

Page G-43, Table G-4 is revised as shown on the attached Revised Table G-4.

Page G-44, add the following sentence to the end of the first (partial) paragraph at the top of the page:

Alternative 5 has the next least amount of developable land (879.7 acres).

**Revised Table G-3  
 Acreages in Land Development Categories within 1 Mile of Interchanges and Corridor Alignment Alternatives  
 (Variant A: Considering Curry Creek Community Plan and SIAP Areas as Existing or Proposed for Development  
 as per the Draft Tier 1 EIS/EIR)**

Area	Existing and Approved Development	Existing Conservation Area	Existing Municipal Facility	Planned/Proposed Development	Developed Unincorporated	100-Year Floodplain (in undeveloped areas only)	Potentially Developable	Total Acres
<b>Eastern Segment: Acres within 1 Mile of Conceptual Interchanges</b>								
Alternatives 1 through 5	4,536.2	149.1	278.3	241.6	-	-	-	5,205.2
<b>Western Segment: Acres within 1 Mile of Conceptual Interchanges</b>								
Alternatives 1, 2, and 3	-	-	-	4,036.5	337.5	310.9	75.2	4,760.1
Alternatives 4 and 5	-	116.5	-	2,544.8	12.1	1,062.4	-	3,735.8
<b>Watt Avenue Interchange: Acres within 1 Mile (interchange is not proposed, but identified for this analysis per agency request)</b>								
Alternative 1 (Option 1 – south)	43.7	11.2	-	<del>1,955.5</del> 1,900.6	-	<del>5.5</del>	<del>49.4</del>	2,010.5
Alternative 1 (Option 2 – north), Alternative 2	266.3	<del>252.23</del>	-	<del>1,110.4</del> 972.0	<del>7.9</del> 8.0	-	<del>373.8</del> 542.0	2,010.5
Alternatives 3 and 4	80.3	<del>175.24</del>	-	<del>1,228.4</del> 1,062.5	-	-	<del>526.6</del> 692.3	2,010.5
Alternative 5	23.5	<del>117.68</del>	-	<del>1,349.0</del> 1,199.4	-	-	<del>520.3</del> 670.0	2,010.5
<b>Brewer Road Interchange: Acres within 1 Mile (interchange is not proposed, but identified for this analysis per agency request)</b>								
Alternative 1	-	-	-	<del>147.8</del> 46.8	<del>434.2</del> 256.3	33.0	<del>1,395.4</del> 1,400.3	2,010.5
Alternative 2	-	114.0	-	<del>128.1</del> 443.0	<del>180.0</del> 185.6	<del>270.3</del> 274.7	<del>1,318.0</del> 1,326.4	2,010.5
Alternatives 3 and 4	-	122.8	-	<del>350.6</del> 329.6	-	<del>329.6</del> 334.0	<del>1,207.4</del> 1,227.0	2,010.5
Alternative 5	-	56.0	-	<del>320.5</del> 299.6	-	<del>401.7</del> 403.0	<del>1,232.2</del> 1,251.9	2,010.5
<b>Eastern Segment Interchange: Acres within 1 Mile (interchange is not proposed, but identified for this analysis per agency request)</b>								
All Alternatives	945.7	17.2	-	583.2	178.1	8.4	277.9	2,010.5
<b>Entire Corridor Alignment Alternatives: Acres within 1 Mile</b>								
Alternative 1	8,245.6	<del>1,449.13</del>	333.9	<del>12,942.9</del> 12,090.0	<del>1,642.2</del> 1,856.9	<del>1,248.1</del> 1,313.4	<del>3,919.3</del> 4,492.4	29,781.2
Alternative 2	8,105.0	<del>1,536.78</del>	333.9	<del>11,624.0</del> 10,933.6	<del>1,553.2</del> 1,631.4	<del>1,537.3</del> 1,603.9	<del>3,999.0</del> 4,544.7	28,689.1
Alternative 3	7,948.0	<del>1,455.42</del>	333.9	<del>10,856.0</del> 10,611.4	1,315.0	<del>1,857.2</del> 1,858.5	<del>5,341.0</del> 5,584.4	29,106.3
Alternative 4	7,948.0	<del>1,333.46</del>	333.9	<del>8,498.5</del> 8,253.7	963.7	<del>3,666.5</del> 3,367.8	<del>3,975.2</del> 4,218.5	26,419.1
Alternative 5	7,901.4	<del>1,366.13</del>	333.9	<del>8,161.7</del> 7,942.0	971.1	<del>3,657.4</del> 3,658.7	<del>3,936.0</del> 4,154.3	26,327.6

Notes:

1 No interchanges are proposed in the Central Segment. 2 Curry Creek Specific Plan is included as Planned/Proposed Development; it also includes land that is developed/unincorporated.

Revised Table G-4

**Acresages in Land Development Categories within 1 Mile of Interchanges and Corridor Alignment Alternatives  
(Variant B: Considering Curry Creek Community Plan Area and Agricultural Portion of SIAP as “Potentially Developable Land”)**

1-Mile Radii of Intersections	Existing and Approved Development	Existing Conservation Area	Municipal Facility	Planned/ Proposed Development	Developed Unincorporated	100-Year Floodplain (in Undeveloped Areas Only)	Potentially Developable	Total
<b>Western Segment: Acres within 1 Mile of Proposed Interchanges</b>								
Alternative 1	—	—	—	4,036.5	337.5	310.9	75.2	4,760.1
Alternative 2	—	—	—	4,036.5	337.5	310.9	75.2	4,760.1
Alternative 3	—	—	—	4,036.5	337.5	310.9	75.2	4,760.1
Alternative 4	—	116.5	—	2,544.8	12.1	1,062.4	—	3,735.8
Alternative 5	—	116.5	—	2,544.8	12.1	1,062.4	—	3,735.8
<b>Eastern Segment: Acres within 1 Mile of Proposed Interchanges</b>								
Alternatives 1 through 5	4,376	149.1	278.3	241.6	—	—	160.2	5,205.2
<b>Watt Avenue Interchange: Acres within 1 Mile (interchange is not proposed, but identified for this analysis per agency request)</b>								
Alternative 1 (Option 1)	43.7	11.2	—	<del>782.2</del> 784.0	—	154.7	<del>1,018.66</del> 8	2,010.5
Alternative 1 (Option 2), Alternative 2	266.3	<del>252.23</del>	—	<del>732.8</del> 744.6	7.9	—	<del>751.4</del> 739.4	2,010.5
Alternative 3	80.3	<del>175.24</del>	—	<del>791.7</del> 803.5	—	—	<del>963.3</del> 951.3	2,010.5
Alternative 4	80.3	<del>175.24</del>	—	<del>791.7</del> 803.5	—	—	<del>963.3</del> 951.3	2,010.5
Alternative 5	23.5	<del>117.68</del>	—	<del>989.6</del> 998.7	—	—	<del>879.7</del> 870.4	2,010.5
<b>Brewer Road Interchange: Acres within 1 Mile (interchange is not proposed, but identified for this analysis per agency request)</b>								
Alternative 1	—	—	—	16.8	560.3	33.0	1,400.35	2,010.5
Alternative 2	—	114.0	—	<del>121.6</del> 113.0	185.6	<del>270.4</del> 271.7	<del>1,318.81</del> 326.1	2,010.5
Alternative 3	—	122.8	—	<del>350.6</del> 329.6	—	<del>329.6</del> 331.0	<del>1,207.4</del> 1,227.0	2,010.5
Alternative 4	—	122.8	—	<del>350.6</del> 329.6	—	<del>329.6</del> 331.0	<del>1,207.41</del> 227.0	2,010.5
Alternative 5	—	56.0	—	<del>320.5</del> 299.6	—	<del>401.7</del> 403.0	<del>1,232.2</del> 1,251.9	2,010.5
<b>Eastern Segment Interchange: Acres within 1 Mile (interchange is not proposed, but identified for this analysis per agency request)</b>								
All Alternatives	517.0	17.2	-	<del>583.22</del> 7	<del>178.13</del> 3	8.4	<del>706.74</del> 5	2,010.5
<b>1 mile radii of alignments: Acres within 1 Mile</b>								
Alternative 1	7,592.6	<del>1,449.13</del>	333.9	<del>10,396.8</del> 40,414.1	1,856.9	1,469.7	<del>6,682.16</del> 664.7	29,781.2
Alternative 2	7,452.1	<del>1,536.78</del>	333.9	<del>10,003.4</del> 40,001.2	1,631.1	1,707.99.3	6,024.07	28,689.1
Alternative 3	7,295	1,455.24	333.9	<del>10,252.0</del> 40,248.6	1,315	1,871.8 3.1	<del>6,583.4</del> 6,585.2	29,106.3
Alternative 4	7,295	1,333.46	333.9	<del>7,897.0</del> 7,893.6	963.7	<del>3,379.6</del> 3,380.9	<del>5,216.5</del> 5,218.4	26,419.1
Alternative 5	7,248.4	1,366.13	333.9	<del>7,658.7</del> 7,649.5	971.1	<del>3,675.43</del> 658.7	<del>5,092.0</del> 5,099.7	26,327.6

Page G-44, third full paragraph, fourth and fifth sentences, are revised as follows:

As shown in Table G-3 and illustrated on Figure G-14, a 1-mile radius from such an interchange would encompass the largest amount of Potentially Developable Land along the Alternative 1 corridor alignment (1,395.41,400.3 acres), followed by Alternative 2 (1,318.0 1,326.1 acres). The smallest amounts of Potentially Developable Land lie within a 1-mile radius of the Brewer Road interchange on the Alternative 3, 4, and 5 corridor alignments (1,2027.4 acres on Alternatives 3 and 4 and 1,232.21,251.9 acres on the Alternative 5 corridor alignment).

Page G-45, Conclusions, first paragraph, second sentence, is revised as follows:

These include the anticipated residential build-out of approved and proposed developments by 2040 regardless of parkway construction, and the various methodologies described in Chapter 2 of this partially Revised Draft Tier 1 EIS/EIR. These analyses concluded an assumption that there would not be substantial differences in growth inducement potential (and therefore in the potential for secondary and indirect impacts) among the corridor alignment alternatives.

Page G-45, second and third sentences, are revised as follows:

The largest amount of Potentially Developable Land within a 1-mile limit is found along Alternative 3 (5,341.05,584.4 acres), followed by Alternatives 2 and 4 (3,999.04,544.7 and 3,975.24,492.1 acres, respectively). The smallest amount of Potentially Developable Land lies within 1 mile of ~~the northerly alignments~~ (Alternatives 1 4 and 5, with 3,919.34,218.5 and 3,936.04,154.3 acres, respectively), with Alternative 5 1 having the least amount of Potentially Developable Land and Alternative 5 a slightly higher but similar amount. This is illustrated in bar graph form on Figure G-15.

Page G-45, second paragraph, second sentence, is revised as follows:

Under this variant, as shown in Table G-4, Alternative 5 would affect the least Potentially Developable Land (5,092.09.7 acres) and Alternative 1 would affect the most (6,682.16,664.7 acres).

Page G-45, first full paragraph, third and fourth sentences, are revised as follows:

Depending on the variant considered, it also supports the MEPLAN findings that indicate that Alternatives 4 and 5 have less potential to induce growth than Alternatives 1 through 3. MEPLAN findings indicate that Alternatives 1 through 3 would attract more households and jobs than Alternatives 4 and 5. Alternative 5 would provide the least amount of access to Potentially Developable Land.

Page G-45, the following text is added as a new paragraph before the last paragraph:

For Variant A, this new analysis indicates very little difference between northern and southern alternatives, with less than 17 acres of Potentially Developable Land between the two lowest alternatives; Alternative 1 (3,919.3 acres) and Alternative 5 (3,936.0 acres). Under Variant B, Alternative 1 has the greatest amount of Potentially Developable Land (6,682.1 acres), while Alternative 5 has the lowest (5,092.0 acres).

Page G-45, last paragraph, third sentence, is revised as follows:

As shown in Figure G-12, all of the build alternatives would provide access to large areas of Potentially Developable Land with the construction of a Watt Avenue interchange, except for Alternative 1, Option 1 (under Variant A).

Page G-46, second full paragraph is revised as follows:

For all of these reasons, it is evident that there is very little difference between the northern and southern alternatives in terms of growth inducement. MEPLAN findings indicate that Alternative 1 would result in more growth (slightly more households and jobs), than Alternative 5. The analysis of Potentially Developable Land under Variant A indicates Alternatives 1 and 5 are almost identical, with Alternative 1 having 16.7 fewer acres than Alternative 5. The least growth inducing corridor alignment alternative would be Alternative 5. This difference represents less than 0.065 percent of the total area of the Alternative 5 corridor alignment analysis area. Under Variant B, Alternative 1 would be most growth inducing, with Alternative 5 having 1,590.1 fewer acres than Alternative 1. This difference represents more than 5.3 percent of the total Alternative 1 corridor analysis area.

Page G-73, second paragraph is revised as follows:

Table G-7 indicates that, under Variant A, Alternatives 1, 2, and 3 would have a high potential to influence development in wetlands and other Waters of the United States, ranging from 73.1 acres under Alternative 3 to 54.264.7 acres under Alternative 1 and 53.162.4 acres under Alternative 2. These resources would have the least potential to be influenced by development under Alternatives 4 and 5, at 32.9 and 37.9 acres, respectively. Under Variant B, impacts are similar, with Alternative 1 having the highest impacts at 79.481.4 acres and Alternatives 4 and 5 the lowest, at 32.9 and 37.9 acres, respectively.

Page G-73, Table G-7, is revised as shown in Revised Table G-7, on the following page.

Page G-73, last paragraph is revised as follows:

Under Variant A, potential effects on vernal pool complexes would vary more across alternatives, ranging from 446.344.9 acres under Alternative 2 to 586.2588.9 acres under Alternative 3. Alternatives 2 and 4 would generally have the least potential to influence development in vernal pool complexes, with Alternatives 1 and 3 having the most potential. Impacts would be higher across all alternatives under Variant B, with Alternative 2 having the lowest impacts (1,079.74 acres) and Alternative 1 having the highest (1,243.02.4 acres).

Page G-74, first two full paragraphs, is revised as follows:

Under Variant A, Alternative 1 would have the lowest potential to influence development in seasonally flooded rice habitat (approximately 1,574.14,801.5 acres), followed by Alternative 2 (1,795.02,092.4 acres). Alternative 3 would have the highest potential to influence development in seasonally flooded rice habitat (approximately 2,702.62,936 acres). Impacts would be higher across all alternatives under Variant B, with Alternative 5 having the lowest impacts (2,536.52,544.8 acres) and Alternative 3 having the highest (3,281.03,283.9 acres).

**Revised Table G-7**  
**Acres of Potentially Developable Land**  
**within 1 Mile of the Project Alternatives by Selected Habitat Type –**  
**Including Development in PCCP's Future Reserve Acquisition Areas**  
**(Scenario 1)**  
**(acres)**

Alternative/ Variant	Wetlands/ Waters of the United States		Vernal Pool Complexes		Seasonally Flooded Rice		Other Developable Land		Total Potentially Developable Land <sup>1</sup>	
	Variant A <sup>2</sup>	Variant B <sup>3</sup>	Variant A	Variant B	Variant A	Variant B	Variant A	Variant B	Variant A	Variant B
Alternative 1	<u>54.2</u> <del>64.7</del>	<b>79.4</b>	<u>562.6</u> <del>565.3</del>	<b>1,243.0</b> <del>1,242.4</del>	<u>1,574.1</u> <del>1,801.5</del>	2,564.8 <del>2,548.4</del>	<u>1,739.2</u> <del>2,071.5</del>	<b>2,806.9</b> <del>3,021.6</del>	<u>3,919.3</u> <del>4,492.1</del>	<b>6,682.1</b> <del>6,664.7</del>
Alternative 2	53.1 <del>62.4</del>	72.9	<u>446.3</u> <del>449.0</del>	<u>1,079.7</u> <del>1,079.1</del>	<u>1,795.0</u> <del>2,092.1</del>	2,839.2 <del>2,841.0</del>	<u>1,714.2</u> <del>1,951.0</del>	2,041.7 <del>2</del>	<u>3,999.0</u> <del>4,544.7</del>	6,024.0 <del>7</del>
Alternative 3	<b>73.1</b>	73.1	<u>586.2</u> <del>588.9</del>	<u>1,219.6</u> <del>1,219.0</del>	<b>2,702.6</b> <del>2,936.0</del>	<b>3,281.0</b> <del>3,283.9</del>	<u>1,989.2</u> <del>1,996.4</del>	<u>2,019.8</u> <del>2,019.3</del>	<b>5,341.0</b> <del>5,584.4</del>	6,583.4 <del>6,585.2</del>
Alternative 4	32.9	32.9	<u>476.9</u> <del>479.6</del>	<u>1,110.3</u> <del>1,109.8</del>	<u>2,131.4</u> <del>2,364.8</del>	2,708.8 <del>2,711.8</del>	<u>1,340.1</u> <del>1,347.2</del>	<u>1,370.6</u> <del>1,370.1</del>	<u>3,975.2</u> <del>4,218.5</del>	5,216.5 <del>5,218.4</del>
Alternative 5	37.9	37.9	<u>531.1</u> <del>533.8</del>	<u>1,164.5</u> <del>1,164.0</del>	<u>2,037.0</u> <del>2,252.4</del>	<u>2,536.5</u> <del>2,544.8</del>	<u>1,337.3</u> <del>1,337.4</del>	1,360.3	<u>3,936.0</u> <del>4,154.3</del>	<u>5,092.0</u> <del>5,099.7</del>

**Notes:** Habitat area estimates are based on available habitat characterization of the developable lands within 1 mile of the proposed alternatives. The total area of developable land may include additional habitat types that are not mapped, such as uplands, farmland and woodland areas.

**Bold** numbers are greatest impact.

*Italic* numbers are least impact.

<sup>1</sup> Total developable land is the sum of all four previous column categories. The sum of individual habitat categories do not precisely agree with total developable lands due to some overlap in GIS data between vernal pool complexes and wetland acreages.

<sup>2</sup> Variant A comprises the land use information assumed in the Draft Tier 1 EIS/EIR; that the Curry Creek Community Plan area and Sunset Industrial Area Plan are developed.

<sup>3</sup> Variant B assumes the Curry Creek Community Plan area and a portion of Sunset Industrial Area Plan are Potentially Developable Land.

Under Variant A, if development in the PCCP Reserve Acquisition Areas were unconstrained, the *total* Potentially Developable Land (which includes wetlands, vernal pool complexes, seasonally flooded rice, and other developable land) within 1 mile of the project alternatives would be lowest for Alternative 15 (3,919.34,154.3 acres), followed closely by Alternative 5 (3,936.0 acres; a 0.43 percent difference), and therefore Alternatives 1 and 5 would have the lowest potential to influence development in the resource areas analyzed. Alternative 15 has 16.7 fewer acres~~64 acres~~ of Potentially Developable Land ~~fewer than Alternative 5, 56.0 acres fewer than Alternative 4, 80.0390 acres fewer than Alternative 2, and 1,422.01,430 acres fewer than Alternative 3, and 338 acres fewer than Alternative 1.~~ Alternative 3 has the largest area of Potentially Developable Land (5,341.05,584.4 acres), and thus would have the highest potential to influence development in the resource areas analyzed. Under Variant B, impacts would be higher for all alternatives, with Alternative 5 having the lowest (5,092.05,099.7 acres) and Alternative 1 having the highest (6,682.16,664.7 acres).

Page G-74, Table G-8, is revised as shown in Revised Table G-8.

**Revised Table G-8**  
**Total Area of Potentially Developable Land**  
**within 1 Mile of the Project Alternatives by Habitat Type –**  
**Excluding Development in PCCP Future Reserve Acquisition Areas**  
**(Scenario 2)**  
**(acres)**

Alternative/ Variant	Wetlands/Waters of the United States		Vernal Pool Complexes		Seasonally Flooded Rice		Other Developable Land		Total Potentially Developable Land <sup>1</sup>	
	Variant A <sup>2</sup>	Variant B <sup>3</sup>	Variant A	Variant B	Variant A	Variant B	Variant A	Variant B	Variant A	Variant B
Alternative 1	39.2	64.5	446.5	1,101.9	935.3	1,921.9	1,012.8	2,075.4	2,433.9	5,164.1
	49.8		449.3	1,101.4	1,162.5	1,906.0	1,341.3		2,993.5	5,172.3
Alternative 2	38.1	58.0	333.0	941.6	1,073.8	2,114.0	973.8	1,300.7	2,418.7	4,414.3
	47.2		335.8	941.0	1,352.4	2,097.9	1,210.4	2	2,937.7	4,416.4
Alternative 3	46.1*	46.1	421.3	1,029.9	1,385.9	1,960.9	1,005.8	1,036.1	2,859.1	4,072.9
			424.0	1,029.3	1,601.7	1,946.8	1,013.1	1,035.6	3,078.0	4,067.7
Alternative 4	15.8	15.8	392.9	1,001.4	1,151.4	1,725.4	610.3	640.4	2,170.3	3,383.1
			395.6	1,000.9	1,367.2	1,711.3	617.4	639.9	2,392.6	3,381.4
Alternative 5	19.6	19.6	392.9	1,001.4	1,072.7	1,570.5	609.0	631.5	2,094.1	3,223.1
			395.6	1,000.9	1,270.6	1,562.1			2,291.4	3,225.0

**Notes:** Habitat area estimates are based on available habitat characterization of the developable lands within 1 mile of the proposed alternatives. The total area of developable land may include additional habitat types that are not mapped.

**Bold** numbers are greatest impact.

*Italic* numbers are least impact.

<sup>1</sup> Total developable land is the sum of all four previous column categories.

<sup>2</sup> Variant A comprises the land use information assumed in the Draft Tier 1 EIS/EIR; that the Curry Creek Community Plan area and Sunset Industrial Area Plan are developed.

<sup>3</sup> Variant B assumes the Curry Creek Community Plan area and a portion of Sunset Industrial Area Plan are Potentially Developable Land.

\* bold added

Page G-75, the second and third sentences of the first paragraph are revised as follows:

The potential for future development in wetlands would ~~be more than~~ be more than double or more under Alternatives 1, 2, and 3, at 39.249.8, 38.147.2, and 46.1 acres, respectively. Alternative ~~3~~ 4 would have the highest potential to influence development in wetlands and Waters of the United States under this scenario.

Page G-75, second paragraph is revised as follows:

Under Variant A, the potential to influence development in vernal pool complexes would be lowest for Alternative 2 (333.0335.8 acres), and highest for Alternative 1 (446.5449.3 acres). Impacts would be higher across all alternatives under Variant B, with Alternative 2 having the lowest impacts (941.6 acres) and Alternative 1 having the highest (1,101.94 acres). Under Variant A, ~~the~~ potential to influence development in seasonally flooded rice would vary from a low of 935.31,162.5 acres under Alternative 1 to a high of 1,385.91,601.7 acres under Alternative 3. Impacts on this resource would be higher across all alternatives under Variant B, with Alternative 5 having the lowest

impacts (~~1,570.51,562.1~~ acres) and Alternative 2 having the highest (~~2,114.0~~ 2,097.9 acres).

Page G-78, last three sentences of fifth paragraph, are revised as follows:

As described above, the potential for the various alternatives to influence development in Potentially Developable Lands would be least under either Alternatives 4-1 and Alternative 5, and greatest under Alternative 1, depending on the scenario and variant used. ~~In two of the four potential combinations of scenario and variant, Therefore,~~ based on this parameter, fragmentation effects would be ~~greatest~~ least under Alternative 1 Alternatives 4 and 5 and greatest under Alternative 1. ~~In the two other potential combination of variant and scenario, fragmentation effects would be greatest under Alternative 3.~~

Page G-79, first paragraph is revised as follows:

As Tables G-7 and G-8 show, the area of Potential Developable Land within 1 mile of the proposed alternatives substantially differs between the northern and southern alternatives. ~~Under one of the land use scenarios, (Scenario 1, Variant A) Although these differences would vary somewhat depending on the land use variants (Variant A versus Variant B) and PCCP scenarios (Scenario 1 versus Scenario 2) that were considered,~~ Alternative 1 has the lowest area of Potentially Developable Land by 16.7 acres as compared to Alternative 5. Under the other three possible future land use combinations, Alternative 5 is lower by between 339.0 and 1,941.0 acres. ~~the relative rankings of the alternatives are similar irrespective of which combination of scenario and variant is considered.~~ By inference, an increased potential for development could lead to increased fragmentation of biological resources and reduced resource connectivity. ~~As described above, the potential for the various alternatives to influence development in Potentially Developable Lands would be least under Alternatives 4 and 5, and greatest under Alternative 1.~~ Therefore, based on this parameter, the potential for fragmentation effects would be also be least under Alternatives 4 and 5 under three of the four possible land use scenarios, and least for Alternative 1 under the fourth scenario, but only by 16.3 acres (0.065 percent of the analysis area), resulting in very similar fragmentation effects under Alternatives 1 and 5 under this scenario, and greatest under Alternative 1. ~~This ranking is the same for Scenario 1 versus Scenario 2 and Variant A versus Variant B.~~

Page G-79, fourth paragraph, first sentence, is revised as follows:

For all of these reasons, indirect effects of fragmentation of biological resources associated with growth would be lowest ~~under~~ Alternative 5. ~~5, similar but slightly greater under Alternative 4, and greatest under Alternative 1.~~

Page G-92, first full paragraph, second sentence, is revised as follows:

Other projects in the study area would potentially reduce this by up to ~~1,132.0~~ 105.0 acres, a reduction of approximately 24.6 percent (Table G-14) of the remaining wetlands.

Page G-92, second full paragraph, second sentence, is revised as follows:

As shown on Table G-13, other reasonably foreseeable projects could impact approximately ~~8,022.66~~ 7,971.65 acres of this habitat type in the study area, a reduction of approximately ~~45.06~~ percent (Table G-14).



Page G-92, third full paragraph, fourth sentence, is revised as follows:

Other reasonably foreseeable projects in the study area are estimated to potentially affect as much as 1,351.76 acres of vernal pools, a reduction of 45.9~~8~~ percent (Table G-14).

Page G-92, fourth full paragraph, last sentence, is revised as follows:

Other projects would cause impacts to 24.6 percent of existing wetlands.

Page G-93, Table G-13, is revised as shown on the following page.

Page G-94, Table G-14, is revised as shown on the second page following.

Page G-94, first paragraph, last sentence, is revised as follows:

Other reasonably foreseeable projects in the study area are estimated to potentially affect as much as 1,351.76 acres of vernal pool wetlands, a reduction of 45.9 percent (Table G-14).

**Revised Table G-13  
Summary of Potential Impacts to Wetlands and Vernal Pools  
Planned and Proposed Projects Excluding Placer Parkway**

Resource Category	Existing Acres in Cumulative Impacts Study Area 2007	Estimated Individual Project Impacts												Totals Impacts All Other Projects (acres)
		Placer Ranch <sup>4</sup>	Riolo Vineyard <sup>5</sup>	Placer Vineyards <sup>6</sup>	Sierra Vista <sup>7</sup>	Regional University <sup>8</sup>	Creekview <sup>10</sup>	Curry Creek <sup>11</sup>	Sutter Point <sup>11</sup>	Roseville Retention Basin <sup>12</sup>	Elverta/Rio Linda Specific Plan <sup>13</sup>	Brookfield <sup>11,14</sup>	City of Lincoln Expansion <sup>15</sup>	
Wetlands <sup>1</sup>	<b>4,609</b>	<b>28.75</b>	<b>2.639</b>	<b>61.1</b>	<b>37.74</b>	<b>18</b>	<b>9.89</b>	<del>66.83</del> <b>40.40</b>	<b>45.03</b>	<b>&lt;1</b>	<b>14.63</b>	<b>22.89</b>	<b>824.55<sup>7</sup></b>	<b>1,105.3</b>
Vernal pool complex <sup>2</sup>	17,666	29.1 <sup>3</sup>	No impacts	<b>63</b>	50.7	30.77 <sup>9</sup>	9.6	<del>54.66</del> <b>35</b>	283.26	No impacts	56.76	251.21	7,193.6	<del>8,022.6</del> <b>635</b>
Vernal pool wetlands <sup>3</sup>	<b>2,944</b>	<b>4.85</b>	No impacts	<b>25.5</b>	8.45	<b>5.15</b>	<b>1.3</b>	<del>9.11</del> <b>05</b>	47.21	No impacts	<b>9.46</b>	41.86	1,198.9	<del>1,351.7</del> <b>6</b>

**Notes:**

<sup>1</sup> Excludes vernal pools, ponds, and streams; all other wetland types, including seasonally flooded rice, are included. Numbers in bold are actual impacts based on delineations.

<sup>2</sup> Vernal pool complexes include upland areas. Numbers in bold are actual impacts based on delineations.

<sup>3</sup> All values except where in bold are estimated based on the average density of vernal pools in a typical vernal pool complex. It is reasonable to use a 6:1 ratio of upland acreage to vernal pool acreage. All impacts acreages exclude any mitigation opportunities that could be implemented. Numbers in bold are actual wetland impacts based on delineations. All vernal pool wetland values are included in vernal pool complex values.

<sup>4</sup> Data from Placer Ranch Specific Plan (PRSP) Second Administrative Draft EIR, Table 6.4. As of the time this analysis was prepared, the developer for the proposed PRSP has suspended work for approximately three months, for reasons related to estate planning. The application submitted to the City of Roseville has not been withdrawn.

<sup>5</sup> Data from Riolo Vineyards Specific Plan DEIR, Table 6-7.

<sup>6</sup> Data from Section 4.4.2, Table 4.4-10 Placer Vineyards Specific Plan Revised Draft EIR.

<sup>7</sup> Data reflect estimated impacts to wetlands on site.

<sup>8</sup> Data from Regional University Specific Plan DEIR, Section 6.4.1

<sup>9</sup> Numbers represent actual vernal pool complexes within the project study area; the assumption is that all vernal pools could potentially be impacted.

<sup>10</sup> Data estimated from Creekview wetland delineation and vernal pool field survey

<sup>11</sup> Acreage calculated based on total wetlands and vernal pools within project area; the assumption is that all resources could be potentially impacted

<sup>12</sup> Data from City of Roseville Retention Basin Project, DEIR.

<sup>13</sup> Data from Elverta Specific Plan Final EIR.

<sup>14</sup> Acreages were derived from the PCCP, not delineated on site.

<sup>15</sup> Data from Table 7-1, City of Lincoln General Plan Update, Recirculated EIR. Impacts are estimated and are the maximum that could occur assuming all resources are affected.

**Revised Table G-14  
Summary of Potential Cumulative Impacts to Wetland Habitats from  
Placer Parkway and Other Planned and Proposed Projects in the Study Area**

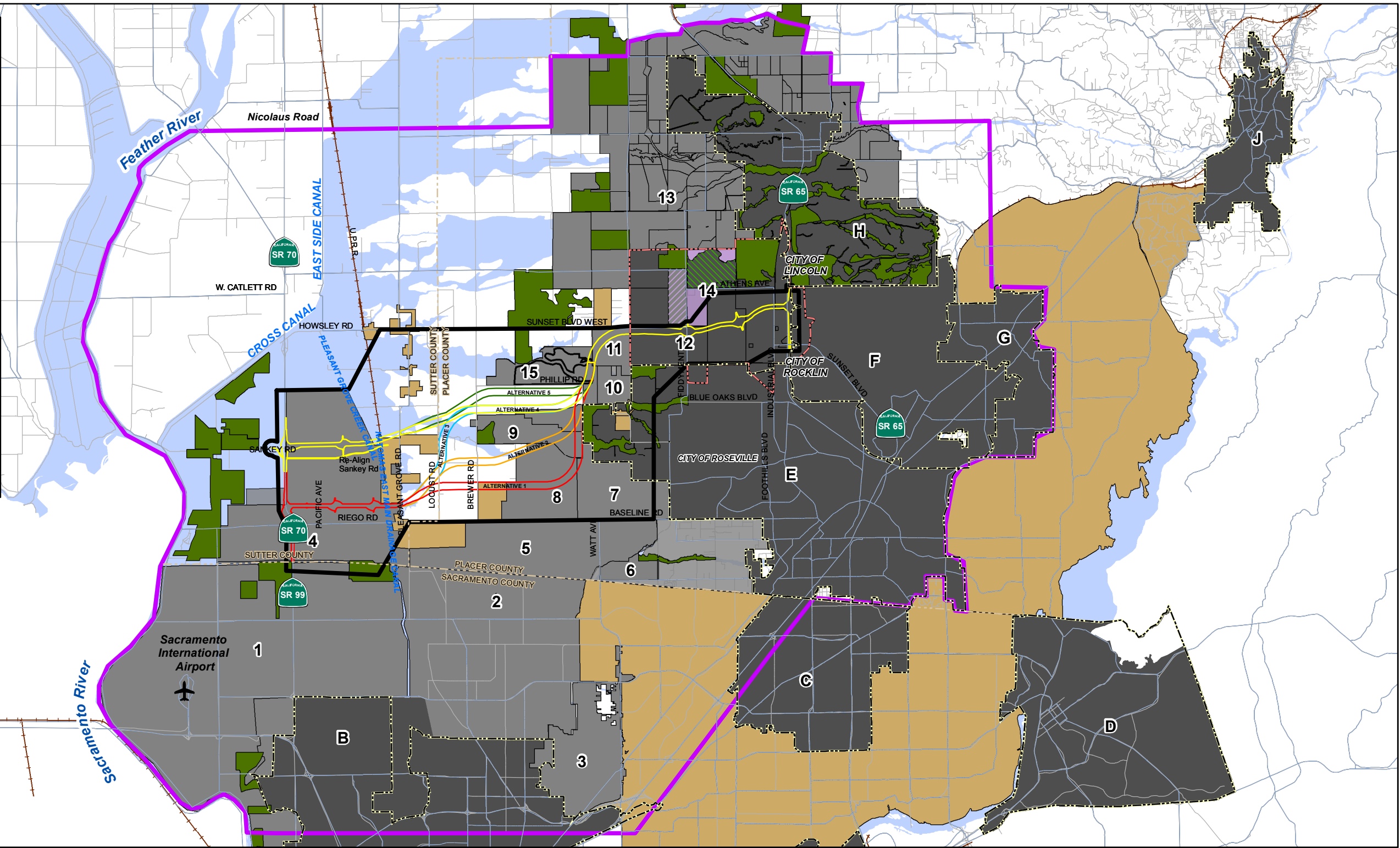
Resource Category	Existing Acres (2007)	Placer Parkway (Acres and Percentage of Impacts on Existing)					Estimated Cumulative Impacts		
		Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Totals Impacts: All Other Projects (Acres and percentage of impacts of existing)	Total Impacts by percentage of Parkway and Other Projects (maximum)	Maximum Parkway Impacts as Percentage of Total Impacts
Wetlands <sup>1</sup>	4,609	35.8 0.78%	30.9 0.67%	32 0.69%	28.3 0.61%	28 0.61%	<u>1,132.03</u> 24.6%	24.78%	0.78%
Vernal pool complex <sup>2</sup>	17,666	122.7 0.69%	124.1 0.70%	127.6 0.72%	106.7 0.60%	124 0.70%	<u>8,022.66</u> 45.41%	46.12%	0.72%
Vernal pool wetlands <sup>3</sup>	2,944	20.5 0.69%	20.7 0.70%	21.3 0.72%	17.8 0.60%	20.7 0.70%	<u>1,351.76</u> 45.9%	46.62%	0.72%

**Notes:**

- <sup>1</sup> Excludes vernal pools, ponds, and streams; all other wetland types are included.
- <sup>2</sup> Vernal pool complexes include upland areas.
- <sup>3</sup> All values are estimated based on the average density of vernal pools in a typical vernal pool complex. It is reasonable to use a 6:1 ratio of upland acreage to vernal pool acreage. "Wetlands" include non-jurisdictional wetlands but exclude streams, ponds and creeks. All impacts acreages exclude any mitigation opportunities that could be implemented. Numbers in bold are actual wetland impacts based on delineations. All vernal pool wetland values are included in vernal pool complex values.

Map Document: (U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\EIS\Chapter\_3-0\_Analysis\_Framework\Fig\_3-1\_Secondary\_and\_Indirect\_Impact\_Analysis\_Study\_Area\_new.mxd) #8/2009 -- 10:06:18 AM KLawrence

- Cities/Towns:**
- A - Woodland
  - B - Sacramento
  - C - Citrus Heights
  - D - Folsom
  - E - Roseville
  - F - Rocklin
  - G - Loomis
  - H - Lincoln
  - I - Wheatland
  - J - Auburn
- Planned/Proposed Development Areas:**
- 1 - Natomas Joint Vision Area
  - 2 - Rio Linda and Elverta Community Plan Area
  - 3 - McClellan Redevelopment Project Area
  - 4 - Measure M / Sutter Pointe
  - 5 - Placer Vineyards Specific Plan Area
  - 6 - Riolo Vineyards Specific Plan Area
  - 7 - Sierra Vista Specific Plan Area
  - 8 - Curry Creek Community Plan Area
  - 9 - Regional University Specific Plan Area
  - 10 - Creekview Specific Plan Area
  - 11 - Brookfield Property
  - 12 - Placer Ranch Specific Plan Area<sup>1</sup>
  - 13 - City of Lincoln SOI Expansion Area
  - 14 - Sunset Industrial Area Plan (SIAP)<sup>2</sup>
  - 15 - Reason Farms
- <sup>1</sup> Includes Placer Ranch Specific Plan area (#12); entire SIAP is shown as approved for development
- <sup>2</sup> Placer Ranch Specific Plan is in SIAP and is therefore shown as approved for development, specific development proposal pending




Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville

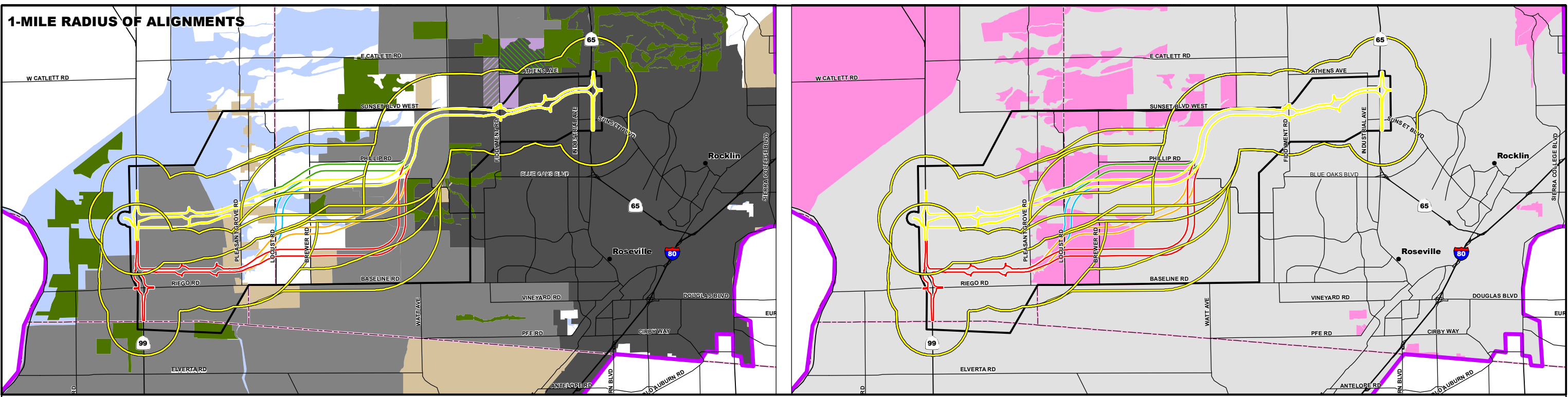
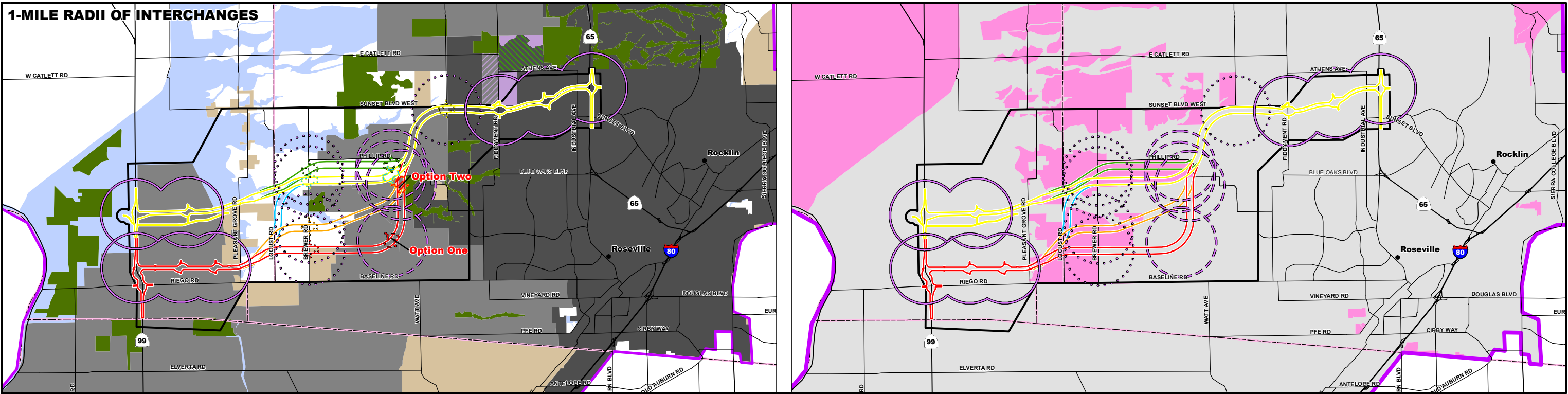


TIER 1 EIS/EIR

## Secondary and Indirect Impact Analysis Study Area

Figure G-1 (revised)

April 2009



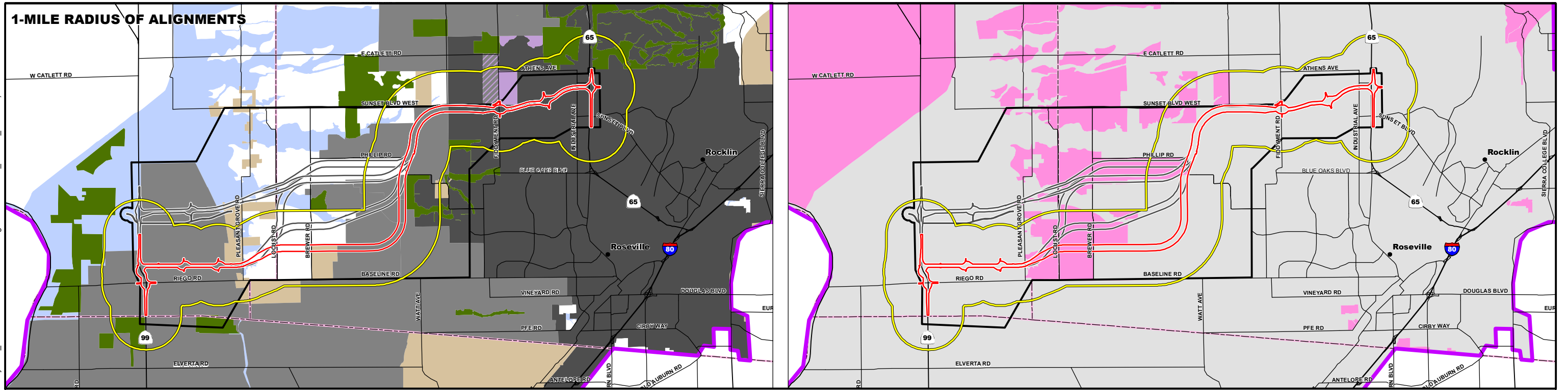
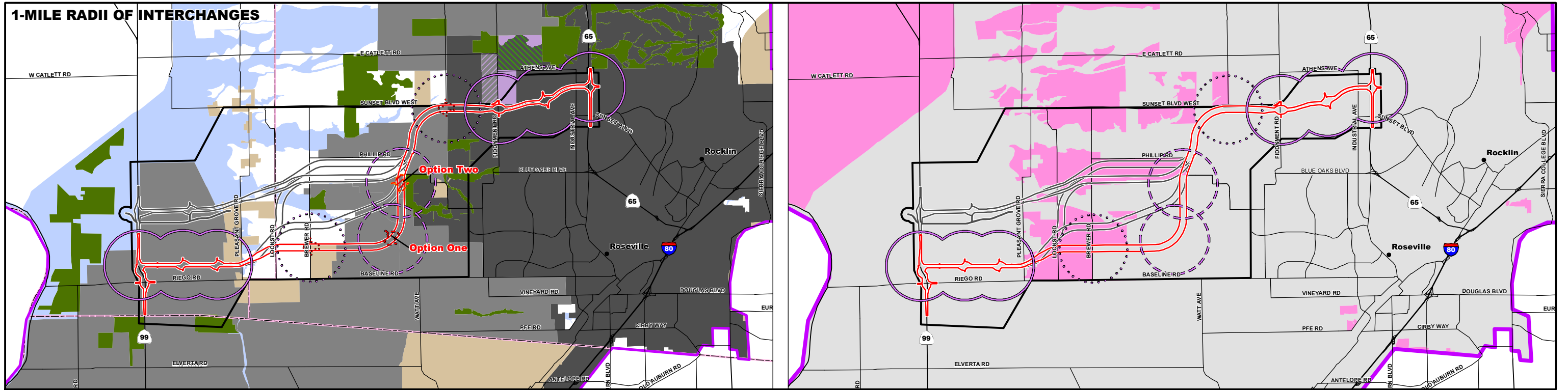
<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #4F81BD; border: 1px solid black; margin-right: 5px;"></span> Existing Conservation Areas</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #D9EAD3; border: 1px solid black; margin-right: 5px;"></span> Developed Unincorporated Areas</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #F4CCCC; border: 1px solid black; margin-right: 5px;"></span> Municipal Facilities</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #F4CCCC; border: 1px solid black; margin-right: 5px;"></span> Planned/Proposed Development</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #F4CCCC; border: 1px solid black; margin-right: 5px;"></span> Existing and Approved Development</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #ADD8E6; border: 1px solid black; margin-right: 5px;"></span> 100-Year Floodplain</li> <li><span style="display: inline-block; width: 15px; height: 10px; background: repeating-linear-gradient(45deg, transparent, transparent 2px, #FF0000 2px, #FF0000 4px); border: 1px solid black; margin-right: 5px;"></span> Proposed Landfill Expansion</li> <li><span style="display: inline-block; width: 15px; height: 10px; background: repeating-linear-gradient(45deg, transparent, transparent 2px, #00FF00 2px, #00FF00 4px); border: 1px solid black; margin-right: 5px;"></span> Pending Conservation Area</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px dashed black; margin-right: 5px;"></span> County Boundary</li> <li><span style="display: inline-block; width: 10px; height: 10px; border-radius: 50%; background-color: black; margin-right: 5px;"></span> City/Town</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid red; margin-right: 5px;"></span> Alternative 1</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid orange; margin-right: 5px;"></span> Alternative 2</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid blue; margin-right: 5px;"></span> Alternative 3</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid yellow; margin-right: 5px;"></span> Alternative 4</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid green; margin-right: 5px;"></span> Alternative 5</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid yellow; margin-right: 5px;"></span> Radii of Alignments</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid purple; margin-right: 5px;"></span> Study Area for Secondary and Indirect Impacts</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid black; margin-right: 5px;"></span> Project Study Area Boundary</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid red; margin-right: 5px;"></span> Conceptual Interchanges</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid red; margin-right: 5px;"></span> Potential Interchanges</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid blue; margin-right: 5px;"></span> Hypothetical Interchanges</li> </ul>	<p><b>Radii of Interchanges</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px solid purple; margin-right: 5px;"></span> Conceptual Interchange</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px dashed purple; margin-right: 5px;"></span> Potential Interchange (Watt Avenue)</li> <li><span style="display: inline-block; width: 15px; height: 10px; border: 1px dotted purple; margin-right: 5px;"></span> Hypothetical Interchange</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #D3D3D3; border: 1px solid black; margin-right: 5px;"></span> Developed or Constrained Land</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #FFC0CB; border: 1px solid black; margin-right: 5px;"></span> Undeveloped Land</li> </ul>
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Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville

Map Document: U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\landuse\_radii.mxd 4/8/2009 -- 10:16:09 AM KLawrence

Map Document: U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\alt1\_landuse\_radial.mxd 4/8/2009 -- 10:07:00 AM KLawrence



Existing Conservation Areas	100-Year Floodplain	Alternative 1	Radii of Alignments	Potential Interchanges	<b>Radii of Interchanges</b>	Developed or Constrained Land
Developed Unincorporated Areas	Proposed Landfill Expansion	Other Alternatives	Study Area for Secondary and Indirect Impacts	Hypothetical Interchanges	Potential Interchange (Watt Avenue)	Undeveloped Land
Municipal Facilities	Pending Conservation Area	Project Study Area Boundary	Conceptual Interchanges		Hypothetical Interchange	
Planned/Proposed Development	County Boundary					
Existing and Approved Development	City/Town					

Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville



TIER 1 EIS/EIR

Land Use by Type within 1 Mile, Alternative 1

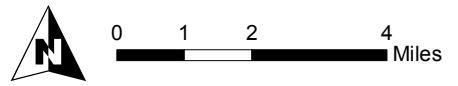
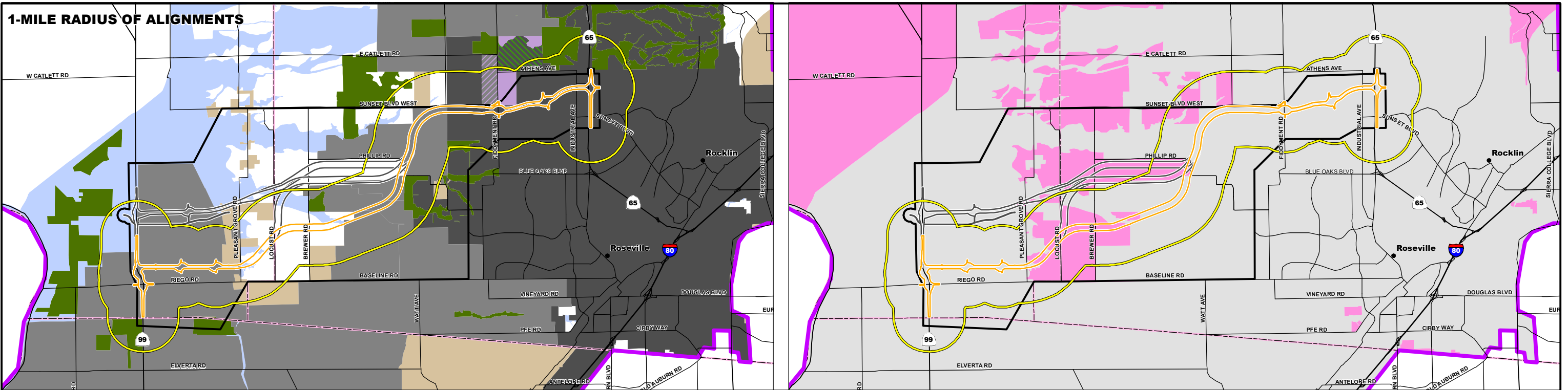
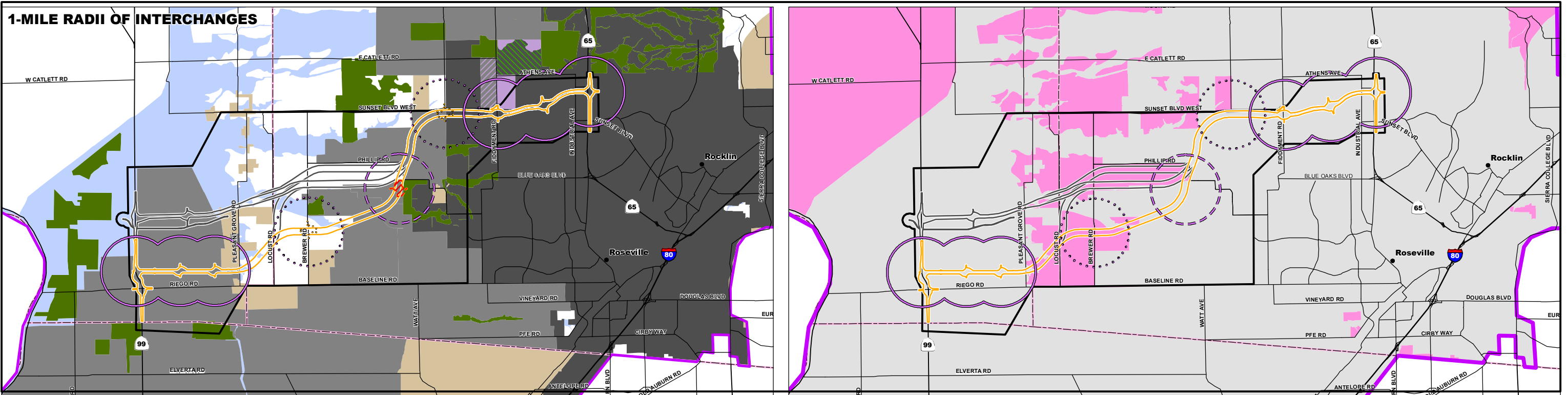


Figure G-6 (revised)

April 2009

Map Document: U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\alt2\_landuse\_radial.mxd 4/8/2009 -- 10:24:13 AM KLawrence



Existing Conservation Areas	100-Year Floodplain	Alternative 2	Radii of Alignments	Potential Interchanges	<b>Radii of Interchanges</b>	Developed or Constrained Land
Developed Unincorporated Areas	Proposed Landfill Expansion	Other Alternatives	Study Area for Secondary and Indirect Impacts	Hypothetical Interchanges	Potential Interchange (Watt Avenue)	Undeveloped Land
Municipal Facilities	Pending Conservation Area	Project Study Area Boundary	Conceptual Interchanges	Hypothetical Interchange		
Planned/Proposed Development	County Boundary					
Existing and Approved Development	City/Town					

Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville



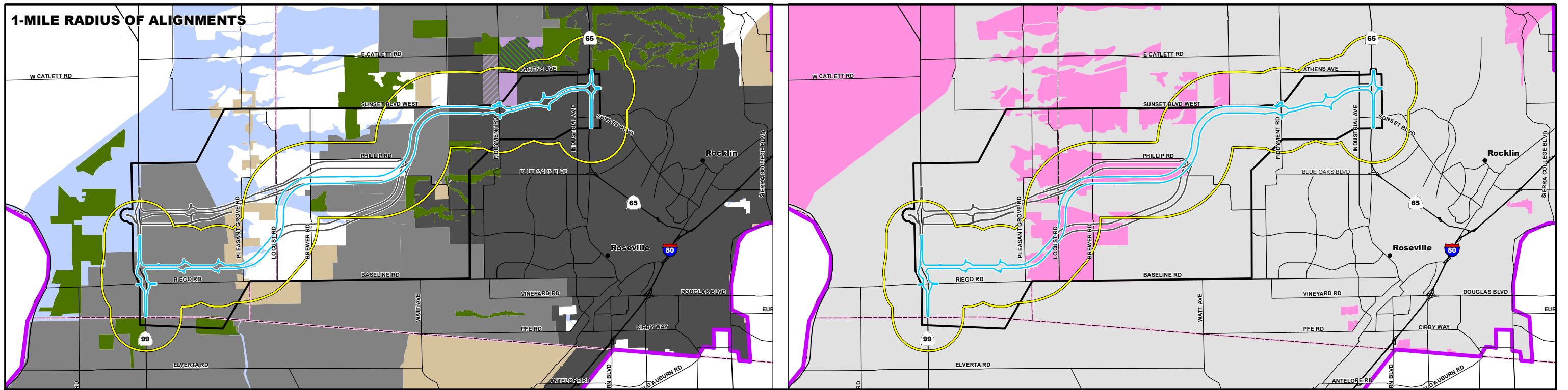
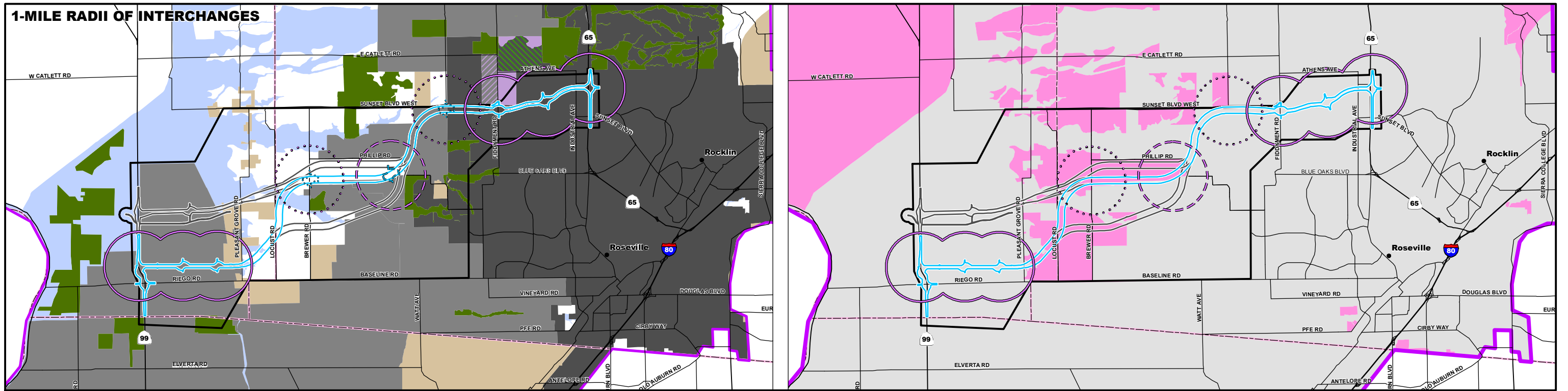
TIER 1 EIS/EIR

### Land Use by Type within 1 Mile, Alternative 2



Figure G-7 (revised)

April 2009



Existing Conservation Areas	100-Year Floodplain	Alternative 3	Radii of Alignments	Potential Interchanges	Developed or Constrained Land
Developed Unincorporated Areas	Proposed Landfill Expansion	Other Alternatives	Study Area for Secondary and Indirect Impacts	Hypothetical Interchanges	Undeveloped Land
Municipal Facilities	Pending Conservation Area	Project Study Area Boundary	Conceptual Interchanges	Conceptual Interchange	
Planned/Proposed Development	County Boundary	City/Town		Potential Interchange (Watt Avenue)	
Existing and Approved Development				Hypothetical Interchange	

Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville



TIER 1 EIS/EIR

### Land Use by Type within 1 Mile, Alternative 3

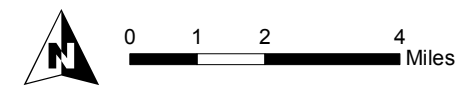


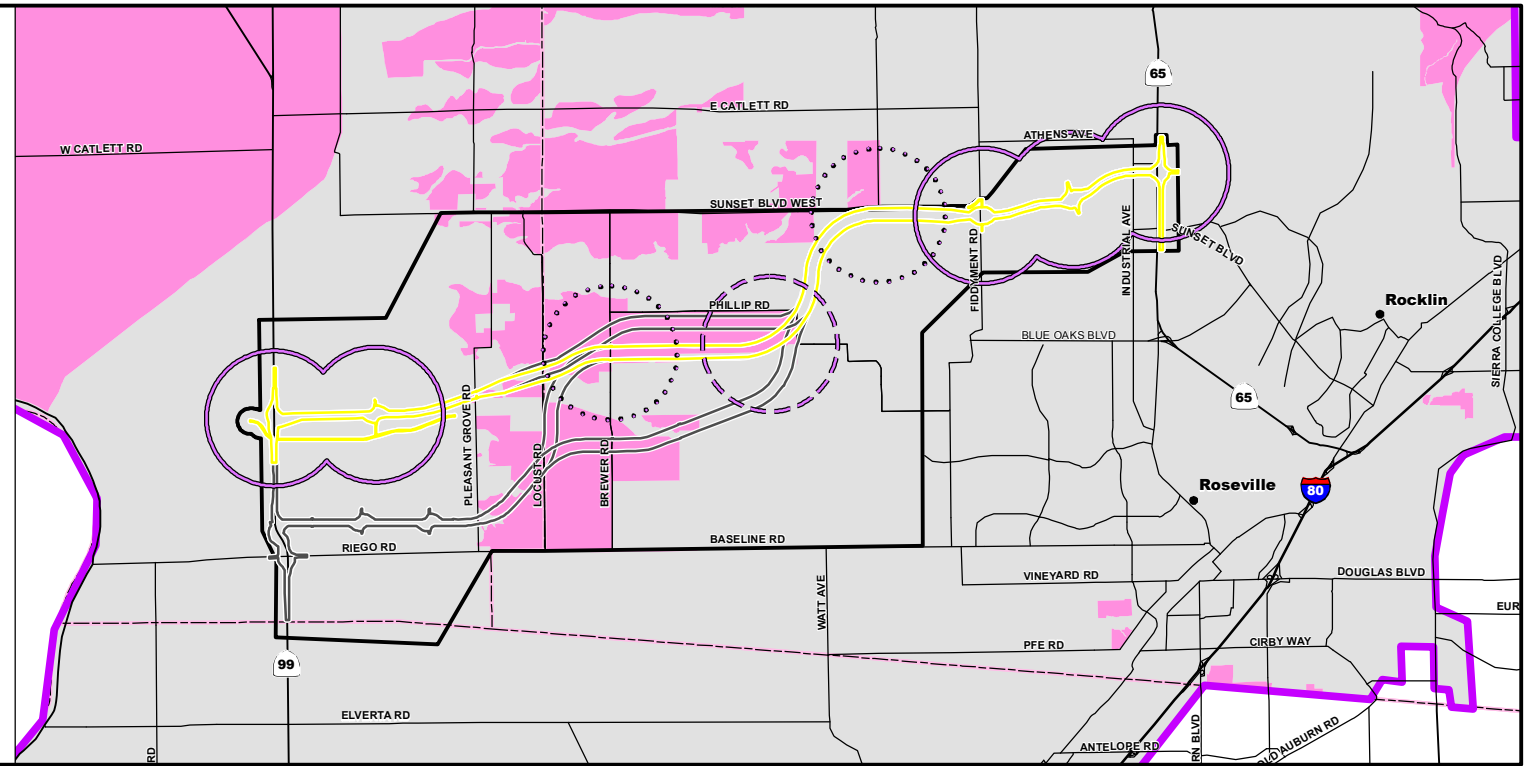
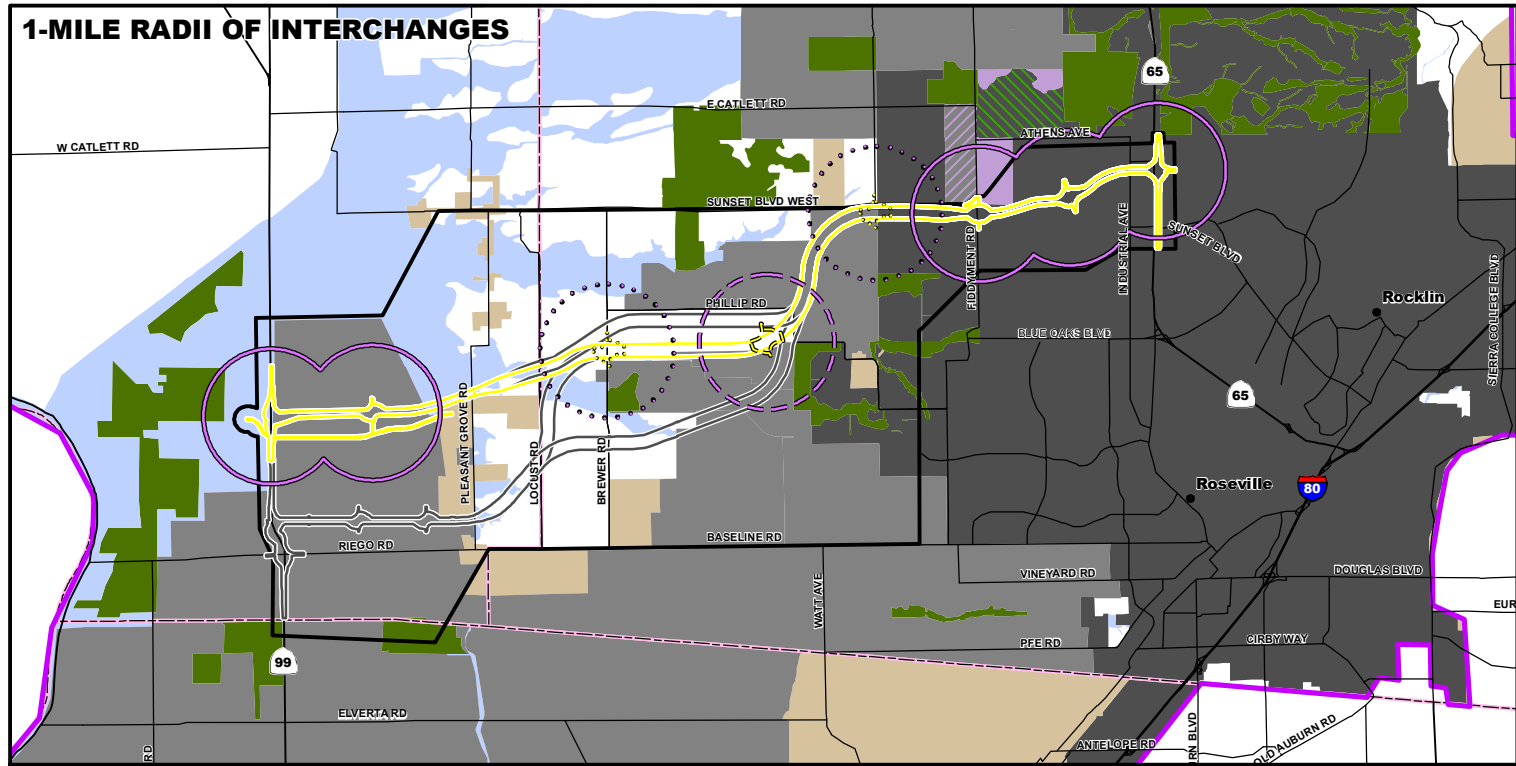
Figure G-8 (revised)

April 2009

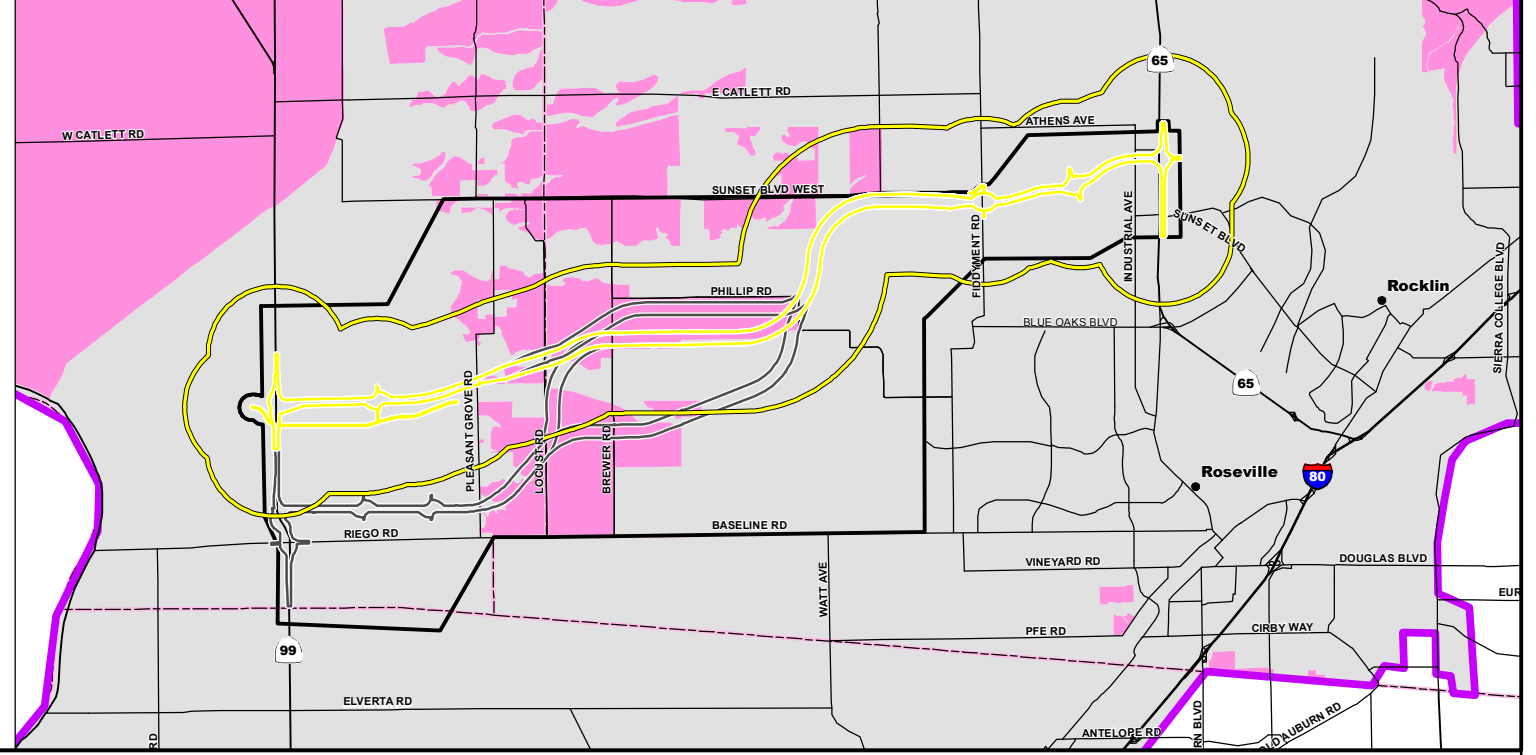
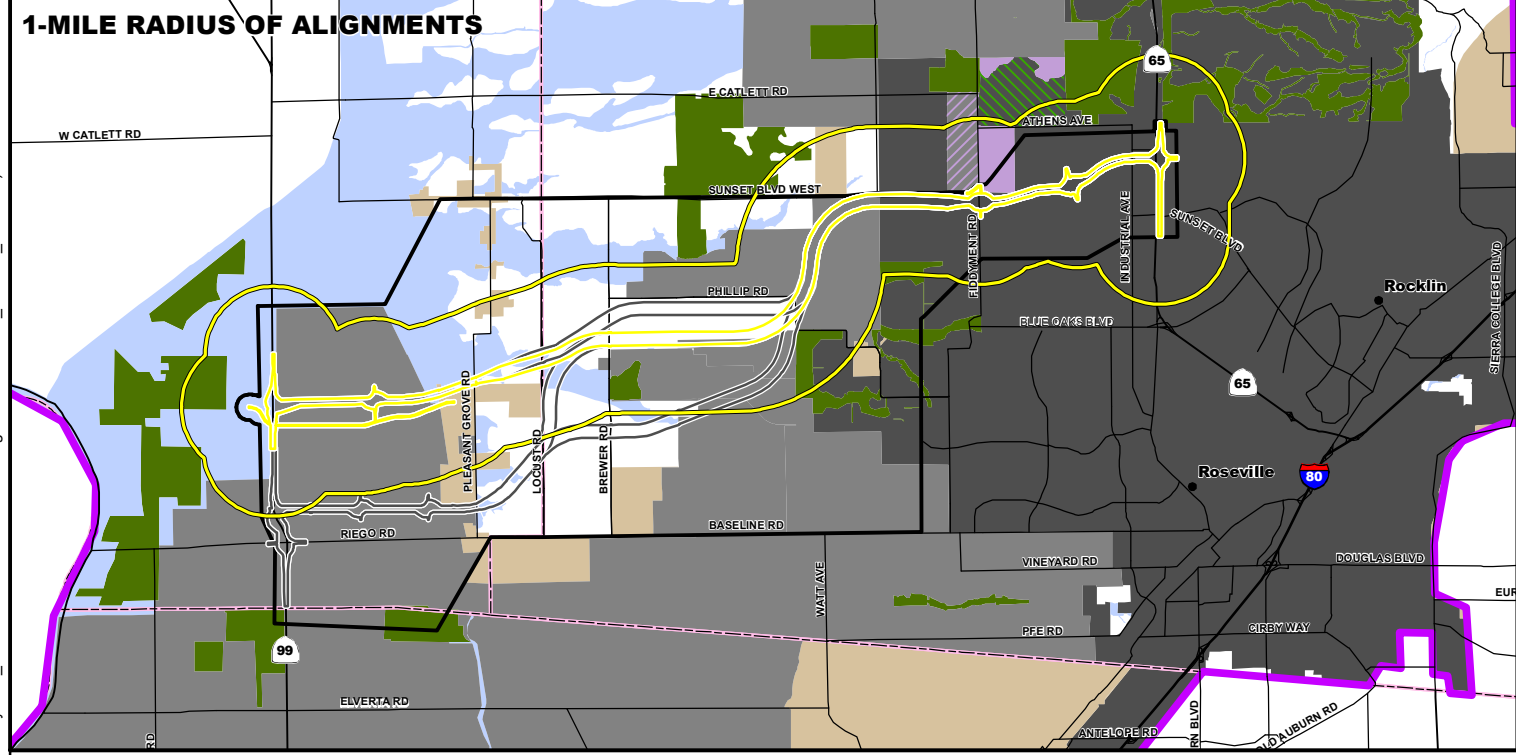


Map Document: U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\alt4\_landuse\_radial.mxd 4/8/2009 -- 10:29:32 AM KLawrence

**1-MILE RADII OF INTERCHANGES**



**1-MILE RADIUS OF ALIGNMENTS**



Existing Conservation Areas	100-Year Floodplain	Alternative 4	Radii of Alignments	Potential Interchanges	<b>Radii of Interchanges</b>	Developed or Constrained Land
Developed Unincorporated Areas	Proposed Landfill Expansion	Other Alternatives	Study Area for Secondary and Indirect Impacts	Hypothetical Interchanges	Conceptual Interchange	Undeveloped Land
Municipal Facilities	Pending Conservation Area	Project Study Area Boundary	Conceptual Interchanges		Potential Interchange (Watt Avenue)	
Planned/Proposed Development	County Boundary				Hypothetical Interchange	
Existing and Approved Development	City/Town					

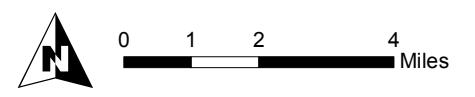
Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville



TIER 1 EIS/EIR

**Land Use by Type within 1 Mile, Alternative 4**

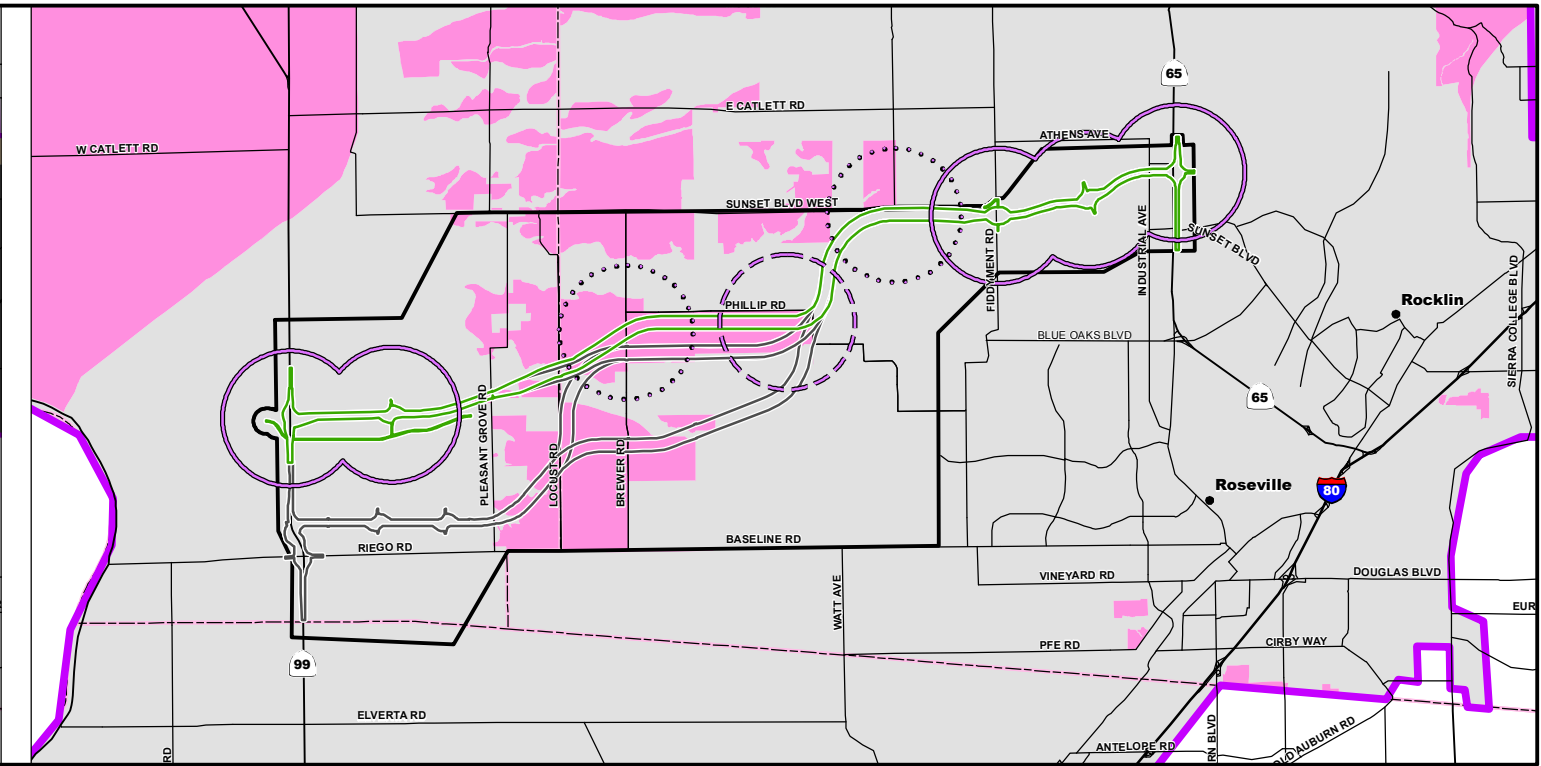
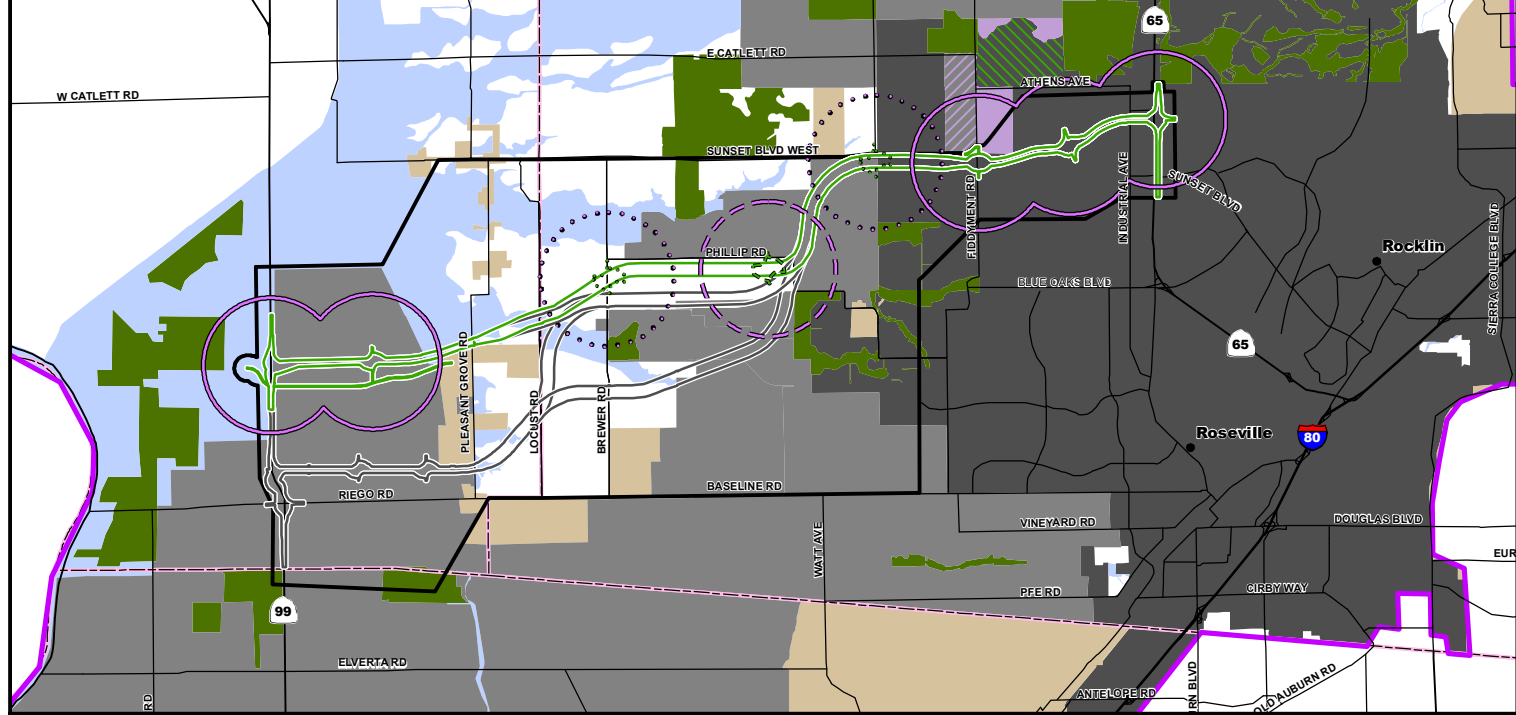


**Figure G-9 (revised)**

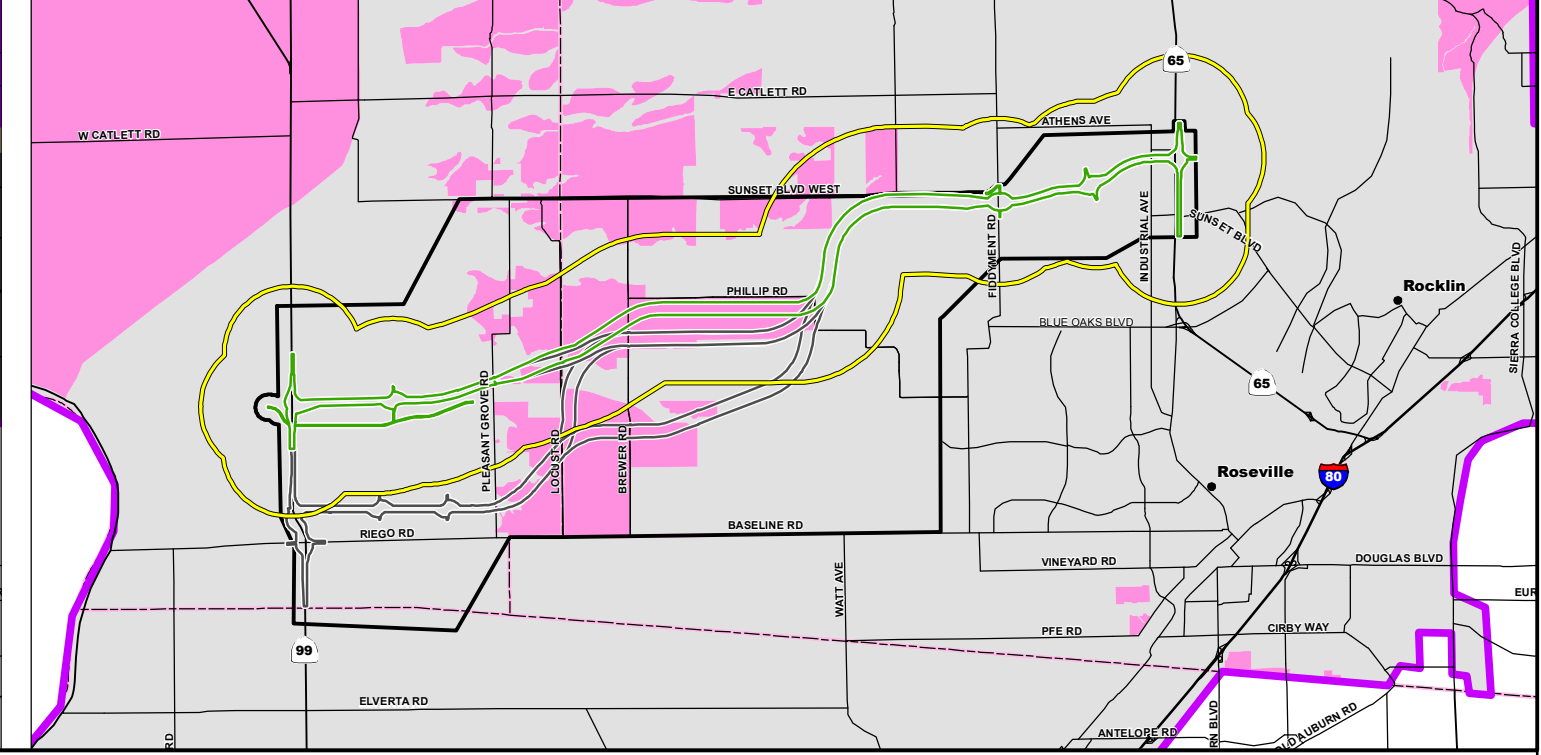
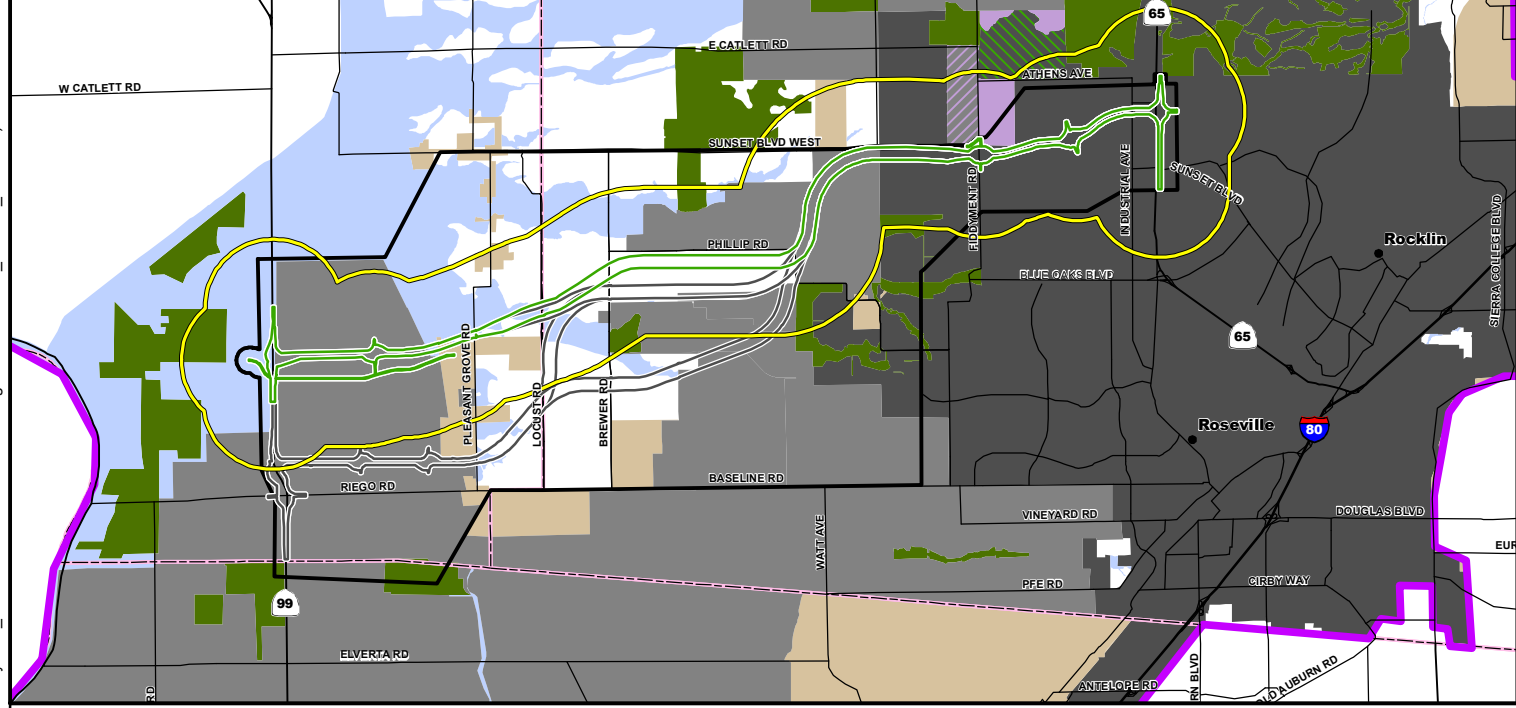
April 2009

Map Document: U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\alts\_landuse\_radii.mxd 4/8/2009 -- 10:35:17 AM KLawrence

**1-MILE RADII OF INTERCHANGES**



**1-MILE RADIUS OF ALIGNMENTS**



Existing Conservation Areas	100-Year Floodplain	Alternative 5	Radii of Alignments	Potential Interchanges	<b>Radii of Interchanges</b>	Developed or Constrained Land
Developed Unincorporated Areas	Proposed Landfill Expansion	Other Alternatives	Study Area for Secondary and Indirect Impacts	Hypothetical Interchanges	Potential Interchange (Watt Avenue)	Undeveloped Land
Municipal Facilities	Pending Conservation Area	Project Study Area Boundary	Conceptual Interchanges		Hypothetical Interchange	
Planned/Proposed Development	County Boundary					
Existing and Approved Development	City/Town					

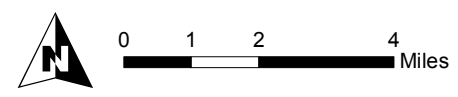
Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.

Source: North Fork Associates; Mara Feeny Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville



TIER 1 EIS/EIR

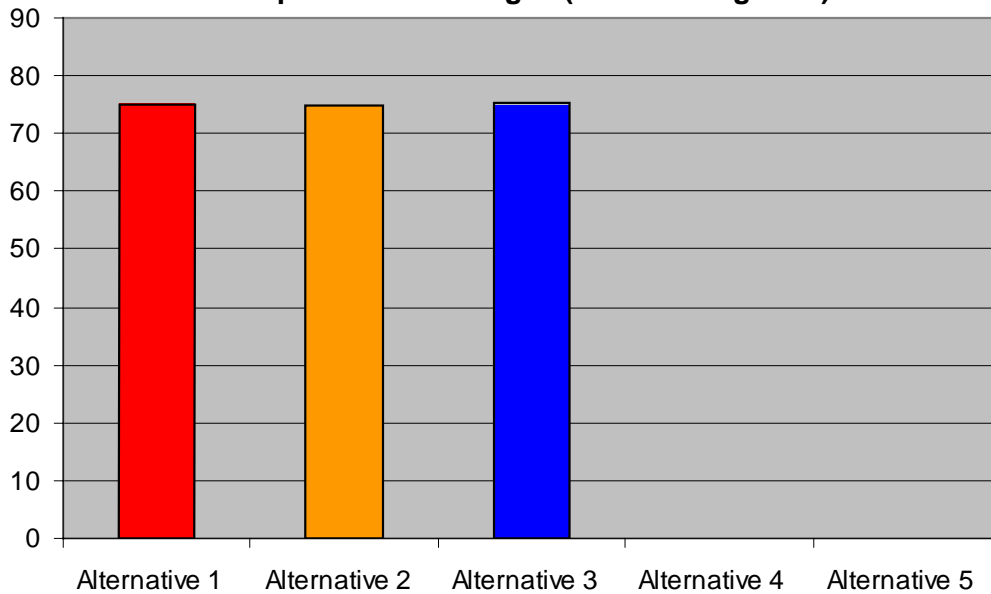
**Land Use by Type within 1 Mile, Alternative 5**



**Figure G-10 (revised)**

April 2009

### Proposed Interchanges (Western Segment)



Source: Mara Feeney & Associates, Dec. 2007



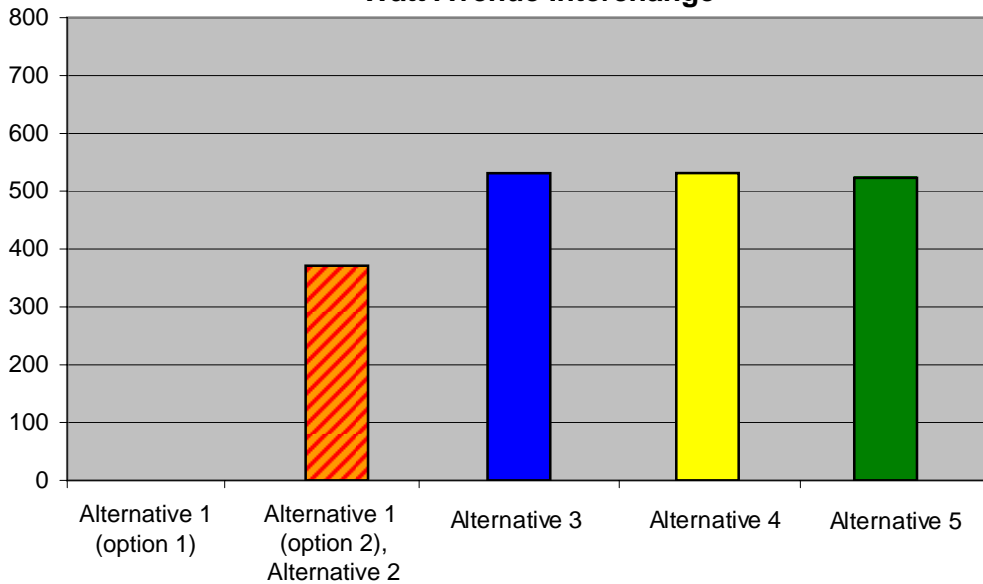
Tier 1 EIS/EIR

Acres of Potentially Developable Land Within 1 Mile of Proposed Western Segment Interchanges

Figure G-11

April 2009

### Watt Avenue Interchange



Source: Mara Feeney & Associates, Dec. 2007



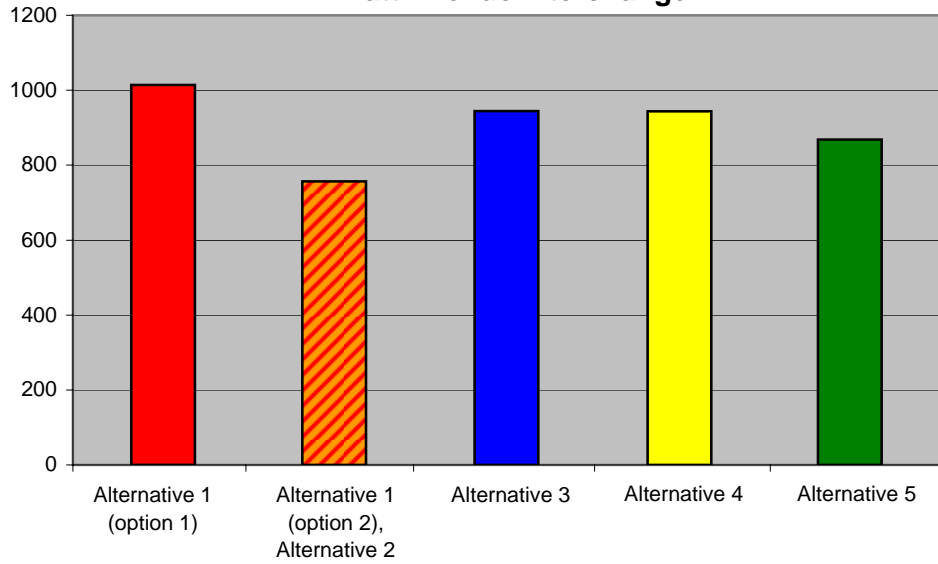
Tier 1 EIS/EIR

Acres of Potentially Developable Land Within 1 Mile of Potential Watt Avenue Interchange

Figure G-12 (Revised)

April 2009

### Watt Avenue Interchange



Source: Mara Feeney & Associates, Dec. 2007



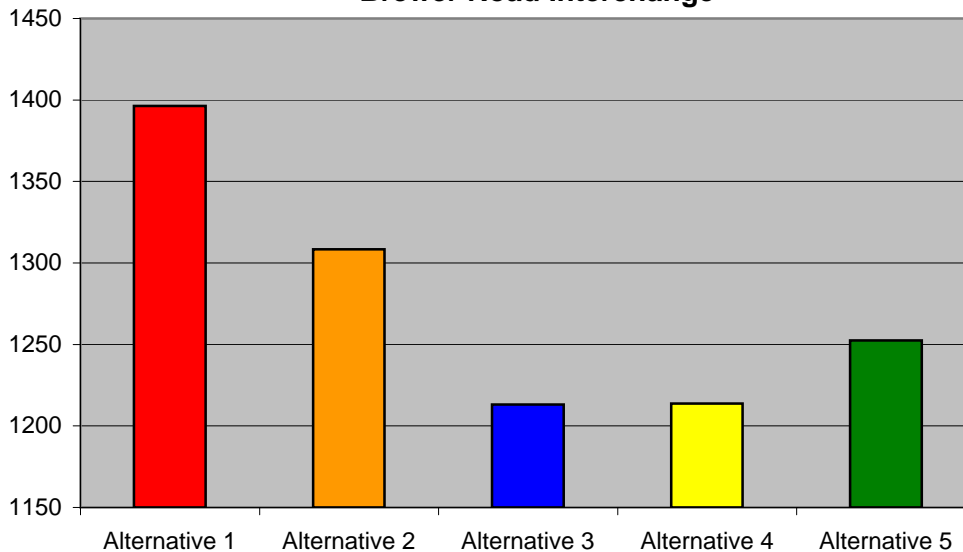
Tier 1 EIS/EIR

Acres of Potentially Developable Land Within  
1 Mile of Watt Avenue Interchange  
(Variant B)

Figure G-13  
(Revised)

April 2009

### Brewer Road Interchange



Source: Mara Feeney & Associates, Dec. 2007

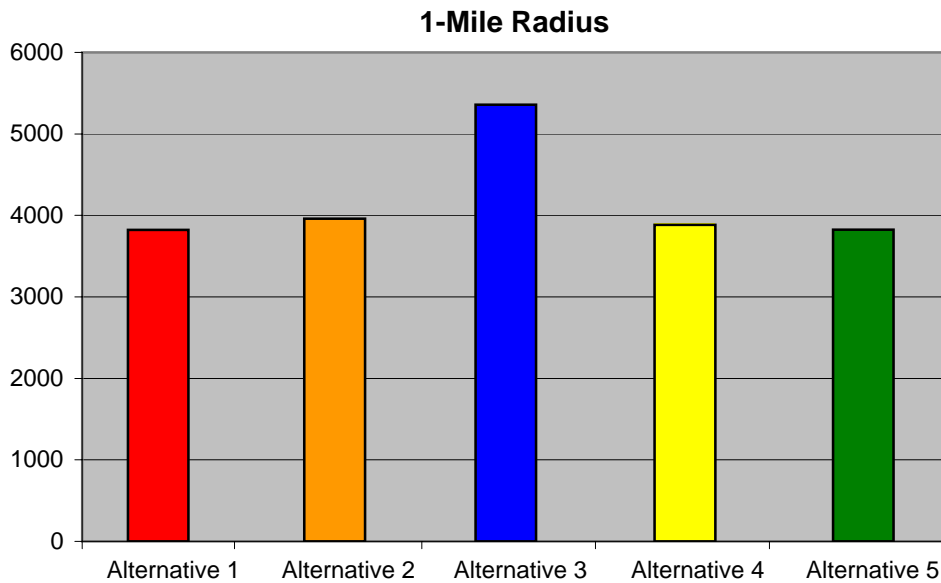


Tier 1 EIS/EIR

Acres of Potentially Developable Land Within  
1 Mile of Brewer Road Interchange  
(Variant A)

Figure G-14  
(Revised)

April 2009



Source: Mara Feeney & Associates, Dec. 2007

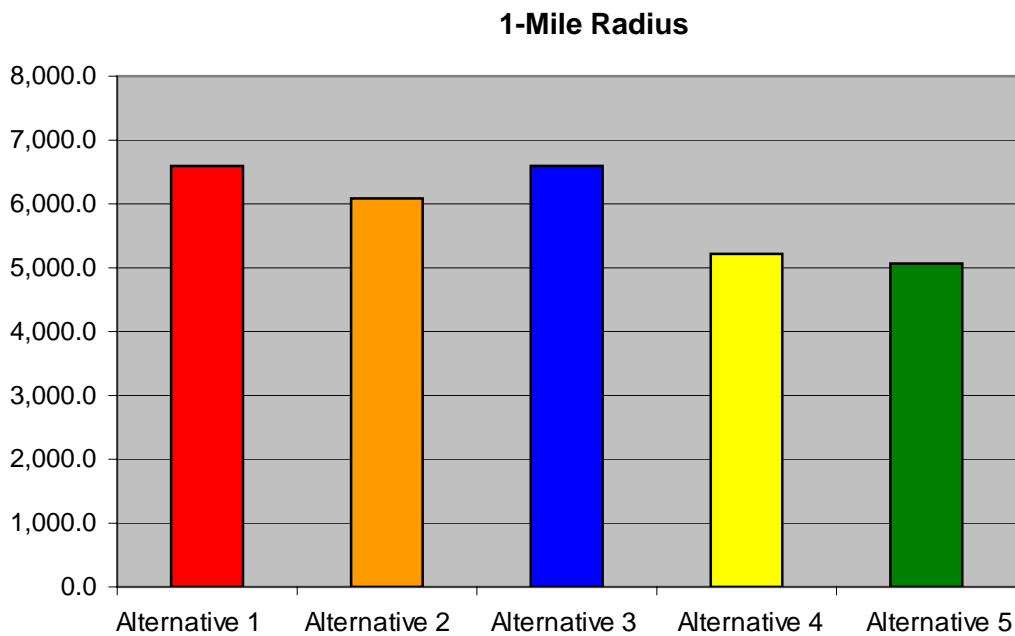


Tier 1 EIS/EIR

Acres of Potentially Developable Land Within  
1 Mile of Entire Alignment  
(Variant A)

Figure G-15  
(Revised)

April 2009



Source: Mara Feeney & Associates, April 2008

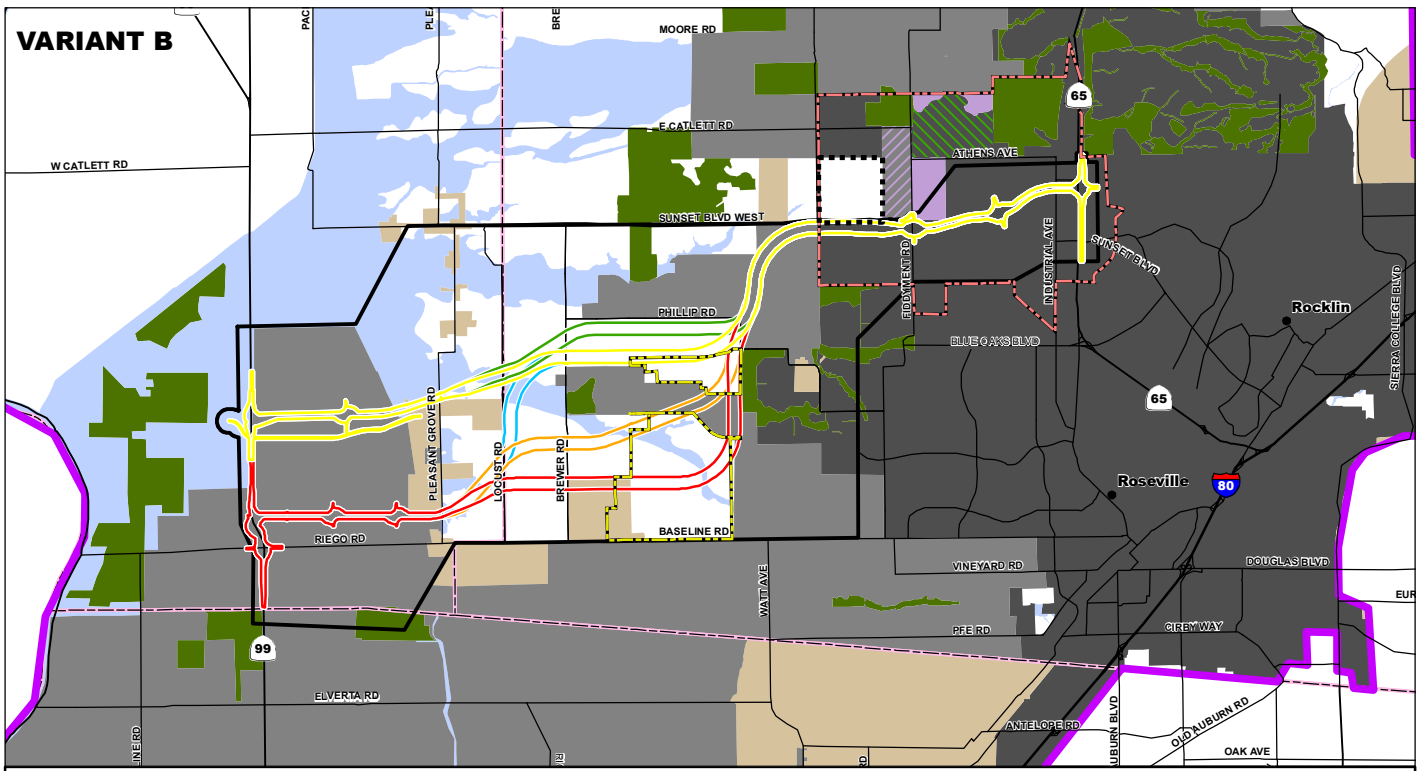
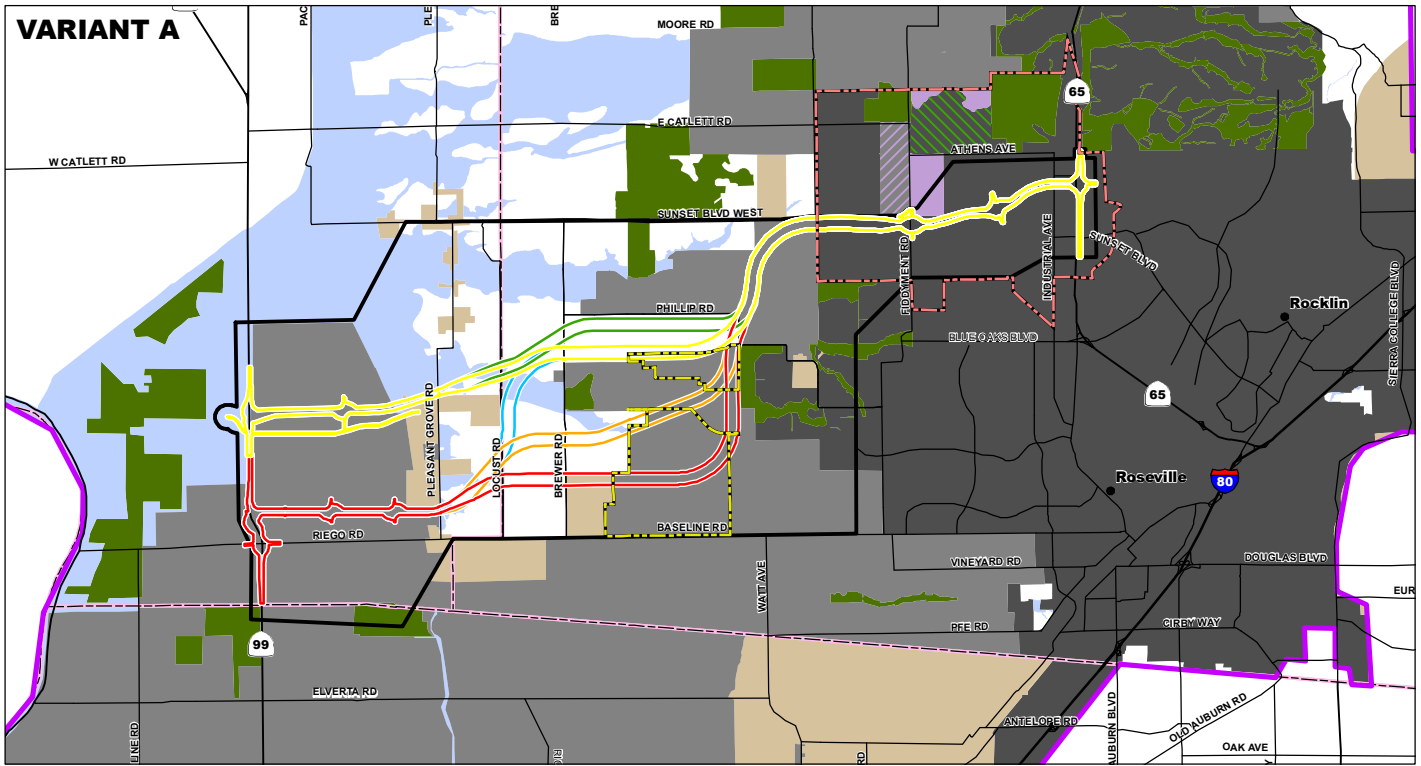


Tier 1 EIS/EIR

Acres of Potentially Developable Land Within  
1 Mile of Entire Alignment  
(Variant B)

Figure G-16  
(Revised)

April 2009



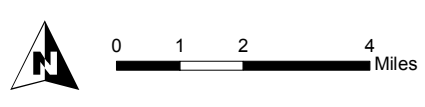
Existing Conservation Areas	100-Year Floodplain	Alternative 1	Study Area for Secondary and Indirect Impacts
Developed Unincorporated Areas	Proposed Landfill Expansion	Alternative 2	Project Study Area Boundary
Municipal Facilities	Pending Conservation Area	Alternative 3	Curry Creek Community Plan Boundary
Planned/Proposed Development	County Boundary	Alternative 4	Sunset Industrial Area Plan (SIAP) Boundary
Existing and Approved Development	City/Town	Alternative 5	Undeveloped Portion of SIAP, designated as AG (80-acre minimum)

Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.



TIER 1 EIS/EIR

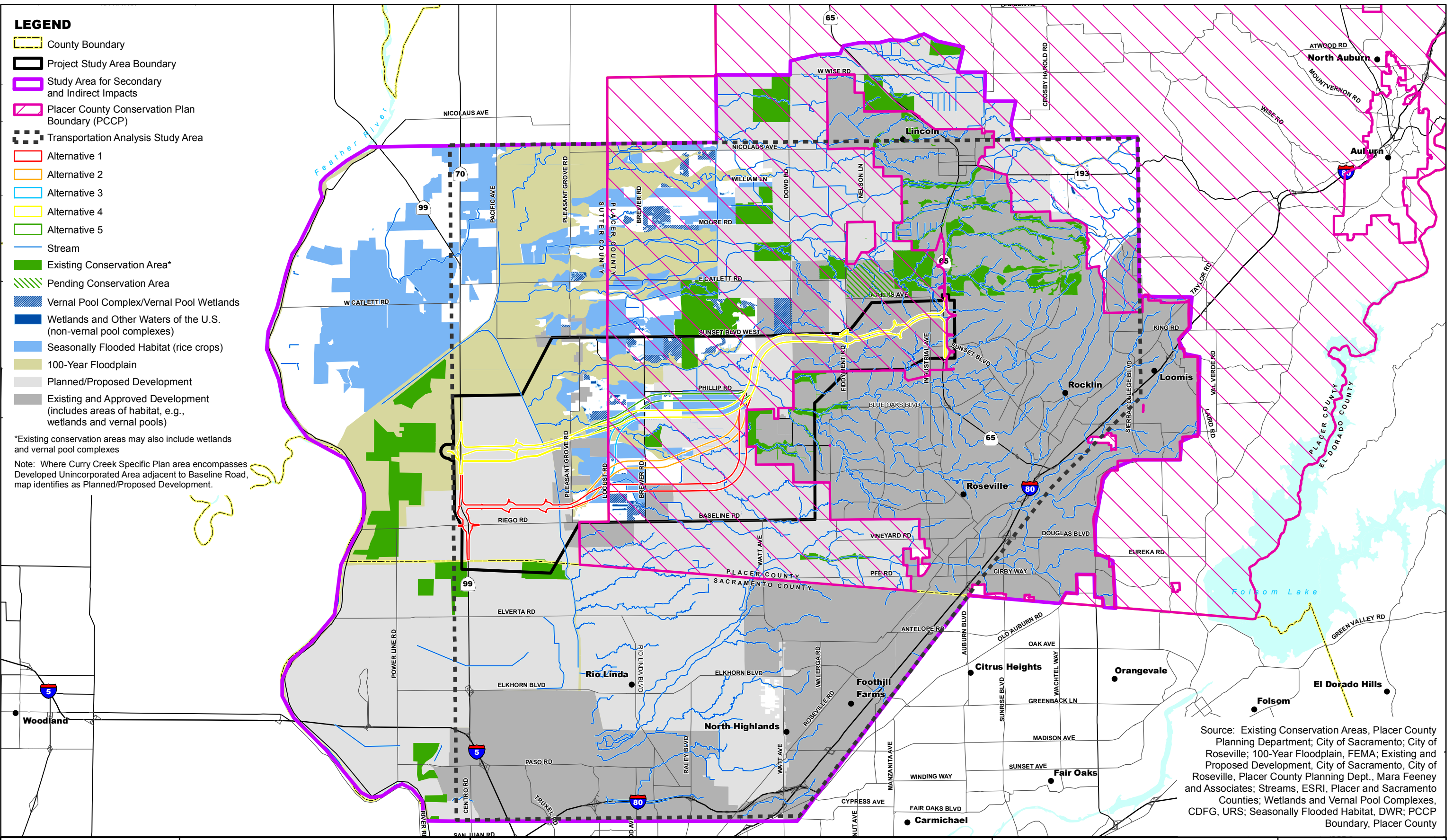
## Variant A and Variant B



**Figure G-17**  
*(revised)*

**April 2009**

Map Document: U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\habitat\_connectivity.mxd 4/8/2009 -- 10:47:29 AM KLawrence



- LEGEND**
- County Boundary
  - Project Study Area Boundary
  - Study Area for Secondary and Indirect Impacts
  - Placer County Conservation Plan Boundary (PCCP)
  - Transportation Analysis Study Area
  - Alternative 1
  - Alternative 2
  - Alternative 3
  - Alternative 4
  - Alternative 5
  - Stream
  - Existing Conservation Area\*
  - Pending Conservation Area
  - Vernal Pool Complex/Vernal Pool Wetlands
  - Wetlands and Other Waters of the U.S. (non-vernal pool complexes)
  - Seasonally Flooded Habitat (rice crops)
  - 100-Year Floodplain
  - Planned/Proposed Development
  - Existing and Approved Development (includes areas of habitat, e.g., wetlands and vernal pools)
- \*Existing conservation areas may also include wetlands and vernal pool complexes
- Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Planned/Proposed Development.

Source: Existing Conservation Areas, Placer County Planning Department; City of Sacramento; City of Roseville; 100-Year Floodplain, FEMA; Existing and Proposed Development, City of Sacramento, City of Roseville, Placer County Planning Dept., Mara Feeney and Associates; Streams, ESRI, Placer and Sacramento Counties; Wetlands and Vernal Pool Complexes, CDFG, URS; Seasonally Flooded Habitat, DWR; PCCP Boundary, Placer County



TIER 1 EIS/EIR

Secondary and Indirect Impact Analysis Study Area/  
PCCP Conservation Area

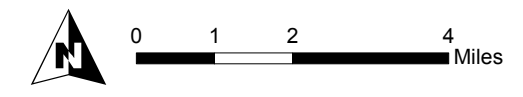
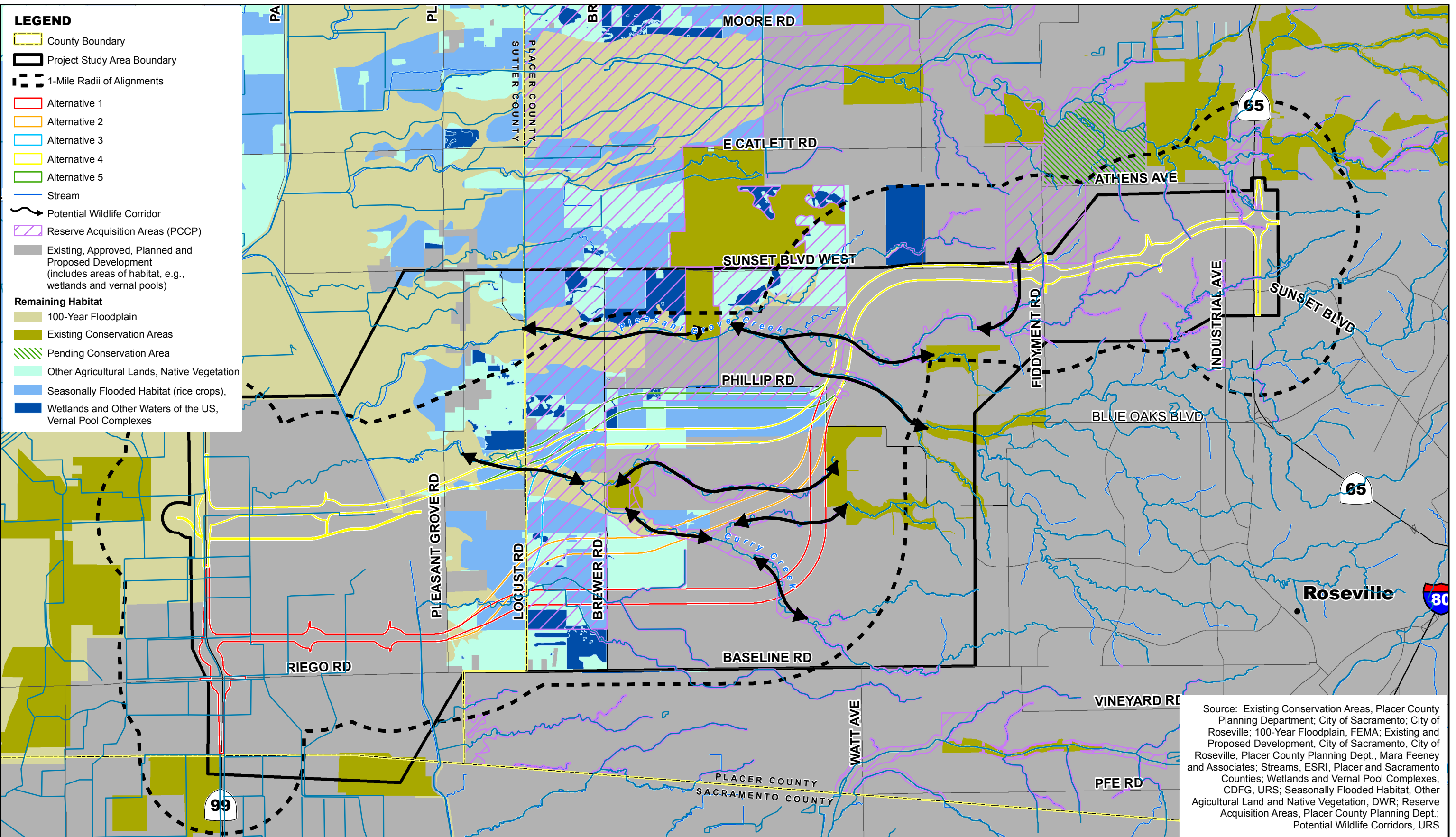


Figure G-25 (revised)

April 2009

Map Document: U:\GIS\Placer\_Parkway\Placer\_Parkway2007\_280666951\MXD\Current Working Documents\habitat\_zoomed.mxd 4/9/2009 -- 10:51:10 AM KLawrence



Source: Existing Conservation Areas, Placer County Planning Department; City of Sacramento; City of Roseville; 100-Year Floodplain, FEMA; Existing and Proposed Development, City of Sacramento, City of Roseville, Placer County Planning Dept., Mara Feeny and Associates; Streams, ESRI, Placer and Sacramento Counties; Wetlands and Vernal Pool Complexes, CDFG, URS; Seasonally Flooded Habitat, Other Agricultural Land and Native Vegetation, DWR; Reserve Acquisition Areas, Placer County Planning Dept.; Potential Wildlife Corridors, URS



TIER 1 EIS/EIR

Habitat Connectivity

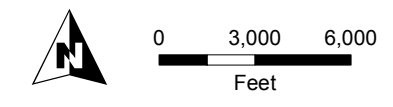


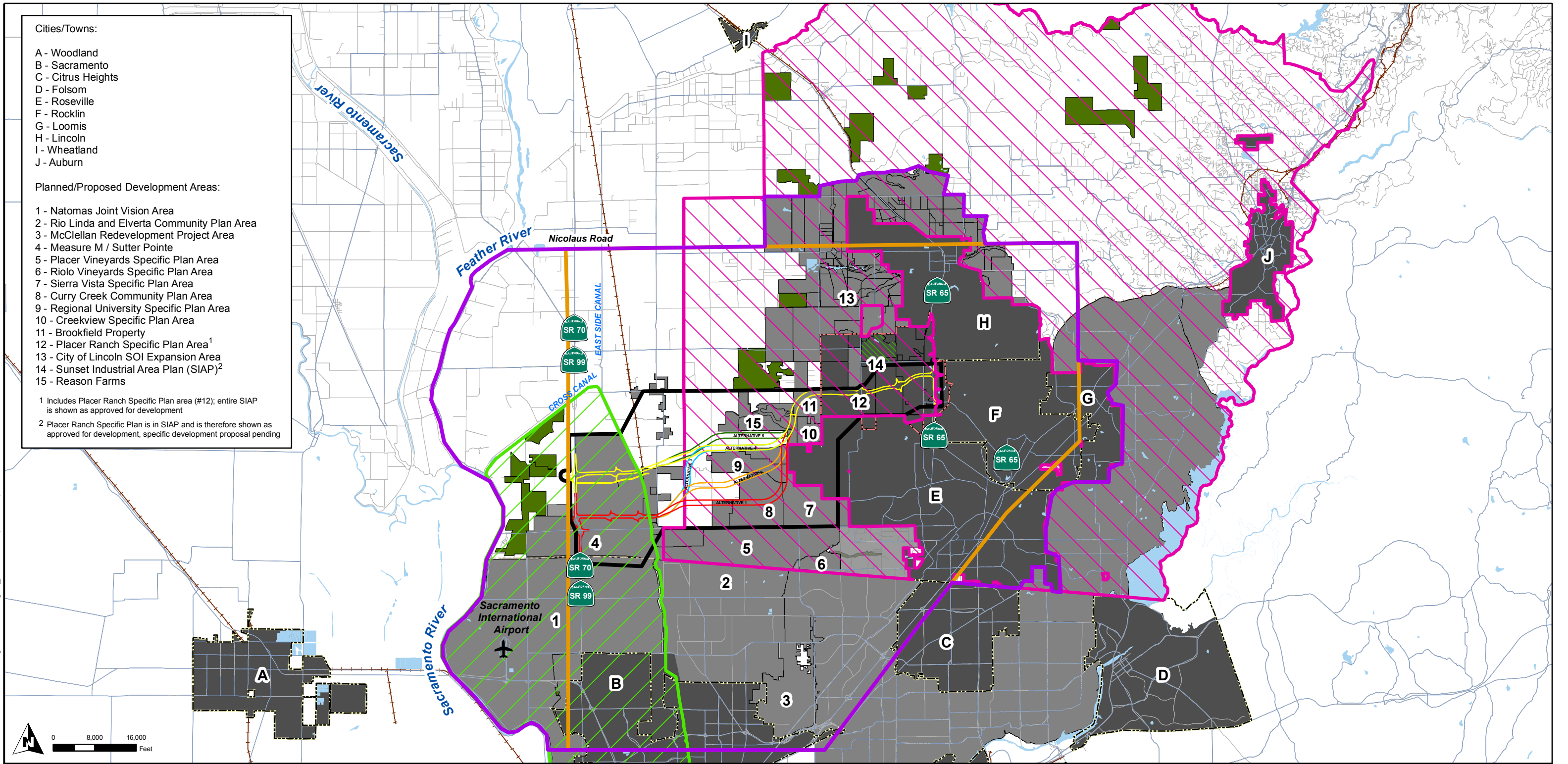
Figure G-26

April 2009



Map Document: (U:\GIS\Placer\_Parkway\PlacerParkway2007\_28066595\MXD\Current Working Documents\FigC1\_cumulativeimpacts.mxd, 4/8/2009 - 10:57:49 AM KLawrence

- Cities/Towns:**
- A - Woodland
  - B - Sacramento
  - C - Citrus Heights
  - D - Folsom
  - E - Roseville
  - F - Rocklin
  - G - Loomis
  - H - Lincoln
  - I - Wheatland
  - J - Auburn
- Planned/Proposed Development Areas:**
- 1 - Natomas Joint Vision Area
  - 2 - Rio Linda and Elverta Community Plan Area
  - 3 - McClellan Redevelopment Project Area
  - 4 - Measure M / Sutter Pointe
  - 5 - Placer Vineyards Specific Plan Area
  - 6 - Riolo Vineyards Specific Plan Area
  - 7 - Sierra Vista Specific Plan Area
  - 8 - Curry Creek Community Plan Area
  - 9 - Regional University Specific Plan Area
  - 10 - Creekview Specific Plan Area
  - 11 - Brookfield Property
  - 12 - Placer Ranch Specific Plan Area<sup>1</sup>
  - 13 - City of Lincoln SOI Expansion Area
  - 14 - Sunset Industrial Area Plan (SIAP)<sup>2</sup>
  - 15 - Reason Farms
- <sup>1</sup> Includes Placer Ranch Specific Plan area (#12); entire SIAP is shown as approved for development
- <sup>2</sup> Placer Ranch Specific Plan is in SIAP and is therefore shown as approved for development, specific development proposal pending



City Boundary	Alternative 1	Alternative 4	Transportation Analysis Study Area (TASA)	Natomas Habitat Conservation Plan Boundary	Sunset Industrial Area
County Boundary	Alternative 2	Alternative 5	Planned / Proposed Development (includes existing conservation areas)	Proposed Placer County Conservation Plan/Western Placer Area Boundary (PCCP)	Existing Conservation Areas outside areas of Planned / Proposed, Existing and Approved Development
Railroads	Alternative 3	Project Study Area Boundary	Existing and Approved Development (includes existing conservation areas)	Study Area for Cumulative Impacts	Pending Conservation Area

Source: North Fork Associates; Mara Feeney Associates; Sutter County Planning Division; County of Sacramento Planning and Community Development Department; City of Sacramento Development Services Department; Sunset Industrial Area Plan; City of Lincoln Community Development Department; Natomas Basin HCP; Placer County Planning Department; City of Sacramento; City of Roseville

Note: Where Curry Creek Specific Plan area encompasses Developed Unincorporated Area adjacent to Baseline Road, map identifies as Curry Creek Specific Plan.



TIER 1 EIS/EIR

## Cumulative Impacts Study Area – Wetlands and Vernal Pools

Figure G-27 (revised)

April 2009

**5.0**  
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## **5.0 LIST OF PREPARERS AND REVIEWERS**

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**6.0**  
**LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM**  
**COPIES ARE SENT**





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California Energy Commission

California Integrated Waste Management Board

California Native American Heritage Commission

California State Lands Commission

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City of Lincoln Public Works Department

City of Rocklin Planning Department

City of Rocklin Public Works Department

City of Roseville Planning Department

City of Roseville Public Works Department

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City of Sacramento Planning Department

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Faith Malcolm, Elverta, California

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Greg Bates, American Basin Council of Watersheds

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Headquarters, California Department of Water Resources

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Meghan West, Roseville, California

Mel Borgman, Pleasant Grove, California

Michael Johnson, Placer County Planning Department

Michael Miller, The Ferguson Group LLC

Michael Woods, Roseville, California

Michelle Tovar, U.S. Fish & Wildlife Service

Mike McKeever, SACOG

Mike Wiley, Sacramento Regional Transit

Moses Stiles, Public Utilities Commission

Nancy Haley, U.S. Army Corps of Engineers - Sacramento District

Nancy Levin, U.S. Environmental Protection Agency, Region 9

Nela Luken, City of Roseville Planning Department

Nevada County Community Development Agency, Planning Department

Nova Blazej, U.S. Environmental Protection Agency, Region 9

Resident, 3325 Amoruso Way, Roseville, California

Office of Emergency Services

Office of Historic Preservation, California Department of Parks and Recreation

Olga Widnes, Roseville, California

Orley Anderson, Rocklin, California

P. & A. Maslov, Roseville, California

Paul Devereux, Reclamation District No. 1000

Paul Richardson, City of Roseville Planning Department

Peter Burke, Elverta, California

Phil Zeitman, Roseville, California

Phillip T. Vassion, Placer County Department of Public Works, Transportation Division

Placer County Library

Placer County Library, Loomis

Placer County Library, Rocklin

Placer County Planning Department

Placer County Public Works Department

Protecting Earth and Animals with Compassion and Education (PEACE)

R. & B. Pronovost, Roseville, California

R. & C. Pitkin, Roseville, California

R. & G. Fabbre, Roseville, California

R. & W. Eckroat, Roseville, California

R. Karlson, Roseville, California

Raul Holguin, Roseville, California

Richard Moorehead, Placer County Public Works, Transportation Division

Rick Dondro, Placer County Public Works Department

Rick Ward, California Highway Patrol

Rob Jensen, City of Roseville Public Works Department

Robert Harmony, Pleasant Grove, California

Robert Sherry, Sacramento County Planning & Community Development Department

Rodney Campbell, City of Lincoln

Roseville Public Library, Downtown

Roseville Public Library, Maidu

Roy and Barbara Jackson, Pleasant Grove, California

S. & F. Newth, Roseville, California

S. Malone, Oroville, California

Sacramento Area Office, U.S. National Oceanic and Atmospheric Administration

Sacramento County Library, North Highlands - Antelope

Sacramento County Library, North Natomas

Sacramento County Planning Department

Sacramento County Public Library



Sacramento County Public Works Department

Scott Finley, Placer County County Counsel

Shane M. Vaughn, Roseville, California

Sierra College Library

Stacey McKinley, The McKinley Group

State Water Resources Control Board, Division of Clean Water Programs

State Water Resources Control Board, Division of Water Quality

State Water Resources Control Board, Division of Water Rights

Steve Palmer, City of Lincoln Public Works Department

Steve Peterson, City of Sacramento - Planning & Building

Sutter County Library, Browns Branch

Sutter County Library, Main Branch

Sutter County Library, Pleasant Grove Branch

Sutter County Planning Department

Sutter County Public Works Department

T. & J. Peterson, Roseville, California

T. & T. Miskel, Roseville, California

Terry Davis, Placer Group Sierra Club - Mother Lode Chapter

Terry Richardson, City of Rocklin

Terry Roberts, Office of Planning and Research - State Clearinghouse

Terry Schutten, Sacramento County

Thomas M. Miller, Placer County Executive Officer

Timothy D. Taron, Hefner, Stark & Marois, LLP, on behalf of KT Communities

Tom and F. Renee Laffey, Roseville, California

Tom McClintock, U.S. Representative

Town of Loomis Planning Department

Town of Loomis Public Works Department

W. & L. Seifert, Rocklin, California

W. & L. Seifert, Roseville, California

W. Sigl, Roseville, California

Wendy Lee Decker, Roseville, California

Will Dickinson, Placer County Department of Facilities Services

Woodland Community Development Department

Yushuo Chang, Placer County Air Pollution Control District

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## 7.0 REFERENCES

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**APPENDIX A**  
**MODIFIED NEPA/404 PROCESS**





**APPENDIX A  
MODIFIED NEPA/404 PROCESS**

- Appendix A1**      **Modified NEPA/404 Process Memorandum of Understanding**
- Appendix A2**      **Agency Concurrence Letters**
- Appendix A3**      **Terms of a No-Access Easement for the Buffer Area Adjacent  
to Placer Parkway**
- Appendix A4**      **Summaries of Meetings Since June 2007**



**Appendix A1**  
**Modified NEPA/404 Process Memorandum of Understanding**



Modification of the "National Environmental Policy Act/Clean Water Act  
Section 404 Integration Process for Surface Transportation Projects  
Memorandum of Understanding (NEPA/404 MOU)"<sup>1</sup>  
for application to  
the Placer Parkway Corridor Preservation Project  
April 12, 2004

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The NEPA/404 MOU integrates requirements of the Clean Water Act Section 404 permit process into the NEPA environmental review. This integration facilitates the preparation of the Section 404 permit application at the end of the NEPA process. While a Tier 1 evaluation will not result in a Section 404 permit application, the associated Tier 2 project will require a permit. Therefore, the NEPA/404 process is modified for Tier 1 to reflect decisions made at Tier 1, and to anticipate the permit application requirements at Tier 2. The NEPA/404 process for Tier 2 will follow the standard procedure outlined in Appendix A of the NEPA/404 MOU.

The goal of the modified NEPA/404 process for Tier 1 is to ensure that Tier 1 decisions reflect careful consideration of the 404(b)(1) Guidelines (40 CFR 230), which are binding, substantive regulations implementing the Clean Water Act. The Guidelines should be addressed as early as possible in the Tier 1 NEPA evaluation to eliminate the need to revisit decisions in Tier 2 that might otherwise conflict with 404 permit requirements.

The Tier 1 (modified) and Tier 2 (standard) NEPA/404 processes are similar in many respects. Both Tier 1 and Tier 2 NEPA/404 include five concurrence points<sup>2</sup>. The main difference between Tier 1 and Tier 2 NEPA/404 processes are the last two concurrence points. In Tier 2, the project proponent seeks agency concurrence on the "least environmentally damaging practicable alternative"(LEDPA) and the conceptual mitigation plan for the LEDPA. In Tier 1, however, the project proponent seeks agency concurrence on the alternative (corridor) *most likely to contain the LEDPA*, and on the *general framework* for mitigation. All other elements of the standard NEPA/404 process apply, unless otherwise indicated.

The Tier 1 modified NEPA/404 process includes five concurrence points:

1. Purpose and Need
2. Criteria for Selecting the Range of Alternatives
3. Range of Alternatives
4. Alternative(s) most likely to contain the LEDPA
5. Mitigation Framework

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<sup>1</sup>Signed by Federal Highway Administration, Federal Transit Administration, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Transportation, Arizona Department of Transportation, Nevada Department of Transportation (1993).

<sup>2</sup>Concurrence/Non-Concurrence is described in Section VI of the NEPA/404 MOU.

These concurrence points are sequential, each one building upon and consistent with previous concurrences. Concurrence points #1 to #3 occur prior to completion of the Tier 1 Draft EIS. Concurrence points #4 and #5 occur prior to completion of the Tier 1 Final EIS. The NEPA/404 signatory agencies may agree to bundle concurrence points for purposes of review.

#### Concurrence Point #1: Purpose and Need

The Council on Environmental Quality regulations implementing NEPA call for a statement of purpose and need (40 CFR 1502.13). The Section 404(b)(1) Guidelines include a basic purpose (40 CFR 230.10(a)(3)) and an overall project purpose (40 CFR 230.10(a)(2)). For NEPA/404 integration, one statement of purpose and need should be developed to meet all requirements.

The NEPA purpose and need statement briefly specifies the underlying purpose and need of the proposed project. The NEPA document should explain the project need, and demonstrate the project's logical termini and independent utility.

The Section 404(b)(1) Guidelines basic purpose is a brief statement that assists regulators in determining whether a project is water-dependent. The overall project purpose is an elaboration of the basic purpose, and provides a more specific description of the purpose and need for the project.<sup>3</sup> The overall project purpose should be broad enough to allow for an appropriate range of alternatives that avoid special aquatic sites, as defined in the Section 404 (b)(1) Guidelines (40 CFR 230 Subpart E). "Avoidance alternatives" could include alternatives that do not require securing a new right-of-way, maximize use of existing infrastructure, implement congestion pricing, or adjust the project study area to include alignments that impact fewer aquatic resources.

#### Concurrence Point #2: Criteria for Selecting the Range of Alternatives

The project sponsor develops criteria for selecting a reasonable range of alternatives. If the number of potential alternatives generated is very large, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS.<sup>4</sup> The criteria can be used to screen out or narrow the range of alternatives that will be carried forward for analysis in the Draft EIS. For NEPA/404 MOU projects, environmental criteria should be applied so that each alternative can be ranked based on its impact to the aquatic ecosystem.

Two types of screening criteria that can be effective for Tier 1 decision making are "project purpose" and "fatal flaw" analyses. Under the Clean Water Act Section 404 (b)(1) Guidelines, an alternative may be eliminated from consideration in the Draft EIS if it does not meet the project purpose. Fatal flaws are unavoidable or unmitigatable impacts associated with an alternative that are so great that the project could never go forward.

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<sup>3</sup>For a discussion of basic purpose and overall project purpose, see Yocom, T.G., R.A. Leidy, and C.A. Morris. 1989. "Wetlands Protection Through Impact Avoidance: A Discussion of the 404(b)(1) Alternatives Analysis." *Wetlands*. Vol 9, No. 2, pages 283-297.

<sup>4</sup>Council on Environmental Quality's Questions and Answers about the NEPA Regulations, Question 1.b. (1981)

### Concurrence Point #3: Range of Alternatives

The Range of Alternatives includes those alternatives that will be evaluated in the Draft EIS. For NEPA/404 projects, the range should include alternatives that avoid and minimize impacts to waters of the U.S. to the greatest extent possible. The range can include reasonable alternatives not within the jurisdiction of the lead agency, and a no-action alternative (40 CFR 1502.14 (c) and (d)).

— Tier 1 DEIS Circulation and Public Comment Period —

### Concurrence Point #4: Alternative(s) most likely to contain the LEDPA

The U.S. Army Corps of Engineers cannot grant a CWA Section 404 permit to a Tier 2 preferred alternative that is not the LEDPA. Therefore, it is critical that any alternative likely to contain the LEDPA is not prematurely eliminated during the Tier 1 NEPA review. Although a Tier 1 landscape-level analysis may provide enough information to eliminate alternatives that would clearly have the *greatest* environmental impacts, the analysis may not be detailed enough to identify with certainty a *single* alternative that is likely to contain the LEDPA. If the Tier 1 analysis indicates that there are several alternatives likely to contain the LEDPA, and the lead agency does not want to prematurely eliminate any alternative likely to contain the LEDPA, then all of the alternatives likely to contain the LEDPA should be carried forward to Tier 2.

However, the lead agency can attempt to further narrow the range of alternatives likely to contain the LEDPA by performing additional analysis in Tier 1. Analytical tools could include:

- functional assessment of aquatic resources,
- photo-interpretation of aerial photos,
- spot surveys,
- delineations in selected areas of special significance,
- full delineation of waters of the U.S., or
- geo-referenced data points from delineations done for this or other projects.

If the lead agency chooses to eliminate in Tier 1 any alternative(s) likely to contain the LEDPA, there is a risk that the eliminated alternative(s) may need to be revisited in Tier 2.

### Concurrence Point #5 – Mitigation Framework

The Tier 1 mitigation framework will describe in general terms the processes that the project sponsor will use to maximize opportunities for successful mitigation, including long-term mitigation and management of resources. The framework should identify:

1. Mitigation options available for creation, restoration, enhancement and preservation of aquatic resources (e.g., land dedication, acquisition of conservation easements, in lieu fees for acquisition, mitigation banks), and potential mitigation sites.

2. Opportunities to build upon existing or planned conservation efforts of other agencies and non-governmental organizations for the purposes of protecting and restoring large, intact landscapes.
3. Institutions and instruments for long-term management of mitigation sites.

— *Tier 1 FEIS Circulation. Agency Comment Period. Tier 1 Record of Decision.* —

Note: It is presumed that the Tier 2 project will follow the standard NEPA/404 MOU process.



**Placer Parkway Corridor Preservation & Tier 1 EIS/EIR**  
**Excerpts from Final Meeting Notes**  
**April 12, 2004**

**Review Draft Modified NEPA/404 Process**

- A. Clarification of Intent of Modified NEPA/404 Process ("the process")
1. The purpose of the Modified NEPA/404 process for Tier 1 projects is to provide early direction/guidance to FHWA and PCTPA so that Tier 1 decisions for Placer Parkway reflect careful consideration of Clean Water Act Section 404(b)(1) Guidelines. It is intended to streamline the overall environmental review and 404 permitting process by avoiding the need to revisit alternatives eliminated in Tier 1 during the Tier 2 process.
  2. All parties have an interest in a sound defensible process, based on credible information and consistent with the laws and regulations they are authorized to uphold.
  3. With this modified process, EPA and Corps are trying to clarify the questions that need to be asked and answered in Tier 1, so that a LEDPA can be identified and concurred on in Tier 2. We are trying to anticipate the "sticky questions" that may arise, and have some upfront agreement on how we will address them. (Note: This modified process, had it been available, would have helped us avoid problems in some previous Tier 1 NEPA/404 projects).
  4. This proposal is not intended to turn a Tier 1 process into a Tier 2 (project-level) process. It is intended to provide enough certainty that alternatives eliminated in Tier 1 do not need to be revisited in Tier 2. It provides a decision-making framework and tools for further narrowing the range of alternatives in Tier 1 without prematurely eliminating the alternative likely to contain the LEDPA.
  5. EPA understands that PCTPA's Tier 1 objective is to identify a single corridor alternative (500' - 1,000' wide) within which a transportation facility can be located, so that right-of-way can be preserved/acquired, due to intense development pressures.
  6. At this point, still early in the process, the alternatives under consideration by PCTPA appear to have relatively similar, and significant, impacts to aquatic/environmental resources.
  7. EPA reminded the group that "tiering" under NEPA does not require that only one alternative be selected to advance to Tier 2. Multiple alternatives can, and often are, advanced to Tier 2.
  8. EPA and the Corps understand the reasons why PCTPA has chosen as its goal to identify a single alternative in Tier 1. EPA and the Corps cannot guarantee this outcome, and PCTPA cannot meet project's objective without it.
- B. Clarification of Project Description
1. FHWA pointed out that the term "alternative" can mean different things in a Tier 1 and Tier 2 context. In Tier 1, "alternative" may refer to a corridor (which could have multiple alignments), while in Tier 2, "alternative" would often mean a specific alignment.
  2. Alternatives identified in Tier 1 could undergo some modification in Tier 2: narrower/-wider/refinement of location, etc.
- C. Purpose and Need
1. Should be narrow enough to focus the range of alternatives, but broad enough so as not to preclude a reasonable range.
  2. The Tier 1 alternative(s) most likely to contain the LEDPA must meet the project's purpose and need; LEDPA is not defined by the one best meeting purpose and need.
  3. NEPA regulations do not preclude looking at alternatives outside of the Agency's control; purpose and need should not be so narrowly drawn that this is precluded.

Placer Parkway Corridor Preservation & Tier 1 EIS/EIR  
Excerpt from April 12, 2004 NEPA/404 Meeting Summary

- D. Clarification of NEPA/404 Decision-Making Process
1. The NEPA document must disclose all significant environmental impacts and so that decision-makers can make informed decisions. Significance = context + intensity.
  2. NEPA/404 process will consider all NEPA impacts (socioeconomic, EJ, Section 4(f), Section 106, special status species, etc.), but bias is to the aquatic environment. COE follows legislative mandate.
  3. Concern raised as to application of "practicable", i.e., economic feasibility, applicability of special NEPA considerations such as identified in #2 above, direction from elected officials. Agreed that there is no "bright line" as to a definition of "practicable." Context is important.
- E. Points Made Concerning Corridor Alternatives Analysis
1. Need to consider alternatives' role in directing and distributing growth, and the resulting potential impacts on resources, not just rate of growth.
  2. Placer County now considering a community plan for area south of Pleasant Grove Creek to county lines, coordinating with Placer Legacy NCCP/HCP and Placer Parkway processes. The Community Plan will be informed by and consistent with the NCCP/HCP Conservation Strategy (Draft, September 8, 2003). Speaks to EPA request at August 2003 meeting for a Placer County vision for western Placer County.
- F. Project Team's Comments on EPA April 1, 2004 letter
1. Letter, page 1, penultimate paragraph re "analysis may not be detailed enough to identify with certainty a single alternative that is likely to contain the LEDPA": discussed under Item IV.A above.
  2. Modified Process, Attachment to letter, page 3, first full paragraph including bullets
    - a. Concern raised about how much information is needed for Tier 1 determination? The Modified NEPA/404 process for Tier 1 does not call for a full Tier 2 project-level of analysis. However, PCTPA wishes to eliminate all but one alternative in Tier 1. If resource/regulatory agencies are to make commitments not to revisit alternatives eliminated in Tier 1, the resource/regulatory agencies must a clear basis for doing so. Agencies cannot provide concurrence unless it is clear that the alternatives eliminated in Tier 1 do not contain the LEDPA. This may require more than landscape-level information. Study area subject to prior GIS-level analyses related to development of two HCPs; results in substantial amount of data, already subject to federal agency review. Project team is looking forward to sharing this info with the agencies. Agencies cannot comment until they see the available documentation.
    - b. Will evaluate other options (e.g., use of improved existing infrastructure, light rail, congestion pricing, others). Project team's preference is to consider during Tier 1 so as not to carry forward into Tier 2 unless data show these alternatives are most likely to contain the LEDPA, and meet the project purpose and need.
    - c. Should we be considering a Tier 2 document at this time? Intense development pressure and ongoing planning efforts (NCCP/HCP and the Curry Creek Community Plan, other development proposals) require the identification of a corridor as soon as possible. Tier 2 would require significant additional information, especially for CEQA review, not available within available timing and funding constraints. For these reasons, PCTPA has chosen to go through a tiered process.
    - d. Could "fine tune" corridor during Tier 2. The corridor boundaries could be adjusted to

Placer Parkway Corridor Preservation & Tier 1 EIS/EIR  
Excerpt from April 12, 2004 NEPA/404 Meeting Summary

- avoid and minimize environmental resources.
3. Modified Process, Attachment to letter, page 3, Concurrence Point #5 – Mitigation Framework
    - a. FHWA cannot purchase land to preclude development, as it is not in their mandate to get involved in local planning and zoning decisions; can acquire land for transportation purposes only, including mitigation for direct impacts.
    - b. ACOE clarified that the language is only intended to apply to land required as mitigation for project impacts. For Tier 1, mitigation strategies should be discussed so as to avoid problems at later project stages. EPA noted that a detailed mitigation plan would not be required until the permit phase.
    - c. All referred to problems on prior projects, and that early consultation and awareness of mitigation requirements would help to reduce issues later in the process.
    - d. Clarified that the project can't mitigate to achieve LEDPA. LEDPA should be identified before compensatory mitigation for impacts.
    - e. Question raised as to "bundling" Concurrence Point #5 with Concurrence Point #4, if actual mitigation not to be identified in Tier 1. For now, agreed to leave as is, but to revisit when considering Concurrence Point #4.
  4. Agreed to Proposed Modification as presented in April 1, 2004 EPA letter and attachment, with these meeting notes memorialized as adjunct to it. No plans to further formalize with signatures.
- G. Upcoming New Guidance
1. Caltrans/FHWA/EPA are developing cumulative and indirect effects guidance. The project team expressed interest in receiving the guidance when it becomes available.
  2. NEPA/404 integration MOU is being revised. Will not be ready until end of this year or sometime next year. Until the revised NEPA/404 MOU is signed, we are using the current MOU.



**Appendix A2**  
**Agency Concurrence Letters**





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

March 7, 2005

Leland Dong  
Senior Transportation Engineer  
Federal Highway Administration  
650 Capitol Mall Suite 1-400  
Sacramento, CA 95814

Subject: Concurrence on the Purpose and Need Statement for the Placer Parkway Corridor Preservation Project in Placer County, California

Dear Mr. Dong:

We are writing in response to your letter of February 25, 2005 requesting EPA's concurrence on the Purpose and Need statement for the above-referenced project. This request is pursuant to the National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU) as modified for the Tier 1 Placer Parkway Corridor Preservation Project (April 12, 2004)<sup>1</sup>.

Concurrence on Purpose and Need

EPA concurs with the attached *Purpose and Need Statement – Concurrence Version (February 16, 2005)*. We appreciate FHWA's and the Placer County Transportation Planning Agency's (PCTPA) responsiveness to EPA's concerns with the Purpose and Need Statement. The brief project purpose (Section 2.1) reads:

"The goal of the Tier 1 phase of the proposed Placer Parkway project is to preserve a right-of-way for a proposed transportation facility that contributes to the ultimate project purpose. The ultimate purpose of the proposed Placer Parkway project is to reduce anticipated congestion on the local and regional transportation system and advance economic development goals in southwestern Placer County and south Sutter County."

EPA's major concern in reviewing this Purpose and Need Statement is its consistency with NEPA and the Clean Water Act (CWA) Section 404. As documented in the attached NEPA/404 modification, EPA seeks to ensure that decisions made at Tier 1 incorporate CWA Section 404 requirements so permitting can be streamlined at Tier 2. The Tier 1 Purpose and Need Statement should lead to a reasonable range of alternatives that meet the project purpose, and should not

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<sup>1</sup>Modification of the "National Environmental Policy Act/Clean Water Act Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding (NEPA/404 MOU)" for application to the Placer Parkway Corridor Preservation Project (April 12, 2004).

preclude alternatives that are likely to contain the “least environmentally damaging practicable alternative” (LEDPA) in Tier 2.

This Purpose and Need Statement allows for a wide range of alternatives that meet the ultimate project purpose. Alternatives could include “expanding existing roadways, a non-freeway facility, a Transportation System Management (TSM) alternative, a shorter Parkway alternative, or a combination of the aforementioned.” (Section 2.1.2) Also, while the project is located within Placer and Sutter Counties, it is intended to “improve regional accessibility for business and jobs in the project vicinity including access to SR 70/99 and the I-5 corridor in northern Sacramento County including access to the Sacramento airport.” (Section 2.1.3)

#### Next Steps and Key Considerations

The next step in the NEPA/404 integration process is FHWA’s request for concurrence from EPA and the U.S. Army Corps of Engineers (Corps) on: (1) the criteria for selection of the range of alternatives, and (2) the range of alternatives to be evaluated in the Draft Environmental Impact Statement (DEIS). These concurrence points are sequential, each one building upon and consistent with previous concurrences. However, the NEPA/404 signatory agencies may agree to bundle concurrence points for purposes of review.

We recognize the importance of this project to FHWA and PCTPA. In that regard, we want to take this opportunity to alert you to potential environmental issues that may arise later in the Tier 1 or Tier 2 process, and encourage you to address them as early as possible in your planning. To assist you in your development of the upcoming concurrence points and the DEIS, we are providing the following recommendations.

#### Criteria for Selection of the Range of Alternatives

Pursuant to the CWA Section 404 and the April 12, 2004 NEPA/404 modification, we recommend FHWA include selection criteria that incorporate CWA Section 404 requirements. The criteria should address not only direct impacts, but also secondary and cumulative impacts on the aquatic ecosystem, as these impacts can be even greater than the direct impacts of a new roadway in a developing rural landscape. It would also be appropriate to consider environmental criteria such as minimizing habitat fragmentation or alteration of hydrological processes.

#### Range of Alternatives

Analyzing a reasonable range of alternatives is required by regulations implementing NEPA and consistent with Section 404 of the Clean Water Act. We recognize that a Tier 1 project does not require a CWA Section 404 permit. However, the subsequent Tier 2 project could adversely affect waters of the United States (waters) including wetlands and require a CWA Section 404 individual permit from the Corps. The Federal Guidelines (Guidelines) promulgated under CWA Section 404(b)(1) require the selection of the LEDPA before a permit applicant can discharge dredged or fill material into jurisdictional waters. For non-water dependent uses, the Guidelines presume the existence of a practicable alternative that does not impact special aquatic sites (e.g., wetlands), and it is incumbent on the project proponent to rebut this presumption.



It is critical that CWA Section 404 permit requirements are anticipated at Tier 1 so that practicable alternatives with less impacts are not eliminated during the Tier 1 NEPA review. Therefore, we recommend that FHWA and PCTPA evaluate alternatives that avoid and minimize damage to aquatic resources (“avoidance alternatives”), including alternatives that utilize and upgrade existing transportation corridors. For example, avoidance alternatives may include upgrading existing roads, a non-freeway facility, a shorter parkway alternative, transit corridors and associated “transit villages,” a transportation system management alternative, or a combination of these alternatives.

We recommend pursuing an integrated approach to formulating avoidance alternatives that involves municipal agencies, resource agencies, and non-governmental organizations. Working with municipal agencies that control local and regional land-use decisions is essential to developing alternatives that minimize adverse environmental impacts and provide durable solutions to transportation problems.

#### Regional Land Use Development Context

The study area is expected to undergo extensive land use changes. Planned and proposed uses include residential developments, two universities, commercial/industrial developments, transportation improvements, and conservation efforts. As we discussed in our interagency meeting held January 25, 2005, the DEIS should describe and evaluate the proposed transportation facility in the context of reasonably foreseeable land use changes in western Placer County. For example, FHWA and PCTPA should consider the relationship of the proposed transportation facility to the County’s General Plan update, the West Roseville Specific Plan (and the annexation of Westpark/Fiddymont), the State’s proposed Lincoln Bypass project for SR-65, and the Federal *Draft Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon*.

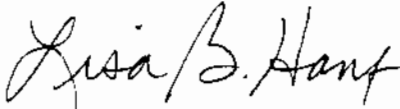
#### Mitigation Challenges

EPA anticipates that building a new alignment on the undeveloped landscape of southwestern Placer County and south Sutter County may cause or contribute to significant degradation of the aquatic ecosystem (e.g., vernal pools, riparian systems). We believe it will become increasingly difficult to identify and obtain land for CWA Section 404 mitigation in or near the study area. Already, Caltrans and private developers have reported to the EPA a shortage of available mitigation opportunities in Placer County to compensate for the unavoidable impacts of pending projects. We understand there are similar mitigation constraints in the adjacent counties of Butte and Sacramento, and “exporting” the compensatory mitigation for projects within Placer County might be opposed by the municipalities. Further, the project proponents would need to demonstrate to the federal regulatory agencies that off-site mitigation would be appropriate. We encourage FHWA and PCTPA to do everything possible to avoid and minimize potentially adverse impacts at Tier 1 to ensure streamlined permitting at Tier 2.

We appreciate the collaborative process that FHWA and PCTPA have established for this project. We are committed to continuing to work with you in that spirit, and look forward to discussing the next steps in the process at our next meeting. If you have any questions, please

contact Nancy Levin of my staff at 415-972-3848 or [levin.nancy@epa.gov](mailto:levin.nancy@epa.gov) or Erin Foresman of EPA's Wetlands Regulatory Office at 415-972-3396 or [foresman.erin@epa.gov](mailto:foresman.erin@epa.gov).

Sincerely,



Lisa B. Hanf, Manager  
Federal Activities Office

Enclosures

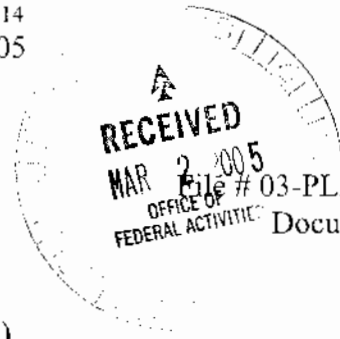
1. Purpose and Need Statement – Concurrence Version – Placer Parkway Corridor Preservation Tier 1 EIS/EIR – February 16, 2005
2. Modification of the “National Environmental Policy Act/Clean Water Act Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding (NEPA/404 MOU)” for application to the Placer Parkway Corridor Preservation Project (April 12, 2004).

cc: Tom Cavanaugh, U.S. Army Corps of Engineers  
Celia McAdam, Placer County Transportation Planning Agency  
John Webb, Caltrans North Region  
Steve Probst, Caltrans Local Assistance  
Ken Sanchez, U.S. Fish and Wildlife Service  
Michael Aceituno, National Oceanic and Atmospheric Administration Fisheries



U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
CALIFORNIA DIVISION  
650 Capitol Mall, Suite 4-100  
Sacramento, CA. 95814  
February 25, 2005

004251



IN REPLY REFER TO  
HDA-CA  
03-PLA-PARKWAY  
Document # P51928

Ms. Lisa Hanf, Chief Federal Activities Office (CMD-2)  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Dear Ms. Hanf:

The Federal Highway Administration (FHWA), the California Department of Transportation (Caltrans) and the Placer County Transportation Agency (PCPTA) are requesting your concurrence of the purpose and need Statement for the Placer Parkway in Placer County, as part of the NEPA/Section 404 Memorandum of Understanding with the FHWA, the Department, U.S. Army Corps of Engineers, Environmental Protection Agency and U.S. Fish and Wildlife Service.

The enclosed Purpose and Need statement is intended to be included in the Environmental Impact Statement/Environmental Impact Report for circulation to the public. The Purpose and Need statement dated February 16, 2005 was revised to address federal resource agency comments last dated February 1, 2005, as discussed at the Placer Parkway Coordination Meeting of January 25, 2005. Based on the comments received to the February 16, 2005 communication, the FHWA requests final concurrence from your agency on the Purpose and Need statement.

The FHWA, Caltrans, and PCPTA greatly appreciate your ongoing involvement in the Placer Parkway Corridor project. Following your formal agreement on the Purpose and Need, we look forward to working with you in the development of criteria for project alternative selection, and subsequently, the development and an analysis of project alternatives.

Sincerely,

For  
Gene K. Fong  
Division Administrator

Enclosure

**PURPOSE & NEED STATEMENT**

**CONCURRENCE VERSION**

**PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/EIR  
FEBRUARY 16, 2005**

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**CHAPTER 2 – PROJECT PURPOSE AND NEED**

**2.0 PURPOSE OF AND NEED FOR THE PROPOSED PROJECT**

**2.1 Purpose**

The goal of the Tier 1 phase of the proposed Placer Parkway project is to preserve a right-of-way for a proposed transportation facility that contributes to the ultimate project purpose. The ultimate purpose of the proposed Placer Parkway project is to reduce anticipated congestion on the local and regional transportation system and advance economic development goals in southwestern Placer County and south Sutter County.

The Placer Parkway's objectives are:

**2.1.1 Preserving Right-of-Way**

The purpose of the proposed action is to preserve right-of-way for a new or upgraded east-west connector between SR-65 and SR-70/99 serving cities and unincorporated areas across southwestern Placer County and south Sutter County. Planned and proposed development in the project vicinity has been accelerating over the last few years, and opportunities for building a new or upgraded connector may be lost unless action is taken now to preserve right-of-way for project construction.

**2.1.2 Responding to Existing and Anticipated Travel Demand**

The proposed Placer Parkway would be designed to reduce pressure on the existing transportation network and to address anticipated future congestion on the local roadway system in southwestern Placer County and south Sutter County. The proposed project would be designed to reduce total vehicle hours traveled (VHT) during the morning and evening peak commute periods (i.e., 6 to 9 AM and 3 to 6 PM), reduce the amount (VMT) and duration of travel that is spent in congested conditions in Southwestern Placer County, and improve travel times between the SR 65 corridor and SR 70/99 by maintaining a travel speed at or near the free flow speed of the Parkway, which on a freeway reflects LOS C to D conditions.<sup>1</sup>

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<sup>1</sup> Free flow speed and LOS C and D conditions on a freeway do not preclude an alternative based on: expanding existing roads, a non-freeway facility, a Transportation System Management (TSM) alternative, a shorter Parkway Alternative, or a combination of the aforementioned.

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## PURPOSE & NEED STATEMENT

### CONCURRENCE VERSION

#### PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/EIR FEBRUARY 16, 2005

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#### 2.1.3 Providing Access to the Regional Transportation System in Areas Planned or Projected for Job Growth

Placer Parkway would be designed to improve regional accessibility for businesses and jobs in the project vicinity including access to SR 70/99 and the I-5 corridor in northern Sacramento County including access to the Sacramento airport. With its controlled access, an objective of the proposed transportation facility would be to strike a balance among advancing planned job growth along the SR-65 and SR-70/99 corridors, avoiding urban growth inducement in areas not designated for development, and helping to preserve the rural character of southwestern Placer County and south Sutter County.

#### 2.2 NEED

The needs for the proposed project are discussed below. The ordering of the specific needs is not intended to imply a prioritization or order of importance.

##### 2.2.1 Need to Preserve Right-of-Way

The project vicinity includes some of the fastest growing communities in the Sacramento Metropolitan region -- Roseville, Rocklin, Lincoln and the Sunset Industrial Area. SACOG projects that the population in southwestern Placer County will nearly double between 2000 and 2025. Employment in the SR-65 high-technology corridor is expected to grow even faster than population. The anticipated development to support this increased population and employment will dramatically increase travel demand over the next 20 years and beyond.

The study area is under intense development pressure. Cities and counties are processing development applications and approving entitlement of new land uses in the study area. This is an ongoing process and the future of proposed land uses in the study area is not yet certain. However, given the ongoing environmental review of existing applications (including the Placer Vineyards Specific Plan and the West Roseville Specific Plan and Sphere of Influence Annexation Area), the number of recent applications or pre-application submittals, and interest by the development community, it is apparent that it will become increasingly difficult and expensive to identify an appropriate corridor as a solution that meets the ultimate purpose of the proposed project. Failure to preserve a corridor as soon as feasible would risk losing the

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PURPOSE & NEED STATEMENT

CONCURRENCE VERSION

PLACER PARKWAY CORRIDOR PRESERVATION TIER I EIS/EIR  
FEBRUARY 16, 2005

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opportunity to reduce environmental impacts and costs.

2.2.2 Travel Demand and Anticipated Congestion

Population Growth

Growth in population in southwestern Placer County, northern Sacramento County and south Sutter County will influence travel demand in the project vicinity. The project vicinity includes some of the fastest growing communities in the Sacramento region – Roseville, Rocklin, Lincoln and the Sunset Industrial Area. SACOG projects that the population in southwestern Placer County will nearly double between 2000 and 2025.

The anticipated population in the region will dramatically increase travel demands in southwestern Placer County and south Sutter County over the next 20 years and beyond. The jurisdictions in southwestern Placer County have developed Capital Improvement Programs (funded by development fees) that would maintain a high level of service on their local roadway systems. However, limited improvements are programmed for the regional roadway system and travel speeds/travel times from Placer County to both Sacramento and Sutter counties are projected to deteriorate over the next 20 years, even with improvements to local roadways already identified in local general plans.

Job Growth and Goods Movement

The I-80 corridor is the major trans-Sierra roadway in northern California accommodating the movement of goods and services. Goods and services are moved to and through the project area at a growing rate using three primary modes of transportation: road, air, and rail. The combined increase of vehicles used for the movement of goods and services as well as passenger vehicles has lead to increased congestion, which in turn decreases in travel times in the project area and competition for roadway capacity.

When the travel forecast model is completed, this information will be augmented with data to support this need. For now, note:

Current (2001) truck volumes and percentages:

> SR 65 north of I-80 – 9,060 trucks out of 60,000 total volume (15.1%)

> I-80 at Placer/Sacramento County line – 8,700 trucks out of 145,000 total volume (6%)

**PURPOSE & NEED STATEMENT**

**CONCURRENCE VERSION**

**PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/EIR  
FEBRUARY 16, 2005**

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Congestion on the regional roadways connecting Placer County with Sutter and Sacramento counties will adversely impact access to jobs. The projected increase in travel times will affect the movement of goods and people, and will have an impact on the region's economy. By 2025, SACOG estimates that total employment in southwestern Placer County (172,000 employees) will exceed total employment in downtown Sacramento (154,000 employees). The high-technology industry in the SR-65 corridor, plus development of Sutter County's industrial/commercial reserve area, requires dependable access to airports to move high-value/time-critical freight. Thus, direct and convenient access and reliable travel times to both the Sacramento International Airport and the Lincoln Regional Airport are very important to this growing regional job center.

Modification of the "National Environmental Policy Act/Clean Water Act  
Section 404 Integration Process for Surface Transportation Projects  
Memorandum of Understanding (NEPA/404 MOU)"<sup>1</sup>  
for application to  
the Placer Parkway Corridor Preservation Project  
April 12, 2004

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The NEPA/404 MOU integrates requirements of the Clean Water Act Section 404 permit process into the NEPA environmental review. This integration facilitates the preparation of the Section 404 permit application at the end of the NEPA process. While a Tier 1 evaluation will not result in a Section 404 permit application, the associated Tier 2 project will require a permit. Therefore, the NEPA/404 process is modified for Tier 1 to reflect decisions made at Tier 1, and to anticipate the permit application requirements at Tier 2. The NEPA/404 process for Tier 2 will follow the standard procedure outlined in Appendix A of the NEPA/404 MOU.

The goal of the modified NEPA/404 process for Tier 1 is to ensure that Tier 1 decisions reflect careful consideration of the 404(b)(1) Guidelines (40 CFR 230), which are binding, substantive regulations implementing the Clean Water Act. The Guidelines should be addressed as early as possible in the Tier 1 NEPA evaluation to eliminate the need to revisit decisions in Tier 2 that might otherwise conflict with 404 permit requirements.

The Tier 1 (modified) and Tier 2 (standard) NEPA/404 processes are similar in many respects. Both Tier 1 and Tier 2 NEPA/404 include five concurrence points<sup>2</sup>. The main difference between Tier 1 and Tier 2 NEPA/404 processes are the last two concurrence points. In Tier 2, the project proponent seeks agency concurrence on the "least environmentally damaging practicable alternative"(LEDPA) and the conceptual mitigation plan for the LEDPA. In Tier 1, however, the project proponent seeks agency concurrence on the alternative (corridor) *most likely to contain the LEDPA*, and on the *general framework* for mitigation. All other elements of the standard NEPA/404 process apply, unless otherwise indicated.

The Tier 1 modified NEPA/404 process includes five concurrence points:

1. Purpose and Need
2. Criteria for Selecting the Range of Alternatives
3. Range of Alternatives
4. Alternative(s) most likely to contain the LEDPA
5. Mitigation Framework

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<sup>1</sup>Signed by Federal Highway Administration, Federal Transit Administration, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Transportation, Arizona Department of Transportation, Nevada Department of Transportation (1993).

<sup>2</sup>Concurrence/Non-Concurrence is described in Section VI of the NEPA/404 MOU.



These concurrence points are sequential, each one building upon and consistent with previous concurrences. Concurrence points #1 to #3 occur prior to completion of the Tier 1 Draft EIS. Concurrence points #4 and #5 occur prior to completion of the Tier 1 Final EIS. The NEPA/404 signatory agencies may agree to bundle concurrence points for purposes of review.

#### Concurrence Point #1: Purpose and Need

The Council on Environmental Quality regulations implementing NEPA call for a statement of purpose and need (40 CFR 1502.13). The Section 404(b)(1) Guidelines include a basic purpose (40 CFR 230.10(a)(3)) and an overall project purpose (40 CFR 230.10(a)(2)). For NEPA/404 integration, one statement of purpose and need should be developed to meet all requirements.

The NEPA purpose and need statement briefly specifies the underlying purpose and need of the proposed project. The NEPA document should explain the project need, and demonstrate the project's logical termini and independent utility.

The Section 404(b)(1) Guidelines basic purpose is a brief statement that assists regulators in determining whether a project is water-dependent. The overall project purpose is an elaboration of the basic purpose, and provides a more specific description of the purpose and need for the project.<sup>3</sup> The overall project purpose should be broad enough to allow for an appropriate range of alternatives that avoid special aquatic sites, as defined in the Section 404 (b)(1) Guidelines (40 CFR 230 Subpart E). "Avoidance alternatives" could include alternatives that do not require securing a new right-of-way, maximize use of existing infrastructure, implement congestion pricing, or adjust the project study area to include alignments that impact fewer aquatic resources.

#### Concurrence Point #2: Criteria for Selecting the Range of Alternatives

The project sponsor develops criteria for selecting a reasonable range of alternatives. If the number of potential alternatives generated is very large, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS.<sup>4</sup> The criteria can be used to screen out or narrow the range of alternatives that will be carried forward for analysis in the Draft EIS. For NEPA/404 MOU projects, environmental criteria should be applied so that each alternative can be ranked based on its impact to the aquatic ecosystem.

Two types of screening criteria that can be effective for Tier 1 decision making are "project purpose" and "fatal flaw" analyses. Under the Clean Water Act Section 404 (b)(1) Guidelines, an alternative may be eliminated from consideration in the Draft EIS if it does not meet the project purpose. Fatal flaws are unavoidable or unmitigatable impacts associated with an alternative that are so great that the project could never go forward.

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<sup>3</sup>For a discussion of basic purpose and overall project purpose, see Yocom, T.G., R.A. Leidy, and C.A. Morris. 1989. "Wetlands Protection Through Impact Avoidance: A Discussion of the 404(b)(1) Alternatives Analysis." *Wetlands*. Vol 9, No. 2, pages 283-297.

<sup>4</sup>Council on Environmental Quality's Questions and Answers about the NEPA Regulations, Question 1.b. (1981)

### Concurrence Point #3: Range of Alternatives

The Range of Alternatives includes those alternatives that will be evaluated in the Draft EIS. For NEPA/404 projects, the range should include alternatives that avoid and minimize impacts to waters of the U.S. to the greatest extent possible. The range can include reasonable alternatives not within the jurisdiction of the lead agency, and a no-action alternative (40 CFR 1502.14 (c) and (d)).

— Tier 1 DEIS Circulation and Public Comment Period —

### Concurrence Point #4: Alternative(s) most likely to contain the LEDPA

The U.S. Army Corps of Engineers cannot grant a CWA Section 404 permit to a Tier 2 preferred alternative that is not the LEDPA. Therefore, it is critical that any alternative likely to contain the LEDPA is not prematurely eliminated during the Tier 1 NEPA review. Although a Tier 1 landscape-level analysis may provide enough information to eliminate alternatives that would clearly have the *greatest* environmental impacts, the analysis may not be detailed enough to identify with certainty a *single* alternative that is likely to contain the LEDPA. If the Tier 1 analysis indicates that there are several alternatives likely to contain the LEDPA, and the lead agency does not want to prematurely eliminate any alternative likely to contain the LEDPA, then all of the alternatives likely to contain the LEDPA should be carried forward to Tier 2.

However, the lead agency can attempt to further narrow the range of alternatives likely to contain the LEDPA by performing additional analysis in Tier 1. Analytical tools could include:

- functional assessment of aquatic resources,
- photo-interpretation of aerial photos,
- spot surveys,
- delineations in selected areas of special significance,
- full delineation of waters of the U.S., or
- geo-referenced data points from delineations done for this or other projects.

If the lead agency chooses to eliminate in Tier 1 any alternative(s) likely to contain the LEDPA, there is a risk that the eliminated alternative(s) may need to be revisited in Tier 2.

### Concurrence Point #5 – Mitigation Framework

The Tier 1 mitigation framework will describe in general terms the processes that the project sponsor will use to maximize opportunities for successful mitigation, including long-term mitigation and management of resources. The framework should identify:

1. Mitigation options available for creation, restoration, enhancement and preservation of aquatic resources (e.g., land dedication, acquisition of conservation easements, in lieu fees for acquisition, mitigation banks), and potential mitigation sites.

2. Opportunities to build upon existing or planned conservation efforts of other agencies and non-governmental organizations for the purposes of protecting and restoring large, intact landscapes.
3. Institutions and instruments for long-term management of mitigation sites.

— *Tier 1 FEIS Circulation. Agency Comment Period. Tier 1 Record of Decision.* —

Note: It is presumed that the Tier 2 project will follow the standard NEPA/404 MOU process.



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO  
CORPS OF ENGINEERS  
1325 J STREET  
SACRAMENTO, CALIFORNIA 95814-2922

October 12, 2005

Regulatory Branch (200500470)

Leland Dong  
Senior Transportation Engineer  
Federal Highway Administration  
650 Capitol Mall Suite 1-400  
Sacramento, CA 95814

Dear Mr. Dong:

We are writing in response to your letter of February 25, 2005 requesting Corps of Engineers' concurrence on the Purpose and Need statement for the Tier I Placer Parkway Corridor Preservation project. This request is pursuant to the National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding (NEPA 404 MOU) as modified for the Tier 1 Placer Parkway Corridor Preservation Project (April 12, 2004).

The Corps of Engineers concurs with the Purpose and Need Statement - Concurrence Version (February 16, 2005). The brief project purpose (Section 2.1) reads:

"The goal of the Tier 1 phase of the proposed Placer Parkway project is to preserve a right-of-way for a proposed transportation facility that contributes to the ultimate project purpose. The ultimate purpose of the proposed Placer Parkway project is to reduce anticipated congestion on the local and regional transportation system and advance economic development goals in southwestern Placer County and south Sutter County."

Additionally, we are responding to your letter of June 6, 2005 requesting Corps of Engineers concurrence on the criteria for selecting the range of alternatives for the above-referenced project.

The Corps of Engineers concurs with the Criteria for Selecting the Range of Alternatives (May 19, 2005). The criteria read as follows:

"The following criteria will determine the reasonable range of alternatives to advance to the DEIS/EIR. The range of alternatives can include both new roadway and non-roadway transportation solutions, e.g., expanding existing roads, a nonfreeway facility, a Transportation System Management (TSM) alternative, a shorter Parkway Alternative, or a combination of the aforementioned. Alternatives that are not consistent with this list of criteria should not be advanced to the DEIS/EIR for evaluation.

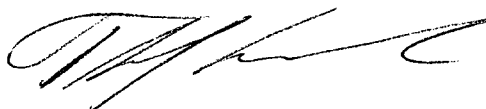
1. Meets the Project Purpose.
2. Avoids or minimizes growth inducement in environmentally sensitive areas.
3. Avoids or minimizes direct, secondary, and cumulative impacts to jurisdictional waters of the U.S., including wetlands.
4. Avoids or minimizes effects to Section 4(f) resources.
5. Is consistent with the intent of the objectives of the Placer County Conservation Plan.

Modification of the "National Environmental Policy Act/Clean Water Act Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding (NEPA 404 MOU)" for application to the Placer Parkway Corridor Preservation Project (April 12, 2004).

The next step in the NEPA 404 MOD process is for FHWA to request concurrence from EPA and the U.S. Army Corps of Engineers on the range of alternatives for this project" We appreciate the collaborative process that FHWA, Caltrans, and PCTPA have established for this project. We are committed to continuing to work with you in that spirit, and look forward to discussing the next steps in the process at our next meeting.

Please refer to identification number 200500470 in any correspondence concerning this project. If you have any questions, please contact Tom Cavanaugh at our Sacramento Valley Office, 1325 J Street, Room 1480, Sacramento, California 95814-2922, email [Thomas.J.Cavanaugh@usace.army.mil](mailto:Thomas.J.Cavanaugh@usace.army.mil), or telephone 916-557-5261. You may also use our website: [www.spk.usace.army.mil/regulatory.html](http://www.spk.usace.army.mil/regulatory.html).

Sincerely,



Thomas J. Cavanaugh  
Chief, Sacramento Valley Office

Copies Furnished:

John Webb, Caltrans North Region, 2389 Gateway Oaks Drive, Suite 100, Sacramento, California 95833

Ken Sanchez, U.S. Fish and Wildlife Service, 2800 Cottage Way, Suite W-2605, Sacramento, California 95825

Tim Vendlinski, U.S. Environmental Protection Agency, 75 Hawthorne Street, San Francisco, California 94105-3901



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

July 12, 2005

Gene K. Fong  
Division Administrator  
Federal Highway Administration  
650 Capitol Mall Suite 1-400  
Sacramento, CA 95814

Subject: Concurrence on the Criteria for Selecting the Range of Alternatives for the Tier 1 Placer Parkway Corridor Preservation Project in Placer County, California

Dear Mr. Fong:

We are writing in response to your letter of June 6, 2005 requesting EPA's concurrence on the criteria for selecting the range of alternatives for the above-referenced project. This request is pursuant to the National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU) as modified for the Tier 1 Placer Parkway Corridor Preservation Project (April 12, 2004)<sup>1</sup>.

EPA concurs with the attached *Criteria for Selecting the Range of Alternatives (May 19, 2005)*. We appreciate the responsiveness of the Federal Highway Administration (FHWA), Caltrans, and the Placer County Transportation Planning Agency (PCTPA) to EPA's concerns with the selection criteria. The criteria read as follows:

"The following criteria will determine the reasonable range of alternatives to advance to the DEIS/EIR. The range of alternatives can include both new roadway and non-roadway transportation solutions, e.g., expanding existing roads, a non-freeway facility, a Transportation System Management (TSM) alternative, a shorter Parkway Alternative, or a combination of the aforementioned. Alternatives that are not consistent with this list of criteria should not be advanced to the DEIS/EIR for evaluation.

1. Meets the Project Purpose.
2. Avoids or minimizes growth inducement in environmentally sensitive areas.
3. Avoids or minimizes direct, secondary, and cumulative impacts to jurisdictional waters of the U.S., including wetlands.
4. Avoids or minimizes effects to Section 4(f) resources.
5. Is consistent with the intent of the objectives of the Placer County Conservation Plan.

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<sup>1</sup>Modification of the "National Environmental Policy Act/Clean Water Act Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding (NEPA/404 MOU)" for application to the Placer Parkway Corridor Preservation Project (April 12, 2004).

The next step in the NEPA/404 MOU process is for FHWA to request concurrence from EPA and the U.S. Army Corps of Engineers on the range of alternatives for this project. We appreciate the collaborative process that FHWA, Caltrans, and PCTPA have established for this project. We are committed to continuing to work with you in that spirit, and look forward to discussing the next steps in the process at our next meeting.

If you have any questions, please contact Nancy Levin of my staff at 415-972-3848 or [levin.nancy@epa.gov](mailto:levin.nancy@epa.gov) or Erin Foresman of EPA's Wetlands Regulatory Office at 415-972-3396 or [foresman.erin@epa.gov](mailto:foresman.erin@epa.gov).

Sincerely,



Nova Blazej, Acting Manager  
Environmental Review Office

Enclosure

Federal Highway Administration letter, June 6, 2005

cc: John Webb, Caltrans North Region  
Tom Cavanaugh, U.S. Army Corps of Engineers  
Celia McAdam, Placer County Transportation Planning Agency  
Ken Sanchez, U.S. Fish and Wildlife Service  
Michael Aceituno, National Oceanic and Atmospheric Administration Fisheries



U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
CALIFORNIA DIVISION  
650 Capitol Mall, Suite 4-100  
Sacramento, CA. 95814  
June 6, 2005

004251

IN REPLY REFER TO  
HDA-CA  
File # 03-Pla-CR  
Placer Parkway  
Document # P52636

Nova Blazej, Federal Activities Office (CMD-2)  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Attention: Ms. Nancy Levin

Dear Ms. Nova Blazej:



The Federal Highway Administration (FHWA), the California Department of Transportation (Caltrans) and the Placer County Transportation Agency (PCPTA) are requesting your concurrence of the criteria for selecting the range of alternatives for the Placer Parkway in Placer County, as part of the NEPA/Section 404 Memorandum of Understanding with the FHWA, Caltrans, the U.S. Army Corps of Engineers, the Environmental Protection Agency and the U.S. Fish and Wildlife Service.

The criteria for selecting the range of alternatives is intended to be included in the Environmental Impact Statement/Environmental Impact Report for circulation to the public. The criteria were revised to address federal resource agency comments, as discussed at the Placer Parkway Coordination Meeting of May 18, 2005. The final Criteria For Selecting the Range of Alternatives, Concurrence Point #2, were attached to an e-mail from Stan Tidman on May 19, 2005, and are also attached to this letter.

Based on the comments and verbal agreement reached at the May 18 meeting, the FHWA requests final concurrence from your agency on the criteria for selecting the range of alternatives. The FHWA, Caltrans, and PCPTA greatly appreciate your ongoing involvement in the Placer Parkway Corridor project. Following your formal agreement on the criteria for selecting the range of alternatives, we look forward to working with you in the development of project alternatives.

Sincerely,

For  
Gene K. Fong  
Division Administrator

Enclosure





cc: w/Enclosure (by E-mail)  
Jay Norvell, CT – HQ  
Terry Abbott, CT – HQ  
Germaine Belanger, CT – HQ  
Katrina Pierce, CT – D-3  
John Webb, CT – D-3  
Japtej Gill, CT – D-3  
Steve Probst, CT – D-3  
Pat McAchren, CT – D-3  
Celia McAdam, PCTPA  
Stan Tidman, PCTPA  
Leland Dong  
Gary Sweeten

*GSweeten/kmo*

**CRITERIA FOR SELECTING THE RANGE OF ALTERNATIVES****CONCURRENCE POINT #2****PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/EIR**

MAY 19, 2005

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The following criteria will determine the reasonable range of alternatives to advance to the DEIS/EIR. The range of alternatives can include both new roadway and non-roadway transportation solutions, e.g. expanding existing roads, a non-freeway facility, a Transportation System Management (TSM) alternative, a shorter Parkway Alternative, or a combination of the aforementioned. Alternatives that are not consistent with this list of criteria should not be advanced to the DEIS/EIR for evaluation.

1. Meets the Project Purpose.
2. Avoids or minimizes growth inducement in environmentally sensitive areas.
3. Avoids or minimizes direct, secondary, and cumulative impacts to jurisdictional waters of the U.S. including wetlands.
4. Avoids or minimizes effects to Section 4(f) resources.
5. Is consistent with the intent of the objectives of the Placer County Conservation Plan.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

February 16, 2006

Gene K. Fong  
Division Administrator  
Federal Highway Administration  
650 Capitol Mall Suite 1-400  
Sacramento, CA 95814

**Subject: Concurrence on the Range of Alternatives for the Tier 1 Placer Parkway Corridor Preservation Project in Placer County, California**

Dear Mr. Fong:

We are writing in response to your letter of January 18, 2006 requesting EPA's concurrence on the range of alternatives for the above-referenced project. This request is pursuant to the National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU) as modified for the Tier 1 Placer Parkway Corridor Preservation Project (April 12, 2004).<sup>1</sup>

EPA concurs with the range of alternatives ("Five Recommended Corridor Alignment Alternatives" and the No-Build Alternative) as described in the January 18, 2006 letter. All of the five build alternatives extend east from SR 70/99 in South Sutter County and run south of Pleasant Grove Creek, crossing the Creek at east end of the future City of Roseville Retention Basin, and extending to SR 65 at Whitney Boulevard in Placer County.

We also commend the Federal Highway Administration's (FHWA) commitment, as expressed in your letter and prior interagency meetings, to incorporate into each alternative various measures to avoid and minimize direct and indirect (including growth-inducing) impacts to aquatic resources and other natural resources. These measures include: restricting access in the seven-mile segment between Fiddyment Road and Pleasant Grove Road to one potential connection at a future Watt Avenue extension or another road nearby; spanning Pleasant Grove Creek; and creating a no-development buffer zone that uses multiple tools to protect resources from induced growth. Such concepts, as outlined in your letter, include a buffer policy with land-use controls, land leases, general plans, zoning/overlay zoning, covenants/deed restrictions, conservation easements and urban growth boundaries.

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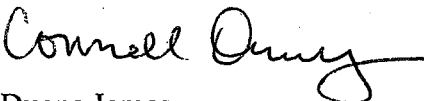
<sup>1</sup>Modification of the "National Environmental Policy Act/Clean Water Act Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding (NEPA/404 MOU)" for application to the Placer Parkway Corridor Preservation Project (April 12, 2004).

We also support FHWA's decision, as described in your letter, to include a "Land Use and Policy Scenario" in the Draft Environmental Impact Statement (EIS). This "Land Use and Policy Scenario" would analyze how future transportation demand could be met in the area by changing land use and policy assumptions. The goal of the evaluation is to disclose to decision makers and the public how land-use, transportation policy, and "smart-growth" tools could be used, in combination with increased transit and transportation system management tools, to lower vehicle miles traveled (VMT) so that future transportation needs could be met without a new freeway.

Finally, we appreciate the collaborative process that FHWA, Caltrans, and the Placer County Transportation Planning Agency (PCTPA) have established for this project, and your agency's responsiveness to EPA's concerns regarding the range of alternatives for this project.

We look forward to reviewing the Draft EIS and to continued participation through the NEPA/404 process. When the Draft EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact me at 415-972-3988 or Nancy Levin, the lead reviewer for this project. Nancy can be reached at 415-972-3848 or levin.nancy@epa.gov.

Sincerely,

  
for Duane James  
Environmental Review Office

Enclosure

Federal Highway Administration letter, January 18, 2006

cc: John Webb, Caltrans North Region  
Tom Cavanaugh, U.S. Army Corps of Engineers  
Celia McAdam, Placer County Transportation Planning Agency  
Ken Sanchez, U.S. Fish and Wildlife Service  
John C. Baker, NOAA Fisheries  
Jeffrey Finn, California Department of Fish and Game

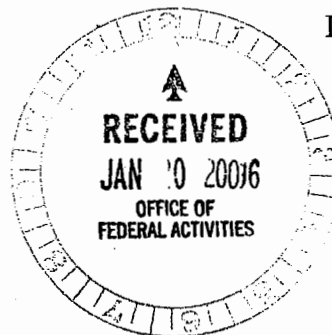


U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
CALIFORNIA DIVISION  
650 Capitol Mall, Suite 4-100  
Sacramento, CA. 95814  
January 18, 2006

004251

IN REPLY REFER TO  
HDA-CA  
File # Placer pkwy  
Document # P53794

Nova Blazej, Federal Activities Office (CMD-2)  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105-3901



Attention: Ms. Nancy Levin

Dear Ms. Blazej:

The Federal Highway Administration (FHWA), the California Department of Transportation (Caltrans) and the Placer County Transportation Agency (PCTPA) are requesting your concurrence on the range of alternatives for the Placer Parkway in Placer County, as part of the NEPA/Section 404 Memorandum of Understanding with the FHWA, Caltrans, the U.S. Army Corps of Engineers, the Environmental Protection Agency and the U.S. Fish and Wildlife Service.

The range of alternatives is intended to be included in the Environmental Impact Statement/Environmental Impact Report for circulation to the public.

These discussions were initiated at the June 28, 2005 meeting, after concurrence was reached on (1) Purpose and Need and (2) Criteria to be Used for Selecting the Range of Alternatives.

The range of alternatives to be studied in the Draft EIS/EIR includes the five build alternatives approved by the South Placer Regional Transportation Authority (SPRTA) Board plus the No Build Alternative. The build alternatives are shown on the attached Figure, entitled Five Recommended Corridor Alignment Alternatives, dated October 24, 2005.

- (a) Alternative 1 – the “Red Alternative”: Extending from SR 70/99 approximately 1/2 mile north of Riego Road, east approximately one mile north of Baseline Road to approximately Watt Avenue, proceeding north and transitioning in an easterly direction at the future City of Roseville Retention Basin, then in an easterly direction connecting to SR 65 at Whitney Boulevard.
- (b) Alternative 2 – the “Orange Alternative”: Extending from SR 70/99 approximately 1/2 mile north of Riego Road to an area between Pleasant Grove Road and Locust Road, where it would proceed northeast to the future City of Roseville Retention Basin, then in an easterly direction connecting to SR 65 at Whitney Boulevard.



- (c) Alternative 3 – the “Blue Alternative”: Extending from SR 70/99 approximately 1/2 mile north of Riego Road to an area between Pleasant Grove Road and Locust Road, where it would proceed north along the Sutter/Placer County Line, transitioning to an easterly direction approximately one-half mile south of the future City of Roseville Retention Basin, north past the basin and then east, connecting to SR 65 at Whitney Boulevard.
- (d) Alternative 4 – the “Yellow Alternative”: Extending from SR 70/99 at the current Sankey Road/SR 70/99 intersection, proceeding east and northeast, transitioning to an easterly direction approximately one-half mile south of the future City of Roseville Retention Basin, north past the basin and then east, connecting to SR 65 at Whitney Boulevard.
- (e) Alternative 5 – the “Green Alternative”: Extending from SR 70/99 at the current Sankey Road/SR 70/99 intersection, proceeding east and northeast, transitioning to an easterly direction just south of the future City of Roseville Retention Basin, north past the basin and then east, connecting to SR 65 at Whitney Boulevard.

In addition, all build alternatives will include the following concepts to avoid and minimize direct and indirect impacts to aquatic resources and other natural resources:

1. Implement the following goals and policies identified for the project:
  - Do not allow access in areas currently designated for agricultural uses;
  - Restrict access in the seven-mile segment between Fiddymont Road and Pleasant Grove Road to one potential connection to a future extension of Watt Avenue or another nearby roadway extension;
  - Create a no-development buffer zone along the Parkway, ranging from 500 feet in the western and eastern segment to 1000 feet in the central segment; and,
  - Buy agricultural/conservation easements in areas along the Parkway to prevent development within the buffer zone.
2. Project proponents will be working toward implementing the buffer policy, including such potential concepts as land use controls, land leases, general plans, zoning/overlay zoning, covenants/deed restrictions, conservation easements, urban growth boundaries.
3. Span Pleasant Grove Creek.
4. Use Best Management Policies (BMP) to avoid and minimize environmental impacts.

Finally, the Draft EIS/EIR will include a “Land Use and Policy Scenario” that analyzes how the future transportation demand could be met without building a new freeway, but rather by changing land use and policy assumptions. The goal of the evaluation is to disclose to decision makers and the public how land use, policy, and “smart-growth” tools could be used, in

combination with increased transit and transportation system management tools, to lower VMT enough so that a new freeway would not be necessary. This analysis will not be an alternative for purposes of NEPA and CEQA analysis.

The analysis will describe and incorporate all feasible tools to meet anticipated demand without a new freeway, even those that are outside the authority of the project sponsors or would require actions by municipalities or decision makers outside the Placer Parkway study area. Some of these tools are used in the Sacramento Region Blueprint Transportation and Land Use Study (2005), and the "Modeling Long-Range Transportation and Land Use Scenarios for the Sacramento Region, Using Citizen Generate Policies" Report to the Mineta Foundation (Johnston, Gao, and Clay 2004). They include pricing mechanisms such as parking fees and congestion pricing; mode shifts from auto to transit/biking/walking, establishing strong urban growth boundaries, and increasing land use densities.

The FHWA, Caltrans, and PCTPA greatly appreciate your ongoing involvement in the Placer Parkway Corridor project. Following your formal agreement on the range of alternatives for this project, we will prepare the Draft EIS/EIR for circulation and public review.

Sincerely,



For  
Gene K. Fong  
Division Administrator

Enclosure

cc: (E-mail) (w/Enclosure)  
Jay Norvell, Caltrans  
Terry Abbott, Caltrans  
Germaine Belanger, Caltrans  
Katrina Pierce, Caltrans  
John Webb, Caltrans  
Japtej Gill, Caltrans  
Steve Propst, Caltrans  
Pat McAchren, Caltrans  
Celia McAdam, PCTPA  
Stan Tidman, PCTPA  
Leland Dong, FHWA  
Gary Sweeten, FHWA  
Maiser Khaled, FHWA



**DRAFT CONCURRENCE POINTS FOR RANGE OF ALTERNATIVES  
PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/EIR**

**Dated December 15, 2005**

An interagency working group has been meeting to develop concurrence regarding the range of alternatives to be studied in the Tier 1 Draft EIS/EIR for the Placer Parkway Corridor Preservation Project. These discussions were initiated at the June 28, 2005 meeting, after concurrence was reached on (1) Purpose and Need and (2) Criteria to be Used for Selecting the Range of Alternatives.

Evaluation of a wide range of alternatives was a key component of the group's discussion's, because the Placer Parkway Tier 1 EIS/EIR is intended to identify a corridor where a Placer Parkway will be constructed. Prior to construction, future project-specific NEPA approval and a Clean Water Act Section 404 permit will be required. Because a Section 404 permit can only be granted for the LEDPA, the working group considered a wide range of potential alternatives to ensure that any likely LEDPAs were not eliminated at this stage. This work was undertaken to streamline the environmental review process when a Section 404 permit application is filed in the future.

The group looked at a wide range of alternatives to meet the project need, and arrived at this range of alternatives in several ways. This range included: 1) PCTPA build alternatives, 2) TSM Alternative; 3) Shorter Parkway Alternative; 4) Combined TSM/Shorter Parkway Alternative.

The PCTPA build alternatives were developed based on avoidance principles and were designed to avoid or minimize impacts to aquatic resources, consistent with the Purpose and Need and engineering constraints. For instance, potential interchanges with State Highways are dictated in part by existing interchanges and distance requirements for safety.

The group also identified potential alternatives that did not require building a new roadway, or that would reduce the length of a new roadway. These concepts included a TSM Alternative that went beyond traditional TSM measures to include widening of existing roadways, additional and more robust transit routes, and other measures that would improve traffic flow. Another concept considered was to construct a new roadway in the eastern portion of the study area that would connect to Baseline Road one-half to one mile west of Watt Avenue, and continue west as Baseline Road without the need for a new roadway from Watt Avenue to State Route 70/99. In this scenario, Baseline Road would be upgraded to a 6-lane expressway, with no driveway access and some grade-separated interchanges. Neither of these concepts met the project's Purpose and Need, resulting in LOS F levels of congestion for up to 3 hours per day. These two concepts were then combined, with robust additional transit added to the original TSM concept, combined with the shorter Parkway terminating at a Baseline Road west of Watt Avenue. This concept also resulted in LOS F levels of congestion for up to 3 hours per day.

An additional concept was then identified. The team considered what would be required to satisfy the transportation need in this corridor. In this concept, Baseline Road would be a six- to eight-lane full freeway, with two- to four-lane parallel frontage roads on both sides of the freeway to provide local access currently being provided by Baseline Road. It would include additional interchanges and additional lanes on the Riego/SR 70/99 freeway interchange ramps. It would effectively result in a new facility, since an expanded roadway and frontage roads would be required. This concept would produce

somewhat better results, but still would result in LOS F conditions along portions of Baseline/Riego Road. It would not meet the project's Purpose and Need.

To be sure the group didn't leave anything out, it looked at other ways of meeting the project need, such as changes in land use policies, densities, etc. Recognizing that this group doesn't have land use control, it was determined that such an evaluation would not result in a feasible alternative. However, the evaluation will be conducted and included in the Draft EIS/EIR to provide valuable information to policy makers regarding future land use decisions that may be made. The group was not able to identify feasible alternatives that did not involve a new roadway.

The group agreed to include the five build alternatives identified by PCTPA plus the No Build Alternative, with a commitment to construction options and resource protection as a way to meet avoidance obligations. The concurrence points are summarized below:

- 2) The range of alternatives to be studied in the Draft EIS/EIR includes the five build alternatives approved by the SPRTA Board plus the No Build Alternative. The build alternatives are shown on the attached Figure, entitled Five Recommended Corridor Alignment Alternatives, dated October 24, 2005.
  - (a) Alternative 1 – the “Red Alternative”: Extending from SR 70/99 approximately 1/2 mile north of Riego Road, east approximately one mile north of Baseline Road to approximately Watt Avenue, proceeding north and transitioning in an easterly direction at the future City of Roseville Retention Basin, then in an easterly direction connecting to SR 65 at Whitney Boulevard.
  - (b) Alternative 2 – the “Orange Alternative”: Extending from SR 70/99 approximately 1/2 mile north of Riego Road to an area between Pleasant Grove Road and Locust Road, where it would proceed northeast to the future City of Roseville Retention Basin, then in an easterly direction connecting to SR 65 at Whitney Boulevard.
  - (c) Alternative 3 – the “Blue Alternative”: Extending from SR 70/99 approximately 1/2 mile north of Riego Road to an area between Pleasant Grove Road and Locust Road, where it would proceed north along the Sutter/Placer County Line, transitioning to an easterly direction approximately one-half mile south of the future City of Roseville Retention Basin, north past the basin and then east, connecting to SR 65 at Whitney Boulevard.
  - (d) Alternative 4 – the “Yellow Alternative”: Extending from SR 70/99 at the current Sankey Road/SR 70/99 intersection, proceeding east and northeast, transitioning to an easterly direction approximately one-half mile south of the future City of Roseville Retention Basin, north past the basin and then east, connecting to SR 65 at Whitney Boulevard.
  - (e) Alternative 5 – the “Green Alternative”: Extending from SR 70/99 at the current Sankey Road/SR 70/99 intersection, proceeding east and northeast, transitioning to an easterly direction just south of the future City of Roseville Retention Basin, north past the basin and then east, connecting to SR 65 at Whitney Boulevard.

3) All build alternatives will include the following concepts to avoid and minimize direct and indirect impacts to aquatic resources and other natural resources:

(a) Implement the following goals and policies identified for the project:

- Do not allow access in areas currently designated for agricultural uses;
- Restrict access in the seven-mile segment between Fiddymment Road and Pleasant Grove Road to one potential connection to a future extension of Watt Avenue or another nearby roadway extension;
- Create a no-development buffer zone along the Parkway, ranging from 500 feet in the western and eastern segment to 1000 feet in the central segment; and,
- Buy agricultural/conservation easements in areas along the Parkway to prevent development within the buffer zone.

(b) Project proponents will be working toward implementing the buffer policy, including such potential concepts as land use controls, land leases, general plans, zoning/overlay zoning, covenants/deed restrictions, conservation easements, urban growth boundaries.

(c) Span Pleasant Grove Creek.

(d) BMPs

3) Land-use and Policy Transportation Solution: The Draft EIS/EIS will include an analysis of how the future transportation demand could be met without building a new freeway, but rather by changing land use and policy assumptions. The goal of the evaluation is to disclose to decision makers and the public how land use, policy, and “smart-growth” tools could be used, in combination with increased transit and transportation system management tools, to lower VMT enough so that a new freeway would not be necessary. This analysis will not be an alternative for purposes of NEPA and CEQA analysis.

The analysis will describe and incorporate all feasible tools to meet anticipated demand without a new freeway, even those that are outside the authority of the project sponsors or would require actions by municipalities or decision makers outside the Placer Parkway study area. Some of these tools are used in the Sacramento Region Blueprint Transportation and Land Use Study (2005), and the “Modeling Long-Range Transportation and Land Use Scenarios for the Sacramento Region, Using Citizen Generate Policies” Report to the Mineta Foundation (Johnston, Gao, and Clay 2004). They include pricing mechanisms such as parking fees and congestion pricing; mode shifts from auto to transit/biking/walking, establishing strong urban growth boundaries, and increasing land use densities.

Addresses to send to:

1) Nova Blazej, Federal Activities Office (CMD-2)  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Attention: Ms. Nancy Levin

2)  
Mr. Wayne White, Field Supervisor  
U.S. Fish and Wildlife Service  
Sacramento Fish and Wildlife Office  
2800 Cottage Way, Room W-2605  
Sacramento, CA 95825-1846

Attention: Mr. Kenneth Sanchez

3)  
Ms. Jody Jones, District Director  
California Department of Transportation  
District 3  
P.O. Box 911  
Marysville, CA 95901

Attention: Ms. Katrina Pierce

4)  
Mr. Mike Jewell, Chief  
U.S. Army Corp of Engineers  
Sacramento District Regulatory Section  
1325 J. Street  
Sacramento, CA 95814

Attention: Mr. Tom Cavanaugh

5)  
Ms. Celia McAdam, Executive Director  
Placer County Transportation Planning Committee  
249 Nevada Street  
Auburn, CA 95603



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO  
CORPS OF ENGINEERS  
1325 J STREET  
SACRAMENTO, CALIFORNIA 95814-2922

September 6, 2006

Regulatory Branch (200500470)

Gene K. Fong  
Division Administrator  
Federal Highway Administration  
650 Capitol Mall Suite 1-400  
Sacramento, California 95814

Dear Mr. Fong:

We are writing in response to your letter of January 18, 2006 requesting concurrence on the range of alternatives for the above-referenced project. This request is pursuant to the National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU) as modified for the Tier 1 Placer Parkway Corridor Preservation Project (April 12, 2004).

We concur with the range of alternatives (Five Recommended Corridor Alignment Alternatives and the No-Build Alternative) as described in the January 18, 2006 letter. All of the five build alternatives extend east from SR 70/99 in South Sutter County and run south of Pleasant Grove Creek, crossing the Creek at east end of the future City of Roseville Retention Basin, and extending to SR 65 at Whitney Boulevard in Placer County.

Please refer to identification number 200500470 in any correspondence concerning this project. If you have any questions, please contact Tom Cavanaugh at our Sacramento Valley Office, 1325 J Street, Room 1480, Sacramento, California 95814-2922, email [Thomas.J.Cavanaugh@usace.army.mil](mailto:Thomas.J.Cavanaugh@usace.army.mil), or telephone 916-557-5261. You may also use our website: [www.spk.usace.army.mil/regulatory.html](http://www.spk.usace.army.mil/regulatory.html).

Sincerely,

**ORIGINAL SIGNED**

Thomas J. Cavanaugh  
Chief, Sacramento Valley Office

Copies Furnished:

- ✓ John Webb, Caltrans North Region, 2389 Gateway Oaks Drive, Suite 100, Sacramento, California 95833
- Ken Sanchez, U.S. Fish and Wildlife Service, 2800 Cottage Way, Suite W-2605, Sacramento, California 95825
- Tim Vendlinski, U.S. Environmental Protection Agency, 75 Hawthorne Street, San Francisco, California 94105-3901



**DEPARTMENT OF THE ARMY**  
**U.S. ARMY ENGINEER DISTRICT, SACRAMENTO**  
**CORPS OF ENGINEERS**  
**1325 J STREET**  
**SACRAMENTO CA 95814-2922**

REPLY TO  
ATTENTION OF

October 29, 2009

Regulatory Division SPK-2005-00470

Walter C. Waidelich, Jr.  
Division Administrator  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
Sacramento, CA 95814

Dear Mr. Waidelich:

I am writing in response to your September 3, 2009, request for concurrence that the Placer Parkway Corridor Alternative 5 (Alternative 5) is most likely to contain the Least Environmentally Damaging Practicable Alternative (LEDPA). Additionally, you requested concurrence with the Mitigation Framework included in FHWA's September 3, 2009 correspondence.

Based on interagency discussions and the attached *Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway (August 5, 2009)*, and map, we concur that Alternative 5 with a no-access buffer is the alternative most likely to contain the LEDPA. The intent of the no-access buffer is to preclude access to the proposed parkway, either by interchanges or other means, in the central segment of the parkway. We believe limiting access to the parkway will significantly reduce the potential for growth-inducement and resulting impacts on aquatic resources. Should this project continue to Tier 2 project-level analysis, the no-access buffer concept must be included as a component of the project description for any future alignment in the Alternative 5 Corridor. This is integral to our agency's determination that the corridor is "most likely to contain the LEDPA."

We concur with the Mitigation Framework presented by FHWA in its September 3, 2009, correspondence. This framework will guide the conceptual mitigation plan prepared during the Tier 2 environmental review process and the final mitigation plan for the future project.

Please refer to identification number 200500470 in any correspondence concerning this project. If you have any questions, please contact Nancy Haley at our Sacramento Office, 1325 J Street, Room 1480, Sacramento, California 95814-2922, email [nancy.a.haley@usace.army.mil](mailto:nancy.a.haley@usace.army.mil) or telephone 916-557-7731. You may also use our website: [www.spk.usace.army.mil/regulatory.html](http://www.spk.usace.army.mil/regulatory.html).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael S. Jewell".

Michael S. Jewell  
Chief, Regulatory Division

Copies Furnished:

U.S. Fish and Wildlife Services, 2800 Cottage Way, Suite W-2605, Sacramento, California 95825-3901  
Dave Smith, US EPA, Region IX, Wetland Regulatory Office (WTR-8), 75 Hawthorne Street  
San Francisco, California 94105-3901



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

October 2, 2009

Walter C. Waidelich, Jr.  
Division Administrator  
Federal Highway Administration  
650 Capitol Mall, Suite 4-100  
Sacramento, CA 95814

**Subject:** Placer Parkway Corridor Preservation Project NEPA/404 Tier 1 Process  
Response to Request for Concurrence on the Corridor Most Likely to Contain  
the LEDPA and Mitigation Framework

Dear Mr. Waidelich:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Highway Administration (FHWA) request for concurrence that Placer Parkway Corridor Alternative 5 (Alternative 5) is most likely to contain the Least Environmentally Damaging Practicable Alternative (LEDPA), and on the Mitigation Framework included in FHWA's September 3, 2009 correspondence.

Interagency coordination regarding the Placer Parkway Corridor Preservation Project is being conducted in accordance with the National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding (NEPA/404 MOU), as modified for Tier 1 projects, outlined in a letter from EPA to FHWA dated April 1, 2004 and formalized on April 12, 2004. Participating agencies in the NEPA/404 MOU process during the development of the Tier 1 Programmatic Draft Environmental Impact Statement (DEIS) include EPA, U.S. Army Corps of Engineers (Corps), U.S. Fish and Wildlife Service (USFWS), FHWA, the California Department of Transportation (Caltrans), and South Placer County Regional Transportation Authority (SPRTA). The goal of the modified NEPA/404 MOU process is to ensure that Tier 1 decisions reflect careful consideration of the Clean Water Act (CWA) Section 404 (b)(1) Guidelines, to eliminate the need to revisit decisions at the Tier 2 project-level analysis that might conflict with CWA Section 404 permit requirements. Resolution of conflicts during the Tier 1 process will streamline the Tier 2 environmental review and permitting process.



While the agencies successfully completed the first three concurrence points in the modified Tier 1 NEPA/404 MOU, (Purpose and Need, Selection Criteria, and Range of Alternatives to be evaluated in the DEIS), EPA and the Corps did not concur with FHWA's June 24, 2008 request for concurrence that Alternative 5 is most likely to contain the LEDPA. At that time, informal dispute resolution was initiated as outlined in Appendix B of the 1994 NEPA/404 MOU. The dispute resolution process was initiated based on disagreement surrounding impacts to aquatic resources. Specifically, we were concerned that indirect impacts associated with Alternative 5 would result in greater impacts to aquatic resources (from habitat fragmentation and currently unplanned growth) than other alternatives considered in the Tier 1 environmental review process. We note that although USFWS was not a signatory to the modified NEPA/404 MOU, EPA and the Corps coordinated regularly with USFWS to ensure that all regulatory agency concerns were identified and addressed through this forum.

FHWA, Caltrans, SPRTA, EPA, the Corps, and USFWS subsequently participated in both informal and formal dispute resolution processes, which resulted in the development of a "no-access" buffer concept for the proposed corridor. This concept was discussed in the DEIS for the project, was further outlined during the dispute resolution process, and is formalized in the attached "Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway (August 5, 2009)" and map, "Alternative 5 – Corridor Most Likely to Contain the LEDPA (August 2009)." (See also attached summaries of agency correspondence on the "no-access" buffer concept and the minutes of the final dispute resolution meeting on August 5, 2009.)

Based on our interagency discussions and the attached documentation, EPA concurs with FHWA's assertion that Alternative 5 with a no-access buffer (in accordance with the attached terms) is the alternative most likely to contain the LEDPA. The intent of the no-access buffer (as indicated in the attached correspondence and map) is to preclude access to the proposed parkway, either by interchanges or other means, in the central segment of the parkway. We believe that limiting access in this manner will limit the project's induced growth impacts on aquatic resources. Should this project continue to Tier 2, project-level analysis, the no-access buffer concept must be included as a component of the project description for any future alignment in the Alternative 5 Corridor, as this concept is integral to our agencies determination of this corridor as being "most likely to contain the LEDPA."

EPA also concurs with the Mitigation Framework presented by FHWA in its September 3, 2009 correspondence. This framework will guide the conceptual mitigation plan prepared during the Tier 2 environmental review process and the final mitigation plan for the future project. EPA will be available to work with the NEPA/404 agencies to discuss future mitigation opportunities.


The next step in the modified NEPA/404 MOU process is review of the Tier 1 Final Environmental Impact Statement (FEIS). Once the Tier 1 environmental review process is complete, FHWA, Caltrans, and SPRTA may initiate the Tier 2, project-level

environmental review process. EPA will use the information collected during the Tier 1 process, specifically at the concurrence points, to guide Tier 2 project review.

EPA will provide comments on the Tier 1 FEIS pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our review of the FEIS will consider issues we raised in our comments on both the DEIS, and the Partially Revised DEIS, which we reviewed in March 2009.

Thank you for the opportunity to provide these comments. If you have any questions, please contact Connell Dunning (415-947-4161 or [dunning.connell@epa.gov](mailto:dunning.connell@epa.gov)) or Carolyn Mulvihill (415-947-3554 or [mulvihill.carolyn@epa.gov](mailto:mulvihill.carolyn@epa.gov)) of my staff, or Jason Brush of EPA's Wetlands Regulatory Office (415-972-3483 or [brush.jason@epa.gov](mailto:brush.jason@epa.gov)).

Sincerely,

*For*  


Kathleen M. Goforth, Manager  
Environmental Review Office (CED-2)

cc: Celia McAdam, South Placer Regional Transportation Authority  
Katrina Pierce, California Department of Transportation  
Nancy Haley, U.S. Army Corps of Engineers  
Ken Sanchez, U.S. Fish and Wildlife Service  
John Baker, National Marine Fisheries Service  
Jeff Finn, California Department of Fish and Game  
Loren Clark, Placer County Planning Department  
Mike McKeever, Sacramento Area Council of Governments

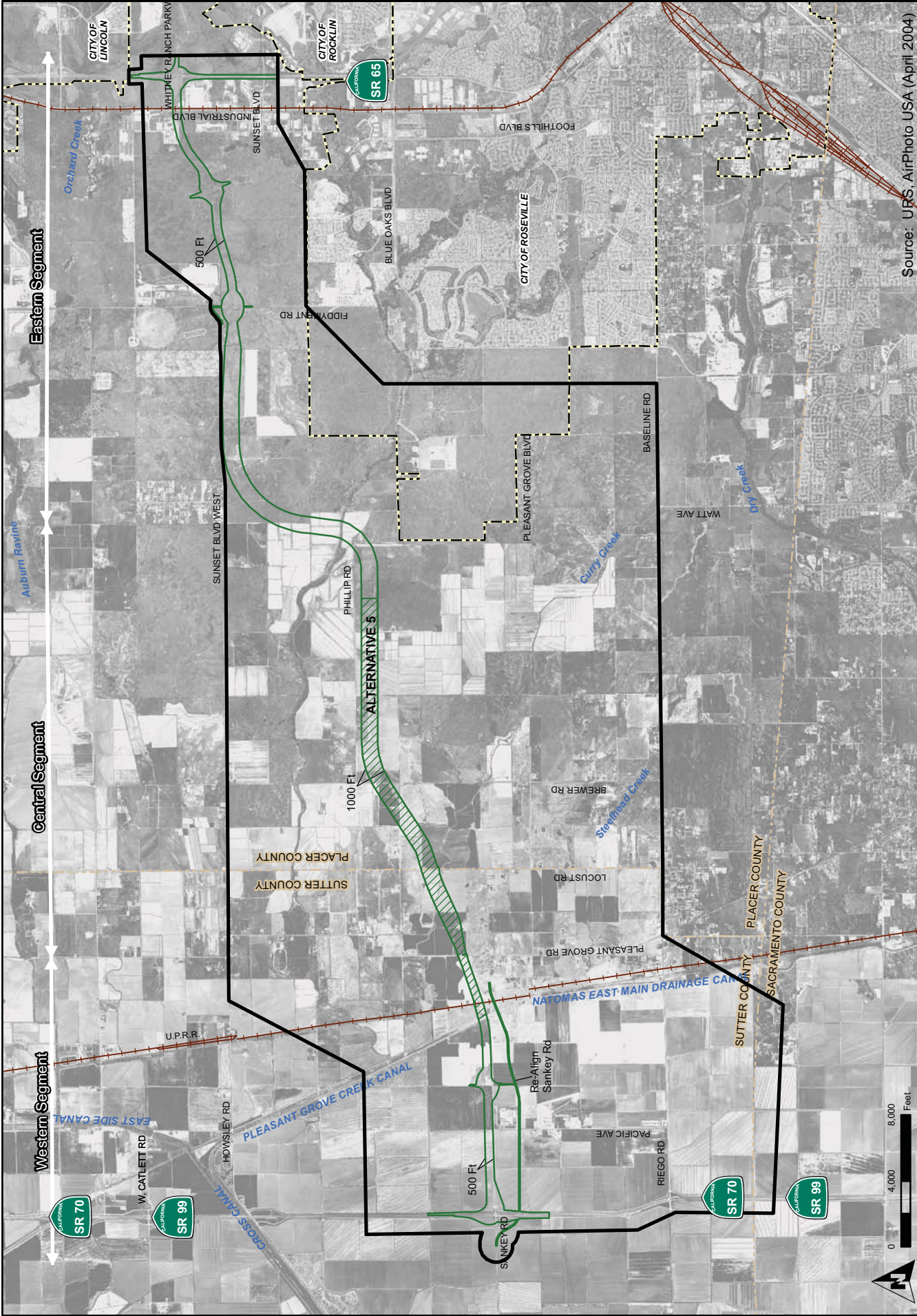
#### Attachments

1. Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway (August 5, 2009)
2. Map - Alternative 5 – Corridor Most Likely to Contain the LEDPA (August 2009)
3. Response to Erin Foresman Feedback (July 7, 2009)
4. Transportation Agencies CE Responses to July 2009 Resources Agencies' Feedback (July 31, 2009)
5. Placer Parkway Corridor Preservation Tier 1 EIS/EIR Final Meeting Notes (August 5, 2009)

Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway  
(August 5, 2009)

The following briefly outlines the attributes of an easement that could be used as a vehicle to preclude interchanges along proposed alternative 5 for the proposed Placer Parkway from 3,250 feet west of the western boundary of the Reason Farms Retention Basin panhandle to the Natomas East Main Drainage Canal, as shown on the attached figure.

- The easement will be in the form of a conservation easement created pursuant to California Civil Code Section 815.
- The easement will be perpetual in duration. The no-access provision will be binding on successive owners for the purpose of retaining the land predominantly in its natural, scenic, historical, agricultural, forested or open-space condition. (Cal. Civ. Code §§815.1, 815.2.)
- Instrument creating the conservation easement will be recorded in the county where the land is located. (Cal. Civ. Code §815.5.)
- The easement will be held by a tax-exempt nonprofit organization qualified under Section 501(c)(3) of the Internal Revenue Code and qualified to do business in California which has as its primary purpose the preservation, protection, or enhancement of land in its natural, scenic, historical, agricultural, forested, or open-space condition or use.
- If the easement will not be accepted by such non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be to convey it to a federal agency or to a state government entity such as the California Department of Fish and Game. Failing that, the NEPA/404 agencies will work together through the NEPA/404 process to identify and to concur on an acceptable conservation easement holder.
- The terms of the easement may be enforced in court, and violation of the easement may result in damages, including the cost of restoration.
- Under Subdivision Map Act, city or county must generally deny approval of a tentative map if the land is subject to an open-space easement, agricultural conservation easement, or conservation easement.
- Easement will include Grantor's covenant not to allow access to right of way from adjacent land, and not to participate in planning or construction of interchange(s) between highway project and any surface streets from 3,250 feet west of the western boundary of the Reason Farms Retention Basin panhandle to the Natomas East Main Drainage Canal. Easement to expressly provide that covenant is specifically enforceable. May also identify certain third party beneficiaries with right to enforce covenant.
- The covenant not to allow access will include a specific prohibition regarding interchange structures in the airspace over the property.



Source: URS, AirPhoto USA (April 2004)

### Alternative 5 - Corridor Most Likely to Contain the LEDPA

Tier 1 EIS/EIR

August 2009

- Study Area Boundary
- Multiple Easements
- City Boundary
- County Boundary

\* Note: Watt Ave interchange is not part of project and may be constructed in the future by others.

RESPONSE TO ERIN FORESMAN FEEDBACK  
(responses in *italics*)  
7/07/09

Re: Placer Parkway Corridor Preservation - Easement Bullet Points Pursuant to  
Concurrence Point 4  
Foresman Email 6/26/09

Erin,

Following are the transportation agencies' responses (in *italics*) to the questions you posed in your June 26, 2009 e-mail message.

1.

b. and c. Will the area identified in green stripes, on Alternative 5 in the file "Draft Placer Parkway Conservation Easement.PDF" be identified as the "no access zone"?

d. Somehow, the area identified for no access needs to be incorporated into the project description for Alternative 5.

e. How will it be maintained in Tier 2 so that all alternatives considered in Tier 2 include the no access area.

*b. and c. This area will be the "no-development buffer zone" for which easement protection commitments have been identified.*

*d. At this time, the Final EIR and the Final EIS may be circulated separately. Both documents (or a combined Final EIS/EIR – depending upon completion of the modified NEPA/404 process) will describe the Tier 1 NEPA/404 consultation and identify the easement framework and the map. We also intend to include this language in a Chapter of the EIS called Preferred Alternative. If SPRTA adopts Alternative 5, the description will be included in the resolution of adoption, and if FHWA selects Alternative 5, this language will be included in the Record of Decision.*

*e. The easement provision will be included in the description of the Preferred Alternative which, if adopted by FHWA and SPRTA, will be the subject of Tier 2. The Preferred Alternative corridor will be the area within which alternative specific roadway alignments will be considered, so the easement provision will be part of all initial Tier 2 build alternatives. Although the Tier 2 process may consider any feasible alternatives, it is the intent of the agencies' participating in the NEPA/404 process that the conservation framework and map would be maintained in Tier 2 and that with the*

*framework included Tier 2 need not look outside the Alternative 5 corridor for the LEDPA.*

*For clarity, please note that more detailed study in Tier 2 may identify some adjustments in the boundaries of the corridor, as described on Page 2-9 of the Draft Tier 1 EIS/EIR. It is intended that the easement framework would apply to the corridor within which the alternatives analyzed in Tier 2 occur, with the eastern and western extents fixed as identified in the map referenced above, and with a no-development buffer width for the preferred alignment of approximately 1,000 feet in such area.*

2.

Terms of the no access easement – I recommend replacing language highlighted in yellow below with language from the multi-agency approved conservation easement template quoted in “b” below. This language is already agreed upon by multiple natural resource regulatory agencies.

- a. If the easement will not be accepted by such a non-profit organization, or if the organization is no longer able to hold the easement, it may be held by the state or any city, county, city and county, district, or other state or local governmental entity, if otherwise authorized to acquire and hold title to real property.
- b. “Grantee is authorized to hold this conservation easement pursuant to California Civil Code Section 815.3 and Government Code Section 65965. Specifically, Grantee is (i) a tax-exempt nonprofit organization qualified under 501(c)(3) of the Internal Revenue Code of 1986, as amended, and qualified to do business in California; (ii) a “qualified organization” as defined in section 170(h)(3) of the Internal Revenue Code; and (iii) an organization which has as its primary and principal purpose and activity the protection and preservation of natural lands or resources in its natural, scenic, agricultural, forested, or open space condition or use.”
- c. This language is consistent with anticipating no change in land use from what is currently happening today around the Alternative 5 Placer Parkway corridor as it provides for maintaining natural lands in **agricultural and open space** condition or use.

*a. The language highlighted has a different purpose than the proposed language offered in b – its intent is to describe what entities might hold the easement if a non-profit is unable to hold it. It should not be deleted. We understand and agree with your concerns that a local jurisdiction would not be the easement-holder of choice. We suggest that the language be modified to read: “If the easement will not be accepted by such a non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be made to convey it to a federal agency or to a state governmental entity such as California Department of Fish and Game. Failing that, it may be held by any city, county, city and*

*county, district, or other local governmental entity, if otherwise authorized to acquire and hold title to real property.”*

*b. As discussed below, we did not expect to provide specific easement language as part of a framework. However, we have no objection in principle to using this proposed language as the definition of the kind of non-profit organization intended to hold the easement,*

*c. We agree that the intention of the easement is to prohibit access by maintaining the area for the purposes set forth in the easement.*

3.

It was my understanding that the transportation agencies would provide the specific language regarding prohibition of interchange structures in the airspace over the property. This language wasn't provided, only a statement that it would be provided. Please provide the language that is likely to be used in the easement document regarding prohibition of interchange structures in the airspace over the property. I think agreement on this language is necessary before we can provide concurrence.

*We did not expect to provide specific language as part of a framework. The specific language should be worked out during the Tier 2 process, at which time more detailed information would be available, as it is not practicable to consider every eventuality during Tier 1. The following language, or substantially similar language, is intended:*

*“Grantee has the right to prevent any activity on or use of the Property that is inconsistent with the Purpose of this Conservation Easement, including but not limited to the construction of any structures under, over, around or through the Property intended to provide access to the adjacent highway known as Placer Parkway, including but not limited to interchanges.”*

4.

We need to understand how the conservation easement will be adjusted to prevent access on both sides of the parkway facility in order to concur at this point. The general statement, “It is agreed that the easement would be adjusted to protect both sides of the roadway in the event that the roadway were to be located at the very edge of the corridor, to preserve access control,” is too general. Understanding approximately how much additional area outside of the corridor area will be placed under easement to prevent parkway access is necessary for completing the concurrence point.

*The easement will be entirely within the buffer zone, and will be approximately 1000 feet wide. The width of the buffer zone will not change, but if necessary, the Parkway corridor will be adjusted to assure that the buffer extends approximately 25 feet on both sides of the roadway.*

## Background

The transportation agencies believe that we are close to finalizing agreement on the Conservation Framework; which will lead to concurrence that Alternative #5 is the corridor most likely to contain the LEDPA. This is the transportation agencies latest response to July 2009 feedback received from the resources agencies on terms of the conservation easement (CE) proposed for the Conservation Framework. We offer this feedback as a basis for discussion at our August 5, 2009 meeting, and completion of the LEDPA concurrence point.

Relevant background documents include the following:

- April 17, 2009 Conservation Framework Meeting #1 -- Placer Parkway Alternative 5 LEDPA Options that avoid growth inducing impacts to ESA and CWA resources, provided by resources agencies.
- May 11, 2009 email from Stan Tidman -- Conservation Framework Meeting Follow-up.
- May 29, 2009 Conservation Framework Meeting #2 – Final Meeting Notes.
- June 12, 2009 email from Denise Heick (on behalf of the transportation agencies) -- Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway for resources agencies' review (bullet list and pdf of map).
- June 26, 2009 email from Erin Foresman, USEPA -- responding to Terms of No-Access Easement
- July 7, 2009 memo from Stan Tidman -- Transportation agencies' Response to Erin Foresman feedback (emailed July 8, 2009).
- July 14, 2009 email from Nancy Haley, USACE – feedback
- July 15, 2009 email from Michelle Tovar, USFWS – feedback
- July 21, 2009 email from Carolyn Mulvihill, USEPA -- feedback



**1. Future documentation for LEDPA concurrence request and FEIS's Preferred Alternative.**

- Corps (Nancy Haley – 7.14.2009 email)  
No issue identified.
- USFWS – (Michelle Tovar -- 7.15.2009)  
No issue identified.
- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
**EPA requests that in future documentation, such as the request for concurrence on the corridor most likely to contain the LEDPA and the FEIS, the preferred alternative be described as “Modified Alternative 5” or another description which clarifies that the alternative is different from the Alternative 5 discussed in previous documents.**

Transportation agencies' response:

*Please note that the Draft Tier 1 EIS/EIR's No-Development Buffer Concept (Section 2.2.4) describes the no-development buffer zone and its intent to accomplish: 1) furthering a “parkway” concept and 2) limiting access to the Parkway. the Draft EIS/EIR then outlines a number of general mechanisms to limit new interchanges by controlling buffer development. We believe that the conservation framework is entirely consistent with the description of the project in the Draft EIS/EIR, and helps to refine the general outline of implementing mechanisms by describing a specific approach for a specific part of Alternative 5. If we make the desired USEPA distinction, we run the risk of confusing the public by creating the impression that a new alternative has been identified.*

*Although we think a new name for the alternative is inappropriate, we think the conservation framework must be included as part of the project if the project is approved. The framework will be reflected in the Final EIS/EIR description of Alternative 5, and will also be part of any project approval actions. As indicated in the July 7 memo (Item 1 – pages 2-3), the Preferred Alternative (in the FEIS) and the LEDPA concurrence request will include language on the conservation framework that forms the basis of Concurrence Point #4. If the SPRTA Board adopts Alternative #5, the conservation framework description will be included in the resolution of adoption. If FHWA selects it, this language will also be included in the ROD.*

*We believe our solution addresses the USEPA issue and is consistent with the intent of the conservation framework.*

## 2. Conservation Easement (CE) Holder – ‘City/County’ Concern

- Corps (Nancy Haley – 7.14.2009 email)  
Shares USEPA concern with terms. Suggests following revision:

**“If the easement will not be accepted by such non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be made to convey it to a federal agency or to a state governmental entity such as the California Department of Fish and Game. Failing that, with prior concurrence from the NEPA/404 MOU agencies, it may be held by any city, county, city and county, district, or other local governmental entity, if otherwise authorized to acquire and hold title to real property.”**

- USFWS – (Michelle Tovar -- 7.15.2009)

The language, among other things, would need to convey the purpose of the easement (for conservation). Also the sole purpose of the easement holder should be to hold easements. I doubt if any city, county, or state would agree to that. They must meet one or more of the following criteria: (1) accredited by the Land Trust alliance (<http://www.landtrustalliance.org/home-page>); (2) approved by CDFG; or (3) approved by the California Council of Land Trusts (<http://www.calandtrusts.org/>).

While we understand they can't guarantee at this point that they will find an NGO that would be willing and qualified to hold the CE on this, or that CDFG would hold it, it is inappropriate to suggest that a governmental entity would be acceptable alternative – this bullet point should be removed.

- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
EPA will accept the modified language as suggested by the transportation agencies in the attached document, with the addition of the following language,

**“If the transportation agencies are unable to find a non-profit conservation organization to hold the easement or have CDFG hold the easement, the agencies will work with EPA, Corps, and USFWS to ensure that an appropriate and capable organization is identified.”**

### Transportation agencies response:

*First, as we have expressed before, locking ourselves into too much detail at Tier 1 is not consistent with the January 23, 2009 meeting direction to pursue a conservation framework (or general approach). Trying to limit potential CE holders at Tier 1 may preclude options at Tier 2. We believe there will be ample opportunity to work out conservation framework details, including what entity holds the CE, during the Tier 2 process. Selecting, or eliminating, possible CE holders is premature at the framework stage.*

*We understand that the resources agencies have a concern with a local jurisdiction being a CE holder. . Although no reason for this is stated in the resource agency comments, it appears that the agencies are concerned that local jurisdictions would fail to enforce an easement, notwithstanding the fact that the restriction on access was proposed by the local jurisdictions and that all of the modified NEPA/404 MOU agencies and local jurisdictions agree that we want to limit the potential for new interchanges.*

*Although we do not agree that local governments should be excluded as potential CE holders, nor do we urge that they take that role. As expressed in the July 8 email, it is clearly our intent, in the Tier 2 process, to identify a non-profit organization as the CE holder. Only if that is not feasible would we seek another CE holder, and then the first priority would be to convey the CE to a federal agency or to a state entity, with local jurisdictions CE holders of last resort (see July 7 memo – Item 2 – pages 2-3.) Closing off the potential now for a local jurisdiction to be a potential CE holder raises the concern about what happens if there is no one else to hold it. We do not want the easement provision to fail for lack of an entity willing to hold the easement. We believe preserving (vs. eliminating) potential CE holders at Tier 1 is consistent with the intent of the conservation framework.*

*We believe our July 7 memo addresses the resources agencies' concern and is consistent with the intent of the conservation framework.*

### 3. Airspace rights (vertical rights).

- Corps (Nancy Haley – 7.14.2009 email)  
Easement suggested language: “The covenant not to allow access will include a specific prohibition regarding interchange structures in the airspace over the property.”

This needs to be extremely clear prior to the end of Tier 1. I would like to know what that “specific prohibition” language is.

- USFWS – (Michelle Tovar -- 7.15.2009)  
The language, among other things, would need to convey the purpose of the easement (for conservation)....And, we also need to review specific language on the airspace prohibition. So bottom line: In the absence of easement language itself, we can not “approve” or “concur” on this list of terms. Although not required to concur, we will make our concerns known now.
- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
It is the understanding of the resource agencies that specific language would be provided as part of the framework. The transportation agencies explained in two previous meetings that conservation easements could be of minimal width because the rights that the easements purchase extend vertically into the air above the ground specified in the easement. The natural resource regulatory agencies responded that we are unfamiliar with these “vertical rights” and would like our solicitors to review that legal language before we feel comfortable that easements of a minimal width, such as 25 feet, could prevent construction of additional access, in the form of aerial structures. With respect to the suggested language, it is clear that the Grantee has the right to prevent activities inconsistent with the purpose of the easement but it is not clear in the language suggested that the Grantee has a responsibility to prohibit activities contrary to the purpose of the easement. We would like the language regarding vertical rights, if such language exists, provided before any request for concurrence on the corridor most likely to contain the LEDPA so that our legal staff can review it.

#### Transportation agencies response:

*Again, we are concerned that debating specific language in a conservation easement is inconsistent with the intent of the January 23, 2009 meeting direction to pursue a conservation framework. Even so, in response to resource agency comments we did provide draft language which specifically addresses the issue of construction in the airspace of the land covered by the easement. Language on this issue was provided in the July 7 memo (Item 3 – page 3). It included – “The following language, or substantially similar language, is intended:*

***Grantee has the right to prevent any activity on or use the Property that is inconsistent with the Purpose of this Conservation Easement, including but not limited to the construction of any structures under, over, around or through the Property intended to provide access to the adjacent highway known as Placer Parkway, including but not limited to interchanges.”***

*We believe the suggested language addresses the resources agencies' issue and is consistent with the intent of the conservation framework.*

**4. Minimum buffers.**

- Corps (Nancy Haley – 7.14.2009 email)  
No issue identified.
- USFWS – (Michelle Tovar -- 7.15.2009)  
No issue identified.
- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
**Our concern about minimum buffers on either side of the roadway is related to the issue of preventing aerial structures that might connect to the roadway from beyond the buffer. If we were given a level of certainty, through the inclusion of specific easement language, as discussed above, the specific buffer widths would not be a significant issue for EPA. The Corps of Engineers generally requires a 50' buffer for onsite preserves that avoid aquatic resources associated with CWA Section 404 permits.**

*Transportation agencies response: The suggested language in Item 3 (above) addresses the resources agencies' airspace/interchange issue. So, the width (outside of the corridor) should not be a big concern. The 25-foot-wide buffer (outlined in the July 8 email and attachment – Item 4 – page 3) was deemed adequate because it would ensure an adequate area for access and maintenance.*

*We believe the 25-foot width addresses the resources agencies' issue and is consistent with the intent of the conservation framework.*

**Placer Parkway Corridor Preservation Tier 1 EIS/EIR**  
**Final Meeting Notes -- August 5, 2009**  
**FHWA Huntington Conference Room, 650 Capitol Mall, Sacramento**

**Attendees**

Gary Sweeten	FHWA	Jason Brush	USEPA (phone)
Celia McAdam	PCTPA	Loren Clark	Placer Co Planning
Stan Tidman	PCTPA	Chris Collison	Caltrans
Steve Propst	Caltrans	Jana Milliken	USFWS
Laura Walsh	Caltrans	Michelle Tovar	USFWS
Connell Dunning	USEPA	Denise Heick	URS
Carolyn Mulvihill	USEPA	Steve Leach	URS
Dave Smith	USEPA (phone)	Jeff Glazner	North Fork Assoc

**Meeting objective:** 1) To reach consensus on the framework, which will allow **Alternative #5** to be identified as the corridor most likely to contain the LEDPA, 2) to get input on the draft LEDPA concurrence request letter, and 3) to determine what is an appropriate Mitigation Framework (Concurrence Point #5) for this Tier 1 corridor preservation project.

**1. Introductions**

Gary Sweeten opened the meeting. Introductions were made (see above for meeting participants, and attachment for Sign-In Sheet).

**2. Final May 29, 2009 Meeting Minutes**

There were no additional comments on the Final May 29, 2009 meeting minutes.

**3. Consultation Process Status**

Stan Tidman recapped the consultation process status. To date, through the modified NEPA/404 Process, the first three concurrence points have been completed:

- #1 Purpose and Need (2005)
- #2 Criteria for Selecting the Range of Alternatives (2005)
- #3 Range of Alternatives (2006)

The last regular modified NEPA/404 process meeting was held on July 17, 2008. At it, the transportation agencies June 2008 LEDPA concurrence request was discussed and resources agencies' concerns with it. The resources agencies provided a formal non-concurrence letter on August 14, 2008. Since then the following meetings have been conducted:

- 10.15.2008 - Informal (Mid-level managers) Elevation Meeting -

- 1.23.2009 - Formal (Senior-level Managers) Elevation Meeting

At the Formal elevation meeting, it was agreed to suspend the LEDPA Concurrence dispute process to explore the feasibility of a 'conservation framework'. This framework, to be implemented in Tier 2, would identify Alternative #5 as the corridor mostly likely to contain the LEDPA. The conservation framework process, to date, consisted of:

- April 17, 2009 Conservation Framework Meeting #1 -- Placer Parkway Alternative 5 LEDPA Options that avoid growth inducing impacts to ESA and CWA resources, provided by resources agencies.
- May 11, 2009 email from Stan Tidman -- Conservation Framework Meeting Follow-up
- May 29, 2009 Conservation Framework Meeting #2 -- Final Meeting Notes
- June 12, 2009 email from Denise Heick (on behalf of the transportation agencies) -- Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway (easement term sheet for resources agencies' review - bullet list and pdf of map).
- June 26, 2009 email from Erin Foresman, USEPA -- responding to easement term sheet
- July 7, 2009 memo from Stan Tidman -- Transportation agencies' Response to Erin Foresman feedback (emailed on July 8).
- July 14, 2009 email from Nancy Haley, USACE -- feedback
- July 15, 2009 email from Michelle Tovar, USFWS -- feedback
- July 21, 2009 email from Carolyn Mulvihill, USEPA -- feedback
- July 23, 2009 phone call -- Nancy Haley and Stan Tidman -- CE Holder issue & Airspace Rights clarification
- July 31, 2009 -- Transportation Agencies' CE Responses to July 2009 Resources Agencies' Feedback

#### **4. Conservation Framework Agreement**

The July 31, 2009 Transportation Agencies CE Responses to July 2009 Resources Agencies' Feedback document was used as the discussion document for this agenda item (copy attached)

Item 1 -- Future documentation for LEDPA concurrence request and FEIS's Preferred Alternative: Dave Smith stated that the transportation agencies' response was ok. There was no disagreement on this point.

Item 2 -- Conservation Easement (CE) Holder -- "City/County" Concern: Discussion on this item ensued.

USFWS is concerned that the ESA compliance easement needs to be held by a entity accredited by the Land Trust alliance, approved by CDFG, or approved by the California Council of Land Trusts. Jana Milliken stated that it was inappropriate for the easement to be held by a city or county. She noted, however, that USFWS is not a concurring party



to the modified NEPA/404 process. Loren Clark responded that Placer County holds lots of ESA easements, and that the PCCP is structured for them to take even more responsibility. Gary Sweeten and Chris Collison noted that the primary purpose of the conservation easement for Placer Parkway was not for purposes of ESA compliance, it was conservation of open space, agriculture, and related uses for purposes of preventing access to the Parkway.

USACE and USEPA are concerned that they have input on and concur with the eventual easement holder. The transportation agencies are concerned that the Tier 2 process not be held up or not be able to be completed if the NEPA/404 agencies do not find any potential jurisdictional easement holders acceptable. Celia McAdam noted that the transportation agencies don't want to unduly tie the hands of the agencies in Tier 2, and that more general language would be more appropriate. The following language, to replace bullet number 5 in the "Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway" was accepted by all parties:

If the easement will not be accepted by such non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be to convey it to a federal agency or to a state government entity such as the California Department of Fish and Game. Failing that, the NEPA/404 agencies will work together through the NEPA/404 process to identify and to concur on an acceptable conservation easement holder.

Item 3 - Airspace rights (vertical rights): Dave Smith said that it was a fundamental principle that the easement holder would have an obligation to enforce the buffer. Denise Heick said that it was her understanding that this specific language was inconsistent with the California State Civil Code Section 815. After discussion, the language in the last two bullets in the "Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway" was reviewed. This language appeared to resolve the concerns of USACE, USEPA, and USFWS. Nancy Haley will review with USACE counsel, and if she is okay with this language, all parties agreed that no changes were needed.

Item 4 – Minimum Buffers: This item is ok, based on the transportation agencies' response. It was clarified that the 25-foot buffer was for the purpose of restricting access; there could be other buffer requirements related to distance from adjacent resources, e.g., streams that could require a larger buffer, depending on design.

## **5. LEDPA Concurrence Request & Required Content**

Connell Dunning provided input on the LEDPA concurrence request package, and Nancy Haley agreed. She suggests a cover letter requesting concurrence on Alternative 5, summarizing the major items agreed to as part of the concurrence process. The package would consist of the following:

- Cover letter, referencing June 8, 2009 request for concurrence letter, with revisions as described in Chapter 4 of the Final EIS, and referencing the four items discussed at this meeting
- Summary of agreed information being made part of the project description in the FEIS
- June 12, 2009 “Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway”
- July 7, 2009 memo from Stan Tidman – Transportation Agencies’ Response to Erin Foresman feedback (emailed on July 8)
- July 31, 2009 Transportation Agencies CE Responses to July 2009 Resources Agencies’ Feedback
- These meeting minutes

Connell agreed to review a draft copy of these materials prior to their formalization. Gary Sweeten noted that the modified NEPA/404 MOU for Placer Parkway allowed for bundling concurrence points #4 and #5 together into one request, and asked if that were possible. Dave Smith said, in principle, he was no reason why they couldn’t be combined, but a decision was premature. He suggested revisiting this suggestion after the agenda item dealing with concurrence point #5 was completed.

#### **6. Mitigation Framework – Concurrence Point #5**

All parties agreed that the mitigation framework should be general at this Tier 1 stage. The Mitigation Framework will include the following:

- Summary of mitigation considerations and mitigation commitments to follow in Tier 2, from the Tier 1 EIS/EIR as appropriate (biology, water quality, hydrology)
- Acknowledgement that preferred compensation would be through the Placer County HCP/NCCP, if available
- Acknowledgement of the Compensatory Mitigation for Losses of Aquatic Resource; Final Rule (40 CFR Part 230, April 10, 2008) and its hierarchy of preferred compensation:
  - Mitigation banks
  - In-lieu fees
  - Permittee-responsible
- General discussion of mitigation opportunities, if the PCCP were not available, including opportunities to build on existing conservation
- Intent to work with the resource agencies to identify appropriate mitigation
- Reiterate that the no-access buffer is not intended as part of compensatory mitigation

USFWS noted that they prefer permittee-responsible compensation before in-lieu fees; Gary Sweeten said that FHWA did, also.

It was agreed that a draft of this framework could be drafted quickly for review by the resources agencies, and that it could be included in a combined request for concurrence along with concurrence point #4.

#### **Action Items**

1. **Nancy Haley** to check with USACE counsel regarding acceptability of the language in the last two bullets in the “Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway” was reviewed.
2. **Denise Heick** to draft Mitigation Framework, for review
2. **Denise Heick** to draft materials for the request for concurrence letter, for review.

#### **Attachments:**

- Sign-In Sheet
- July 31, 2009 – Transportation Agencies CE Responses to July 2009 Resources Agencies’ Feedback

PLACER PARKWAY NEPA 404 MEETING

650 Capitol Mall  
Sacramento, CA

NEPA/404 Meeting - August 5, 2009

Name	Initial	Organization	Phone Number	E-mail address
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**Appendix A3**  
**Terms of a No-Access Easement for the Buffer Area**  
**Adjacent to Placer Parkway**

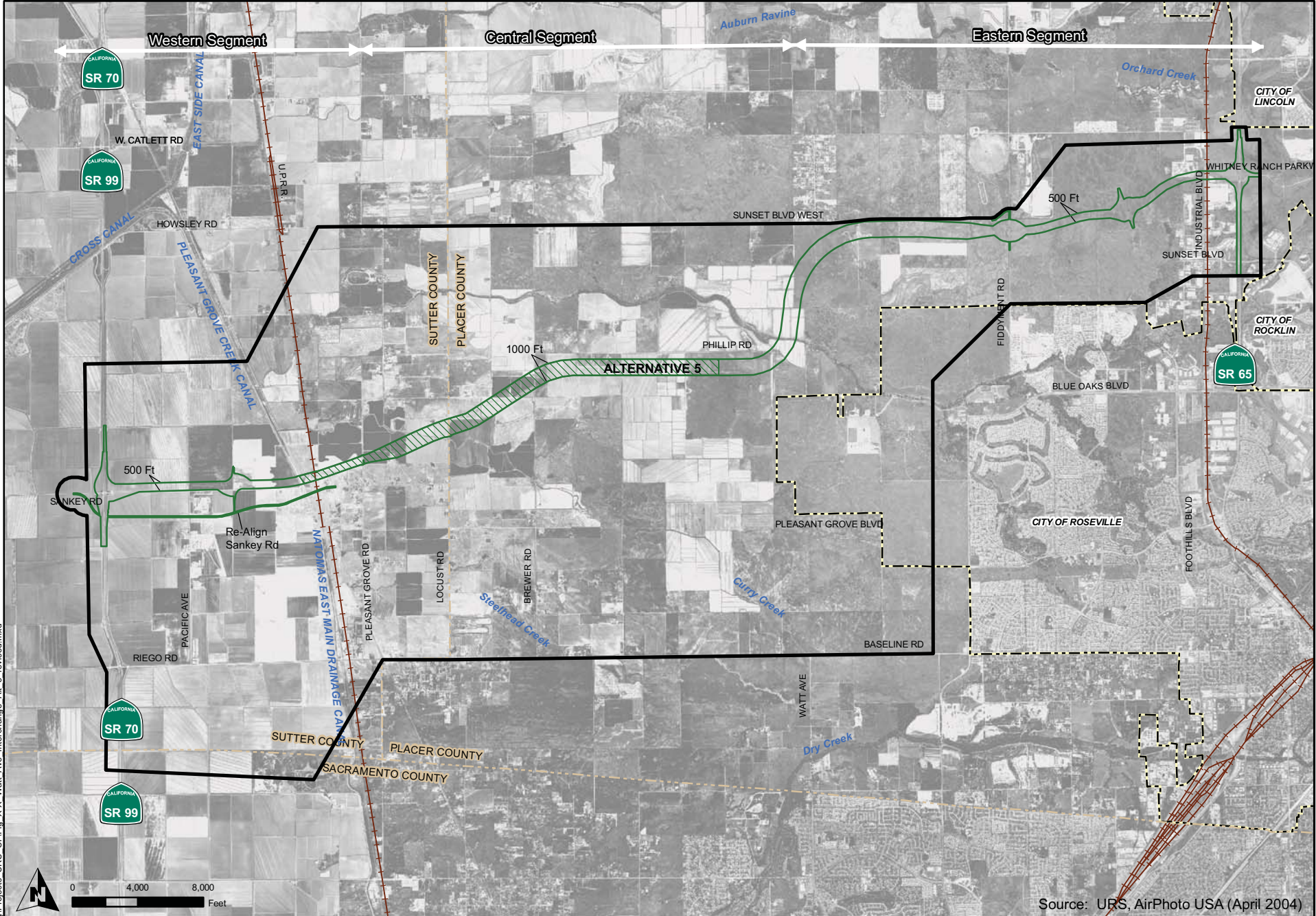


## APPENDIX A3

### TERMS OF A NO-ACCESS EASEMENT FOR THE BUFFER AREA ADJACENT TO PLACER PARKWAY

The following briefly outlines the attributes of an easement that could be used as a vehicle to preclude interchanges along proposed alternative 5 for the proposed Placer Parkway from 3,250 feet west of the western boundary of the Reason Farms Retention Basin panhandle to the Natomas East Main Drainage Canal, as shown on the attached figure.

- The easement will be in the form of a conservation easement created pursuant to California Civil Code Section 815.
- The easement will be perpetual in duration. The no-access provision will be binding on successive owners for the purpose of retaining the land predominantly in its natural, scenic, historical, agricultural, forested or open-space condition. (Cal. Civ. Code §§815.1, 815.2.)
- Instrument creating the conservation easement will be recorded in the county where the land is located. (Cal. Civ. Code §815.5.)
- The easement will be held by a tax-exempt nonprofit organization qualified under Section 501(c)(3) of the Internal Revenue Code and qualified to do business in California which has as its primary purpose the preservation, protection, or enhancement of land in its natural, scenic, historical, agricultural, forested, or open-space condition or use.
- If the easement will not be accepted by such non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be to convey it to a federal agency or to a state government entity such as the California Department of Fish and Game. Failing that, the NEPA/404 agencies will work together through the NEPA/404 process to identify and to concur on an acceptable conservation easement holder.
- The terms of the easement may be enforced in court, and violation of the easement may result in damages, including the cost of restoration.
- Under Subdivision Map Act, city or county must generally deny approval of a tentative map if the land is subject to an open-space easement, agricultural conservation easement, or conservation easement.
- Easement will include Grantor's covenant not to allow access to right of way from adjacent land, and not to participate in planning or construction of interchange(s) between highway project and any surface streets from 3,250 feet west of the western boundary of the Reason Farms Retention Basin panhandle to the Natomas East Main Drainage Canal. Easement to expressly provide that covenant is specifically enforceable. May also identify certain third party beneficiaries with right to enforce covenant.
- The covenant not to allow access will include a specific prohibition regarding interchange structures in the airspace over the property.



Source: URS, AirPhoto USA (April 2004)

L:\GIS\Placer\_Parkway\Projects\_URS\_SF\Fig\_X-X\_Watt\_Ave\_Interchange\_Alt\_5\_revised.mxd

- Study Area Boundary
- City Boundary
- County Boundary
- Multiple Easements



Tier 1 EIS/EIR

## Alternative 5 - Corridor Most Likely to Contain the LEDPA

*Figure A-1*

**August 2009**

\* Note: Watt Ave Interchange is not part of project and may be constructed in the future by others.



**Appendix A4**  
**Summaries of Meetings Since June 2007**



## **SUMMARY OF THE NEPA/404 CONSULTATION PROCESS FOLLOWING PUBLICATION OF THE PLACER PARKWAY DRAFT TIER 1 EIS/EIR**

The Placer Parkway Draft Tier 1 EIS/EIR provided a summary of the National Environmental Policy Act (NEPA)/404 consultation process, including summaries of meetings held between August 21, 2003 and October 23, 2006. As of October 12, 2005, agency concurrence had been obtained on Concurrence Points 1, 2, and 3. The information below summarizes subsequent meetings, which occurred between June 1, 2007 and August 5, 2009.

### **COORDINATION MEETING #17 – June 1, 2007**

Meeting participants included representatives from U.S. Army Corps of Engineers (USCOE), U.S. Environmental Protection Agency (U.S. EPA), Federal Highway Administration (FHWA), U.S. Fish and Wildlife Service (USFWS), California Department of Transportation (Caltrans), Placer County Transportation Planning Agency (PCTPA), Placer County, DKS Associates, and URS Corporation.

The meeting objectives were to continue modified NEPA/404 process coordination—specifically to obtain feedback from the resource agencies on two drafts—the MEPLAN Analysis and the Land Use and Policy Scenario as well as to continue discussion on the proposed Placer Ranch Specific Plan. Resource agencies' attendance was to help (1) identify any revisions to the drafts before the Tier 1 EIS/EIR was circulated for public review, and (2) share concerns (and possible solutions) related to processing the proposed Placer Ranch Specific Plan. Agenda items included:

- Introduction
- Approval of October 2006 Meeting Minutes
- Consultation Process Status
- Action Items from the October 23, 2006 Meeting
- Project Update
- Draft MEPLAN Analysis
- Draft Land Use and Policy Scenario
- Questions and Comments
- Placer County Coordination

The MEPLAN model was used by the Sacramento Area Council of Governments (SACOG) and the University of California at Davis (U.C. Davis) for use on the Blueprint project's Base Case and the Mineta Report. The MEPLAN model is an integrated land use and transportation model that forecasts the influence of transportation conditions on local land use development and the impacts of land use development on transportation conditions.

The MEPLAN work for Placer Parkway focused on a land use analysis in the six-county SACOG region based on Regional Analysis Districts (RADs) in five-year development increments to 2040. All factors in the model were held constant except for the Placer Parkway. The model considered the northern (Alternative 5) and southern (Alternative 1) corridor alignments – with and without Watt Avenue, with the objective of identifying how the location of an alignment might change allocation of development within the six-county region.

In the Parkway study area, the model predicted that there would be an increase of approximately 1,000 to 1,200 households with the Parkway. This represents a 0.4 percent increase. There would be a corresponding decrease in the rest of the SACOG region. Compared to the No-Build

Alternative, the MEPLAN analysis indicated that the Parkway would add approximately 1,800 to 2,000 jobs to the vicinity—with a corresponding decrease over the remainder of the region. The Parkway’s influence would be greater for jobs than on housing and change in future projected development would be relatively low.

Caltrans commented that MEPLAN appeared to be an objective measure. U.S. EPA indicated the draft’s introduction really helped. Further review would be required. U.S. EPA was impressed with extra steps taken and suggested that a next logical step would be an analysis of where growth occurs in relation to resources. It was explained that the MEPLAN analysis using RADs could not be made more specific. This agenda item concluded with participants stating that the summary was useful and they would study it further.

A Draft Land Use and Policy Scenario was developed as part of the requirement under Concurrence Point 3, Range of Alternatives. It is a theoretical scenario under which travel demand would be reduced by maximizing transit use and urban density. The analysis looked for applicable assumptions regarding robust transit, development, and smart growth tools. SACOG’s 4D post-processor was selected for use as it tries to capture the Blueprint’s smart growth principles. The analysis assumes all jurisdictions follow the SACOG Blueprint principles. It assumes denser development served well by transit, with more walk/bike opportunities. Under the scenario, the model asks where those opportunities would occur within the region. It focuses on new growth areas, especially near existing development, and infill properties. It assumed the Parkway would not be constructed.

The scenario’s basic conclusions were:

- a. There would be lots of change at a local level, with more people walking and biking shorter distances. Under the scenario there would be more change in new growth areas such as the proposed Placer Vineyards and Sierra Vista Specific Plans on collector roadways than on the arterial street system (10 percent more in some cases).
- b. Baseline and Riego Roads would experience a 2 to 6 percent traffic volume decrease (diversion of trips from automobile to transit), depending on the segment. These changes would be greatest in the a.m. and p.m. peak periods. Other major roadways would have similar but smaller changes, in the 2 to 4 percent range.
- c. There would be fairly high increases in transit use (more than double the ridership projected by SACOG) focused in smaller areas.

Nancy Levin (U.S. EPA) asked whether parking and congestion pricing were considered infeasible. John Long (DKS Associates) explained that SACOG assumes some of this in the center city area and in high employment areas such as Roseville and Rancho Cordova. The scenario and its analysis built off this with no additional assumptions. Nancy asked whether any other constraints were considered beyond SACOG’s. John replied “no,” because applying this approach is difficult to rationalize in suburban areas. It is difficult to implement, as people are very creative about getting around congestion pricing and it is difficult to put collection facilities in place because there are lots of on- and off-street parking choices.

The Placer County Coordination item was an update of an issue identified at the previous meeting, regarding potential conflicts between the Placer Parkway buffer areas and the Placer Ranch Specific Plan (PSRP) proposed land use map. Placer County said that PRSP was asking for land use entitlements within the 1,000-foot buffer proposed by the Parkway. There have been several meetings and discussions on this issue. County staff is pursuing a compromise involving

an alternative land use plan in the Placer Ranch Environmental Impact Report (EIR). Under the alternative, the PRSP developer would do their best to identify the Least Environmentally Damaging Practicable Alternative (LEDPA) for the Parkway roadway east of Fiddymment Road—about 1½ miles. The developer would do a project level analysis for the portion of the Parkway located in the PRSP area. A 500-foot corridor (more or less) would be dedicated to the east of Fiddymment Road, with the rest of the alignment (to the west) having a 1,000-foot corridor. The developer would receive conditional entitlements for the area of the corridor outside of the land needed for the Parkway (essentially the buffer areas), with conditions.

USCOE expressed concern about other projects coming down the road, and that other developers would be similarly aggressive in wanting to develop with the Parkway's buffer areas. Caltrans asked if the Parkway approval wouldn't preserve an alignment. It was clarified that this would not occur until the Tier 2 process is completed. USCOE said that to some extent the PRSP EIR could undermine three upcoming environmental impact statements (EISs). USCOE expressed concern that Placer Ranch is not doing a joint NEPA/California Environmental Quality Act (CEQA) document.

FHWA questioned the effect of the PRSP EIR's compromise alternative on the Parkway's Tier 1 EIS/EIR. Placer County asked the agencies to communicate further on this issue, and expressed the importance of open communication.

#### **COORDINATION MEETING #18 – November 7, 2007**

Meeting participants included representatives from USCOE, U.S. EPA, FHWA, Caltrans, PCTPA, Placer County, City of Roseville, DKS Associates, Mara Feeney & Associates, Koegel and Associates, and URS Corporation.

The meeting objective was to continue modified NEPA/404 process coordination—specifically to review the U.S. EPA comment letter on the Draft Tier 1 EIS/EIR. Resource agencies' attendance was to help (1) get a better understanding of comment letter conclusions/recommended actions, (2) share Draft Tier 1 EIS/EIR background, and (3) get specific guidance to address U.S. EPA issues in order to complete the Final Tier 1 EIS/EIR and to identify the LEDPA. Agenda items included:

- Introductions
- Approval of June 1, 2007 Meeting Minutes
- Consultation Process Status
- Action Items from the June 1, 2007 Meeting
- Project Update
- Discuss the September 25, 2007 U.S. EPA Comment Letter
- Other Items
- Action Items

The meeting facilitator clarified, with meeting participants, a number of process-related issues, including:

- The alternative most likely to contain the LEDPA should be identified before the Final Tier 1 EIS/EIR is circulated.
- The preferred alternative and the LEDPA should be the same. It would be to everyone's advantage to pick the corridor alignment alternative that is likely to contain the LEDPA.

- FHWA would formally request concurrence on the LEDPA (in a manner similar to the first three concurrence points). If agreed, USCOE and U.S. EPA would provide concurrence letters. Should concurrence not be reached, the Memorandum of Understanding (MOU) outlines elevation procedures to expedite the decision-making process. The elevation process maybe seen as a positive sign – to expedite the problem and to resolve it.
- U.S. EPA asked that the comment letter issues be addressed in the Final Tier 1 EIS/EIR.

Discussion on the U.S. EPA comment letter focused on the following categories:

1. *Interchange Concept/Buffer Concept* – FHWA stated that its understanding of the comment letter was that U.S. EPA was seeking a guarantee that additional interchanges would not be part of the project. FHWA could not guarantee this. It cannot legally preclude the right of local jurisdictions to make land use decisions.

USCOE expressed concern that the Parkway concept as a limited access facility with a no-development buffer was already being eroded by proposed projects such as Placer Ranch. PCTPA reiterated that the limited access and buffer zone policies were rooted in the preliminary planning documents. This concept was reaffirmed by the project’s Technical, Study, and Policy Advisory Committees (TAC, SAC, and PAC). The work did point out some ambiguities with both policies that were clarified. Specifically, in the Tier 2 process, buffer width in agricultural areas undergoing urban development could be reviewed based on performance standards.

U.S. EPA agreed that there could not be any guarantees about future new interchanges, although there are some potential tools to discourage them. U.S. EPA considers that if these project concepts are not reasonably foreseeable, then the analysis should not assume that they would be in place. Environmental benefits that would accrue as a result of the buffer as currently proposed should not be assumed if there is the possibility that the buffer may be modified or eliminated. In addition, USCOE suggested that if interchanges cannot be limited, then the document should state this. If there are reasonably foreseeable assumptions that can be made regarding the ability to limit interchanges, than they should be laid out in the document.

Nancy Levin (U.S. EPA) inquired as to the location of the Eastern Segment, which appeared to have shifted since the initial discussions for the project. It was explained that the segment boundaries had been shifted to ensure that the portion of alignment common to all alternatives was included in one segment, for clarity of analysis. The language in the document was modified to state that no interchanges were proposed between Pleasant Grove Road and Fiddymont Avenue, which was the original concept. There was no intent to modify the extent of the no-interchange concept.

The document will be revised to acknowledge what is likely and foreseeable. Future development pressure on the buffer zone will be acknowledged. The team will look at the document to check where beneficial effects to the buffer have been claimed and will clarify language to explain that these benefits are not

guaranteed. The discussion of this issue will be expanded in the growth inducement discussion, as more access could mean more growth Nancy clarified that U.S. EPA don't expect additional detailed analysis, e.g., a new MEPLAN analysis.

2. *Secondary/Indirect/Cumulative Effects* – U.S. EPA said the Draft Tier 1 EIS/EIR covered direct impacts. Indirect impacts, particularly fragmentation, might be significant depending upon the alternative. This could have a big influence on the LEDPA. It was suggested and agreed that growth-inducement clarifications would be discussed before secondary/indirect impacts.

U.S. EPA was very impressed with the different methods used in the Draft Tier 1 EIS/EIR to analyze growth. They said this is something rarely seen in EISs. The Draft Tier 1 EIS/EIR's conclusion that the project would be growth inducing was done very well. U.S. EPA's prime concern is the effect of growth on resources and habitat. Their focus is to identify any differences among corridors. They are looking for more information to support the conclusions presented in the document—i.e., that there would be little difference among alternatives. In particular, they would like to see a more detailed discussion of differences in growth inducement potential among the proposed alternatives and what that would mean for potential habitat fragmentation. If possible, it would be helpful to find a way to use quantitative as well as qualitative analysis.

U.S. EPA said that it seemed that the Draft Tier 1 EIS/EIR concluded that there were no meaningful differences among alternatives in the areas of indirect effects and habitat fragmentation. U.S. EPA stated that there was no support for this conclusion. For instance, it seemed that the farther north an alternative was located, the more likely it would affect undisturbed habitat. So, an alternative closer to development would be less harmful and less fragmenting.

FHWA asked if U.S. EPA and USCOE felt comfortable with the MEPLAN approach. USCOE replied there was no problem with the approach—just a different perception of the results. U.S. EPA clarified things by saying the document needs more discussion to support the conclusion that there is no real difference among the alternatives.

3. *Land Use and Policy Scenario* – The original intent was to see how future traffic demand could be met without the Parkway. The scenario was not intended to be an alternative, but it would illustrate the kind of measures required to avoid the need for a new highway. U.S. EPA had been looking for a more aggressive approach to the development of a hypothetical scenario, which went beyond SACOG's Blueprint. There had been confusion about its intent.

It was explained that a number of components beyond Blueprint were included in the scenario. These included a visionary approach for transit (not just current plans) and SACOG Blueprint smart growth tools for greenfield, infill, and redevelopment areas. The scenario assumed a very robust transit system and a high level of walk/bike trips. The findings showed that the approach would help short trips on local roads but would not have any major benefits on the regional roadway system. The scenario reflected the intent of going beyond the Blueprint. If additional discussion (not analysis) were required to address U.S. EPA concerns, limiting land use would be the only option. From a planning and

modeling perspective, it would be difficult to take away development that was already entitled.

U.S. EPA asked about increasing densities. It was explained that the analysis assumes increases. If there were additional density, it would also primarily affect the local rather than the regional system. This would be consistent with the SACOG analysis. The approach that the team had taken was to implement a wide range of measures to see how far one could go in reducing travel demand, but the findings were that this would not eliminate the need for the Parkway, as the project is needed to serve future growth. U.S. EPA said no additional analysis would be required.

U.S. EPA advised the project team to focus on completing the information needed to determine the LEDPA. It was agreed that informal discussion could occur during preparation of this information and that draft information would be sent to U.S. EPA and USCOE prior to scheduling a meeting to discuss. U.S. EPA agreed that the requested LEDPA information could be summarized in a letter that would address the indirect effects issues raised by U.S. EPA.

### **COORDINATION MEETING #19 – July 17, 2008**

Meeting participants included representatives from USCOE, U.S. EPA, FHWA, Caltrans, PCTPA, Placer County, City of Roseville, DKS Associates, Mara Feeney & Associates, Koegel and Associates, and URS Corporation.

The meeting objective was to continue the modified NEPA/404 process coordination – specifically to reach concurrence that Corridor Alignment Alternative 5 is most likely to contain the LEDPA.

Resource agencies attendance will help (1) determine whether the Draft LEDPA Recommendation Concurrence Request (distributed on June 25) is acceptable to all resource agencies as written or to identify modifications, and (2) clarify the remaining project milestones/timelines—in order to complete the Final Tier 1 EIS/EIR and the modified NEPA/404 process. Agenda items included:

- Introductions
- Approval of November 7, 2007 Meeting Minutes
- Consultation Process Status
- Project Update
- LEDPA Concurrence Request Letter
- Other Items
- Action Items

The South Placer Regional Transportation Authority (SPRTA) Board held a public workshop on Parkway progress in February 2008. The board received a briefing on the November 7, 2007 meeting and subsequent additional analyses. In March, the Board directed the staff to focus on the preparation of a new chapter for the EIS/EIR, which would be circulated for public comment. This chapter would include the additional analyses prepared as a result of the November 7 meeting. The aim of this was full public disclosure to allow for a transparent environmental review process, and to provide a stronger foundation for the Tier 2 stage.



URS provided an overview of the LEDPA concurrence request. The FHWA letter contained a summary of the points supporting Alternative 5 as the LEDPA. The letter's three attachments were then described.

*Attachment A* – Additional Analysis of Growth Inducement Potential was summarized first. One of the key aspects of the additional analysis was to focus on areas termed “Potentially Developable Land” (PDL) within one mile of any potential or hypothetical interchange and also within one mile of each entire corridor alignment alternative. PDL comprised all available land subject to growth-inducement pressure. The results of the analysis indicated that land within one mile of the northern corridor alignment alternatives had less PDL than the three southern ones. These results were similar to the Draft Tier 1 EIS/EIR conclusions. Alternatives 4 and 5 had less potential growth inducement than Alternatives 1, 2, and 3. [**Note:** subsequent revision of this information identified that Alternative 1 would have 17 fewer acres of PDL than Alternative 5 – statistically virtually identical, which confirmed the findings in the Draft Tier 1 EIS/EIR.]

U.S. EPA expressed a concern about areas farther than one mile from the interchanges and corridor edges. USCOE added that if Alternative 5 were chosen, everything from Baseline Road to the north would fill in with development. It was explained that much of the “infill” development is already planned and/or approved for development and is likely to go ahead irrespective of the Parkway. The one-mile distance was based on widely accepted professional guidance set out in the National Cooperative Highway Research Program Report (NCHR), which U.S. EPA referred to in their September 2007 Draft Tier 1 EIS/EIR comment letter. A greater distance would begin to blur any distinction between alternatives, as the corridors would overlap. It was emphasized that U.S. EPA had recommended the use of the NCHRP reference for the additional analyses.

U.S. EPA was interested in the pattern and distribution of growth and the effect of this on resources, in particular on aquatic resources and habitat fragmentation. They stated that the farther north an alternative was located, the more likely it would be to affect undisturbed habitat—the type most worth preserving. So, an alternative closer to development would be less harmful and fragmenting.

Based on the City of Roseville's experience, its representative pointed out that growth pressures were greater nearer to existing services. It was too expensive to extend infrastructure where there are no adjacent services. The City's retention basin would also be a factor in restricting growth. Alternative 5 would still be Roseville's preference. All of the alternatives would improve Roseville traffic congestion by varying degrees; but, as the Parkway shifts closer to Baseline, it would be used for shorter trips rather than for longer distance trips.

FHWA said Alternative 5 would be the shortest alternative by approximately two miles. It would have fewer interchanges, and it would be the least expensive to finance and to construct. FHWA, using the Planned/Proposed Development map, indicated that development pressure already existed on the edges of and in the study area. Roseville's retention basin would limit growth. Roseville said the proposed Sierra Vista Specific Plan was finding it harder to extend infrastructure. Along Baseline Road, infrastructure does exist to facilitate development. A number of potential service providers or jurisdictions from which service could be provided were identified (Placer County, Elverta Specific Plan, etc.). However, it would be much more difficult to extend water services to the north.

FHWA asked how far apart the resource agencies were regarding the LEDPA Concurrence Request. The project team did want to address U.S. EPA's concerns but the process had to continue to move forward. Financial and time limitations were becoming more of an issue.

U.S. EPA introduced the “elevation” process (from the 1993 NEPA/404 MOU) consisting of informal and formal dispute resolution meetings. The informal process would involve U.S. EPA and USCOE mid-level managers. If the informal process were not successful, the formal process would involve the U.S. EPA Regional Administrator and the USCOE Division Engineer. The formal process would be based on a combined briefing paper explaining the main areas of disagreement and how to move forward. The paper would be developed by the agencies and project team together.

USCOE suggested that the project team could proceed without LEDPA concurrence. It was explained that the team was aware of this; but, the objective of the lengthy Tier 1 process had been to involve agencies throughout so that concurrence could be reached. A schedule of dates/actions was agreed to as steps in the elevation procedure.

*Attachment B* – Additional Analysis of Secondary and Indirect Impacts on Biological Resources was summarized for the resource agencies. The additional work for secondary/indirect impacts was built on the PDL concept outlined in Attachment A’s growth analysis. The analysis addressed the USCOE request for a more quantitative analysis. The findings were consistent with those presented in Attachment A. The secondary and indirect impacts analysis also suggested that secondary and indirect impacts, including growth and habitat fragmentation, would be generally lowest under Alternative 5 and highest under Alternatives 1, 2, and 3. The southern alternatives were longer than Alternatives 4 and 5 and there are more habitat areas in the south.

The additional analysis for habitat fragmentation was primarily based on the number of stream crossings made by each alternative, as preservation of stream corridors was one of the main conservation measures identified in the PCCP, and the size of viable habitat as defined by technical experts working on the PCCP. The analysis of stream crossings suggests that Alternatives 4 and 5 would likely have less potential to fragment stream corridors and existing habitat linkages. Minimizing stream crossings and barriers to wildlife movement would support the objectives of maintaining future reserve linkages highlighted in the regional LEDPA approach for the proposed PCCP. The analysis also identifies that Alternative 1 would have the highest potential for fragmentation effects associated with stream crossings.

*Attachment C* – Additional Analysis of Cumulative Impacts was summarized. This analysis focused on putting the potential contribution of the Parkway in a range of historical to future contexts. It acknowledged extremely high levels of historic losses of wetlands and vernal pools in the study area, which included the proposed areas of both the PCCP and the Natomas Basin Habitat Conservation Plan. Findings indicated that the Parkway made a very small contribution to cumulative impacts on wetlands and vernal pools. The majority of future losses would be attributable to other projects in the study area, most notably the expansion of the City of Lincoln. However, the Parkway impacts, although very small (less than 1 percent of all projected future losses for any of the corridor alignment alternatives), were still considered potentially significant in the context of huge past losses, and against the high levels of projected future losses of these resources as a result of many other projects in the study area. These projected losses would detract from the USFWS recovery plan for vernal pool species that specifies at least 85 percent of the core vernal pool habitat within western Placer County should be preserved to meet recovery goals.

#### **INFORMAL ELEVATION MEETING #20 – October 15, 2008**

Meeting participants included mid-level managers and staff from USCOE, U.S. EPA, FHWA, Caltrans, PCTPA, Placer County, Koegel and Associates, and URS Corporation. Meeting observers included representatives from the City of Roseville and Congressman Doolittle’s office.

The meeting objective was to resolve two issues related to natural resource agencies' non-concurrence with Concurrence Point 4, Identification of the Corridor Most Likely to Contain the LEDPA. These issues are the effect of two alternatives' growth-inducing potential and their effect on habitat fragmentation. Agenda items included:

- Introductions
- Meeting Expectations
- Background
- Growth Inducement
- Habitat Fragmentation
- Concurrence – Corridor Most Likely to Contain the LEDPA
- Next Steps

A briefing paper outlining issues was jointly prepared by the parties prior to the meeting. SPRTA and FHWA staff summarized the proposed project, the modified NEPA/404 process, and the two LEDPA dispute issues—growth and habitat fragmentation. The USCOE/U.S. EPA managers supported their staffs' positions.

The USCOE/U.S. EPA offered two conceptual ideas for consideration. The first was to carry both Alternatives 1 and 5 into the Tier 2 EIS/EIR. This suggestion was initially rejected by the transportation agencies because of excessive expenditure of public funds.

The second idea was that USCOE/U.S. EPA would recognize Alternative 5 as the LEDPA—if land could be protected, which would preclude potential induced growth. Areas at risk of development were generally identified—north/south of Alternative 5. This land would not be considered compensatory mitigation. The land would include a “buffer” to account for any uncertainties. No guidance was offered as to how to calculate the appropriate amount of land. The transportation agencies agreed to consider this idea and to provide feedback.

**Note:** On October 30, FHWA, for the transportation agencies, formally rejected both of the conceptual ideas proposed by the USCOE/U.S. EPA. The first one—forwarding the two alternatives into the Tier 2 process—was rejected because:

- The purpose of this Tier 1 work is to identify one corridor so it can be preserved for future roadway construction.
- It is not a prudent expenditure of public funds to evaluate alternatives within two corridors.

The land set-aside idea for projected induced growth was rejected because:

- The data and analysis developed in the Tier 1 EIS/EIR and the LEDPA Concurrence Request support Alternative 5 as the corridor most likely to contain the LEDPA.
- There is no substantial difference in projected induced growth between Alternatives 1 and 5.

FHWA, for the transportation agencies, requested a Formal (Senior-level Managers Elevation) Meeting to resolve the LEDPA concurrence dispute.

## **COORDINATION MEETING #21 – December 16, 2008**

[In October, the SPRTA Board directed the staff to share the LEDPA dilemma with SACOG and to see if they could provide assistance. Based on this, a SACOG consultant set up meetings locally in October and November 2008 with Chip Smith, Assistant for Environmental, Tribal and Regulatory Affairs, Office of the Assistant Secretary of the Army. Mr. Smith subsequently scheduled this Washington, D.C. meeting.]

Meeting participants included Washington, D.C.–based headquarters staff from USCOE, U.S. EPA, and FHWA along with local staff via telephone (USCOE – Sacramento District, U.S. EPA Region IX, USFWS – Sacramento Office). The SPRTA Board Chair and a board member alternate attended along with SACOG and SPRTA staff. FHWA, Caltrans, Placer County, and URS staff also attended via telephone.

The meeting objective was to share information with USCOE regulatory agency counterparts on SACOG’s regional efforts to effectively address growth and transportation, the Parkway project, its environmental documentation, and the LEDPA concurrence stalemate.

In opening comments, Mr. Smith stressed that the Parkway was one of many infrastructure projects to come and it was important for both field- and HQ-based staffs to understand project issues for future permitting. For background, the SPRTA staff summarized the SACOG Blueprint, the Placer Parkway project, and extensive environmental process undertaken to date. Details were also provided on the modified NEPA/404 process and the LEDPA concurrence dispute issue. Specific questions were answered on project impacts including data, analyses methods/results, and conclusions, as well as ones on vicinity planned/proposed development.

Each agency made concluding remarks.

- USCOE
  - encouraged the continuation of the dispute resolution process,
  - appreciated getting Parkway/LEDPA issues out for D.C. peers,
  - promoted Placer County Conservation Plan (PCCP) progress,
  - indicated the Parkway was not to be a "road to nowhere"— rather it is synchronized with SACOG regional activities, and
  - concluded that the regulatory agencies should view the project via the agreed upon Purpose/Need.
- U.S. EPA concluded that the information was helpful; but would require more meetings to be better informed. They were hopeful that the LEDPA concurrence issue could be resolved at the local level as the local staff was more knowledgeable than HQ staff.
- USFWS concurred that purpose and need should be folded back into the conclusions. It was emphasized that it would be difficult to make a decision on the Parkway without the proposed PCCP. More meetings would be required.

## **FORMAL ELEVATION MEETING #22 – January 23, 2009**

Meeting participants<sup>1</sup> included senior-level managers and staff from USCOE, U.S. EPA, USFWS, FHWA, Caltrans, Placer County, PCTPA, and URS Corporation.

The meeting objective was to resolve two issues related to natural resource agencies' non-concurrence that Alternative 5 was the corridor most likely to contain the LEDPA. The issues were the effects of Alternatives 1 and 5's growth-inducing potential and their effect on habitat fragmentation. Agenda topics included:

- Introductions
- Meeting Expectations
- Project Background/LEDPA Summaries
- Discussion
- Concurrence – Corridor Most Likely to Contain the LEDPA

SPRTA staff provided a brief, with a handout, which summarized the project, the modified NEPA/404 process, and LEDPA dispute issues (growth inducement and habitat fragmentation related to growth). A Project Purpose clarification was also outlined, which was based on December 16, 2008 Washington, D.C. meeting guidance.

SPRTA staff concluded that the data and analyses contained in the Draft Tier 1 EIS/EIR and the additional analyses completed for the LEDPA concurrence request documented that Alternative 5 would be the corridor most likely to contain the LEDPA. Specific points included:

- The project vicinity and surrounding area are targeted for growth via SACOG's Blueprint and by city/county general plans—with or without the Placer Parkway.
- Alternative 5's direct impacts would be less than those for Alternative 1.
- Alternative 5's secondary/indirect impacts—related to growth inducement would be less than Alternative 1's based on extensive qualitative and quantitative analyses.
- The regulatory agencies concern with the floodplain constraint—related to potentially developable land—is not realistic.

U.S. EPA staff generally concurred with the SPRTA background and the two dispute issues. However, they reiterated that their analysis (floodplains should not be a development constraint) showed that Alternative 1 would contain the LEDPA. SPRTA staff observed this conclusion was based on the most speculative of all of the analyses. It used additional hypothetical interchanges and reduced/eliminated the “no-development” buffer. These hypothetical components are not a part of the Project Description.

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<sup>1</sup> Meeting participants consisted of the following principals along with support staffs:

- FHWA – California Division – Acting Chief
- Caltrans – District 3, Chief – Environmental Services
- SPRTA – SPRTA Board Chairman
- USCOE – Sacramento District – Regulatory Chief
- U.S. EPA – Community and Ecosystems Division Director and Water Division Director
- USFWS – Assistant Field Supervisor – Endangered Species

The meeting did not resolve the concurrence dispute. However, it was agreed to suspend the dispute resolution process in order to explore developing a “framework or approach” to link conservation measures to the indirect impacts related to the Parkway’s potential growth inducement. The meeting’s objective would not be to identify specific parcels for conservation. Rather, it would be to develop a conservation framework to be implemented in the Tier 2 stage.

### **COORDINATION MEETING #23 – April 17, 2009**

Meeting participants included staff from USCOE, U.S. EPA, USFWS, FHWA, Caltrans, Placer County, PCTPA, Mara Feeney and Associates, and URS Corporation.

The meeting objective was to resolve the LEDPA concurrence dispute, based on direction from the Formal (Senior-level managers) Elevation Meeting (January 23, 2009) to explore the feasibility of developing a “framework or approach” to link conservation measures to the indirect impacts related to the Parkway’s potential growth inducement. This framework would be implemented in the later Tier 2 process. Agenda topics included:

- Introductions
- Conservation Framework Development
- Other Items
- Next Steps

Two options were offered by the regulatory agencies for consideration. As presented, they would avoid growth inducing impacts to aquatic resources and would result in Alternative 5 as the LEDPA. Both options would:

- Develop a conservation easement or other appropriate tool (for Tier 2 implementation) to eliminate access to the future Parkway in its Western/Central segments, and
- Amend the Placer County General Plan—so that Alternative 5 would become an “urban limit line”—no urban development to the north.

Option 2 dropped the provision for a “conservation easement” north of the Parkway, and included a third provision, which would:

- Estimate aquatic resources between Alternatives 5 and 1 in the Western/Central segments and conserve them via ratios in the proposed PCCP conceptual conservation strategy.

An amended project description, using one of these options, would be the basis of a re-submitted LEDPA concurrence request. The regulatory agencies would concur. Work could then start on the last modified NEPA/404 concurrence point—Mitigation Framework.

Discussion focused on the regulatory agencies’ objective to eliminate any future Parkway access in a portion of the Western/Central segments. To do this, they proposed a one-mile-wide conservation easement or other appropriate tool. The transportation agencies pointed out this access restriction could be achieved using a much shorter distance. The transportation agencies agreed to work with legal counsel on the suitable tool that would be permanently restrict access to the Parkway.

## **COORDINATION MEETING #24 – May 29, 2009**

Meeting participants included staff from USCOE, U.S. EPA, USFWS, FHWA, Caltrans, Placer County, PCTPA, and URS Corporation.

The meeting's objective was to continue April 17 work on the feasibility of developing a framework or approach for concurrence identifying Alternative 5 as the corridor alignment most likely to contain the LEDPA. The specific objective of this meeting was to obtain resource agencies' feedback on a May 11, 2009 memo prepared by the transportation agencies. Agenda topics were:

- Introductions
- Re-cap—Conservation Framework Development
- Memo Feedback
- Next Steps

The May 11 memo outlined the transportation agencies' three-point approach to address the access issue and Option 1 presented by the resource agencies at the last meeting. This memo cited that it would not be possible to absolutely prohibit future changes in use (i.e., Parkway access) under every possible circumstance. However, a combination of land use constraints noted below would provide the greatest assurance by making condemnation more difficult and costly:

- General plan designations/zoning districts to limit uses in the area to agriculture, open space, resource conservation, and others that would not allow transportation infrastructure.
- Keeping the buffer area in mostly private ownership.
- Acquiring conservation easements to be transferred to third parties for oversight/management.

At the meeting, U.S. EPA indicated the memo was generally in the right direction; however, more detail would be required. They agreed to eliminate the area identified for a potential Watt Avenue interchange from the easement-restricted area. While USCOE staff did not attend, U.S. EPA stated that the USCOE is in agreement with this position.

It was agreed that the general plan designations/zoning actions could be changed by subsequent County actions, and it was not necessary to include this concept.

The transportation agencies agreed to provide more specifics on the easement (description and figure). Once resource agencies' responses are complete, the transportation agencies are to re-submit a LEDPA concurrence request.

## **COORDINATION MEETING #25 – August 5, 2009**

Meeting participants included staff from USCOE, U.S. EPA, USFWS, FHWA, Caltrans, Placer County, PCTPA, and URS Corporation.

The meeting's objective was to reach consensus on the framework, which will allow (1) Alternative 5 to be identified as the corridor most likely to contain the LEDPA, (2) to get input on the draft LEDPA concurrence request letter, and (3) to determine what is an appropriate

Mitigation Framework (Concurrence Point 5) for this Tier 1 corridor preservation project. Agenda topics were:

- Introductions
- Final May 29, 2009 Meeting Minutes
- Consultation Process Status
- LEDPA Concurrence Request and Required Content
- Mitigation Framework—Concurrence Point 5
- Other Items
- Action Items

The July 31, 2009 Transportation Agencies Conservation Easement (CE) Responses to July 2009 Resource Agencies' Feedback document was used as the discussion document for this agenda item (copy attached).

Item 1: Future documentation for LEDPA concurrence request and FEIS's Preferred Alternative – It was agreed that the transportation agencies' response was ok.

*Item 2: Conservation Easement Holder – “City/County” Concern* – USFWS is concerned that the Endangered Species Act (ESA) compliance easement needs to be accredited by the Land Trust alliance, approved by the California Department of Fish and Game, or approved by the California Council of Land Trusts. Jana Milliken stated that it was inappropriate for the easement to be held by a city or county. She noted, however, that USFWS is not a concurring party to the modified NEPA/404 process. Loren Clark responded that Placer County holds lots of ESA easements, and that the PCCP is structured for them to take even more responsibility. Gary Sweeten and Chris Collison noted that the primary purpose of the conservation easement for Placer Parkway was not for purposes of ESA compliance, it was conservation of open space, agriculture, and related uses for purposes of preventing access to the Parkway.

USCOE and U.S. EPA are concerned that they have input on and concur with the eventual easement holder. The transportation agencies are concerned that the Tier 2 process not be held up or not be able to be completed if the NEPA/404 agencies do not find any potential jurisdictional easement holders acceptable. The following language, to replace bullet number 5 in the “Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway,” was accepted by all parties:

If the easement will not be accepted by such non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be to convey it to a federal agency or to a state government entity such as the California Department of Fish and Game. Failing that, the NEPA/404 agencies will work together through the NEPA/404 process to identify and to concur on an acceptable conservation easement holder.

*Item 3: Airspace rights (vertical rights)* – Dave Smith (U.S. EPA) said that it was a fundamental principle that the easement holder would have an obligation to enforce the buffer. After discussion, the language in the last two bullets in the “Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway” was reviewed. This language appeared to resolve the concerns of USCOE, U.S. EPA, and USFWS. Nancy Haley (USCOE) will review with USCOE counsel, and if she is okay with this language, all parties agreed that no changes were needed.

*Item 4: Minimum Buffers* – It was agreed that the transportation agencies' response was ok. It was clarified that the 25-foot buffer was for the purpose of restricting access; there could be other buffer requirements related to distance from adjacent resources( e.g., streams that could require a larger buffer), depending on design.



The LEDPA concurrence request package would consist of the following:

- Cover letter, referencing June 8, 2009 request for concurrence letter, with revisions as described in Chapter 4 of the Final EIS, and referencing the four items discussed at this meeting
- Summary of agreed information being made part of the project description in the Final EIS
- June 12, 2009 “Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway”
- July 7, 2009 memo from Stan Tidman – Transportation Agencies’ Response to Erin Foresman feedback (emailed on July 8)
- July 31, 2009 Transportation Agencies CE Responses to July 2009 Resource Agencies’ Feedback
- These meeting minutes [**Note:** reference is to complete minutes, not this summary]

Concurrence Point 5 – the Mitigation Framework – was discussed. All parties agreed that the mitigation framework should be general at this Tier 1 stage. The Mitigation Framework will include the following:

- Summary of mitigation considerations and mitigation commitments to follow in Tier 2, from the Tier 1 EIS/EIR as appropriate (biology, water quality, hydrology)
- Acknowledgment that preferred compensation would be through the Placer County Habitat Conservation Plan/Natural Communities Conservation Plan, if available
- Acknowledgement of the Compensatory Mitigation for Losses of Aquatic Resource; Final Rule (40 Code of Federal Regulations, Part 230, April 10, 2008) and its hierarchy of preferred compensation:
  - Mitigation banks
  - In-lieu fees
  - Permittee-responsible
- General discussion of mitigation opportunities, if the PCCP were not available, including opportunities to build on existing conservation
- Intent to work with the resource agencies to identify appropriate mitigation
- Reiteration that the no-access buffer is not intended as part of compensatory mitigation

USFWS noted that they prefer permittee-responsible compensation before in-lieu fees; Gary Sweeten said that FHWA did, also.

It was agreed that a draft of this framework could be prepared quickly for review by the resource agencies, and that it could be included in a combined request for concurrence along with Concurrence Point 4.

## Background

The transportation agencies believe that we are close to finalizing agreement on the Conservation Framework; which will lead to concurrence that Alternative #5 is the corridor most likely to contain the LEDPA. This is the transportation agencies latest response to July 2009 feedback received from the resources agencies on terms of the conservation easement (CE) proposed for the Conservation Framework. We offer this feedback as a basis for discussion at our August 5, 2009 meeting, and completion of the LEDPA concurrence point.

Relevant background documents include the following:

- April 17, 2009 Conservation Framework Meeting #1 -- Placer Parkway Alternative 5 LEDPA Options that avoid growth inducing impacts to ESA and CWA resources, provided by resources agencies.
- May 11, 2009 email from Stan Tidman -- Conservation Framework Meeting Follow-up.
- May 29, 2009 Conservation Framework Meeting #2 – Final Meeting Notes.
- June 12, 2009 email from Denise Heick (on behalf of the transportation agencies) -- Terms of a No-Access Easement for the Buffer Area Adjacent to Placer Parkway for resources agencies' review (bullet list and pdf of map).
- June 26, 2009 email from Erin Foresman, USEPA -- responding to Terms of No-Access Easement
- July 7, 2009 memo from Stan Tidman -- Transportation agencies' Response to Erin Foresman feedback (emailed July 8, 2009).
- July 14, 2009 email from Nancy Haley, USACE – feedback
- July 15, 2009 email from Michelle Tovar, USFWS – feedback
- July 21, 2009 email from Carolyn Mulvihill, USEPA -- feedback

**1. Future documentation for LEDPA concurrence request and FEIS's Preferred Alternative.**

- Corps (Nancy Haley – 7.14.2009 email)  
No issue identified.
- USFWS – (Michelle Tovar -- 7.15.2009)  
No issue identified.
- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
**EPA requests that in future documentation, such as the request for concurrence on the corridor most likely to contain the LEDPA and the FEIS, the preferred alternative be described as “Modified Alternative 5” or another description which clarifies that the alternative is different from the Alternative 5 discussed in previous documents.**

Transportation agencies' response:

*Please note that the Draft Tier 1 EIS/EIR's No-Development Buffer Concept (Section 2.2.4) describes the no-development buffer zone and its intent to accomplish: 1) furthering a “parkway” concept and 2) limiting access to the Parkway. the Draft EIS/EIR then outlines a number of general mechanisms to limit new interchanges by controlling buffer development. We believe that the conservation framework is entirely consistent with the description of the project in the Draft EIS/EIR, and helps to refine the general outline of implementing mechanisms by describing a specific approach for a specific part of Alternative 5. If we make the desired USEPA distinction, we run the risk of confusing the public by creating the impression that a new alternative has been identified.*

*Although we think a new name for the alternative is inappropriate, we think the conservation framework must be included as part of the project if the project is approved. The framework will be reflected in the Final EIS/EIR description of Alternative 5, and will also be part of any project approval actions. As indicated in the July 7 memo (Item 1 – pages 2-3), the Preferred Alternative (in the FEIS) and the LEDPA concurrence request will include language on the conservation framework that forms the basis of Concurrence Point #4. If the SPRTA Board adopts Alternative #5, the conservation framework description will be included in the resolution of adoption. If FHWA selects it, this language will also be included in the ROD.*

*We believe our solution addresses the USEPA issue and is consistent with the intent of the conservation framework.*

## **2. Conservation Easement (CE) Holder – ‘City/County’ Concern**

- Corps (Nancy Haley – 7.14.2009 email)  
Shares USEPA concern with terms. Suggests following revision:

**“If the easement will not be accepted by such non-profit organization, or if the organization is no longer able to hold the easement, the first priority shall be made to convey it to a federal agency or to a state governmental entity such as the California Department of Fish and Game. Failing that, with prior concurrence from the NEPA/404 MOU agencies, it may be held by any city, county, city and county, district, or other local governmental entity, if otherwise authorized to acquire and hold title to real property.”**

- USFWS – (Michelle Tovar -- 7.15.2009)

The language, among other things, would need to convey the purpose of the easement (for conservation). Also the sole purpose of the easement holder should be to hold easements. I doubt if any city, county, or state would agree to that. They must meet one or more of the following criteria: (1) accredited by the Land Trust alliance (<http://www.landtrustalliance.org/home-page>); (2) approved by CDFG; or (3) approved by the California Council of Land Trusts (<http://www.calandtrusts.org/>).

While we understand they can't guarantee at this point that they will find an NGO that would be willing and qualified to hold the CE on this, or that CDFG would hold it, it is inappropriate to suggest that a governmental entity would be acceptable alternative – this bullet point should be removed.

- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
EPA will accept the modified language as suggested by the transportation agencies in the attached document, with the addition of the following language,

**“If the transportation agencies are unable to find a non-profit conservation organization to hold the easement or have CDFG hold the easement, the agencies will work with EPA, Corps, and USFWS to ensure that an appropriate and capable organization is identified.”**

### Transportation agencies response:

*First, as we have expressed before, locking ourselves into too much detail at Tier 1 is not consistent with the January 23, 2009 meeting direction to pursue a conservation framework (or general approach). Trying to limit potential CE holders at Tier 1 may preclude options at Tier 2. We believe there will be ample opportunity to work out conservation framework details, including what entity holds the CE, during the Tier 2 process. Selecting, or eliminating, possible CE holders is premature at the framework stage.*

*We understand that the resources agencies have a concern with a local jurisdiction being a CE holder. . Although no reason for this is stated in the resource agency comments, it appears that the agencies are concerned that local jurisdictions would fail to enforce an easement, notwithstanding the fact that the restriction on access was proposed by the local jurisdictions and that all of the modified NEPA/404 MOU agencies and local jurisdictions agree that we want to limit the potential for new interchanges.*

*Although we do not agree that local governments should be excluded as potential CE holders, nor do we urge that they take that role. As expressed in the July 8 email, it is clearly our intent, in the Tier 2 process, to identify a non-profit organization as the CE holder. Only if that is not feasible would we seek another CE holder, and then the first priority would be to convey the CE to a federal agency or to a state entity, with local jurisdictions CE holders of last resort (see July 7 memo – Item 2 – pages 2-3.) Closing off the potential now for a local jurisdiction to be a potential CE holder raises the concern about what happens if there is no one else to hold it. We do not want the easement provision to fail for lack of an entity willing to hold the easement. We believe preserving (vs. eliminating) potential CE holders at Tier 1 is consistent with the intent of the conservation framework.*

*We believe our July 7 memo addresses the resources agencies' concern and is consistent with the intent of the conservation framework.*

### 3. Airspace rights (vertical rights).

- Corps (Nancy Haley – 7.14.2009 email)  
Easement suggested language: “The covenant not to allow access will include a specific prohibition regarding interchange structures in the airspace over the property.”

This needs to be extremely clear prior to the end of Tier 1. I would like to know what that “specific prohibition” language is.

- USFWS – (Michelle Tovar -- 7.15.2009)  
The language, among other things, would need to convey the purpose of the easement (for conservation)....And, we also need to review specific language on the airspace prohibition. So bottom line: In the absence of easement language itself, we can not “approve” or “concur” on this list of terms. Although not required to concur, we will make our concerns known now.
- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
It is the understanding of the resource agencies that specific language would be provided as part of the framework. The transportation agencies explained in two previous meetings that conservation easements could be of minimal width because the rights that the easements purchase extend vertically into the air above the ground specified in the easement. The natural resource regulatory agencies responded that we are unfamiliar with these “vertical rights” and would like our solicitors to review that legal language before we feel comfortable that easements of a minimal width, such as 25 feet, could prevent construction of additional access, in the form of aerial structures. With respect to the suggested language, it is clear that the Grantee has the right to prevent activities inconsistent with the purpose of the easement but it is not clear in the language suggested that the Grantee has a responsibility to prohibit activities contrary to the purpose of the easement. We would like the language regarding vertical rights, if such language exists, provided before any request for concurrence on the corridor most likely to contain the LEDPA so that our legal staff can review it.

#### Transportation agencies response:

*Again, we are concerned that debating specific language in a conservation easement is inconsistent with the intent of the January 23, 2009 meeting direction to pursue a conservation framework. Even so, in response to resource agency comments we did provide draft language which specifically addresses the issue of construction in the airspace of the land covered by the easement. Language on this issue was provided in the July 7 memo (Item 3 – page 3). It included – “The following language, or substantially similar language, is intended:*

***Grantee has the right to prevent any activity on or use the Property that is inconsistent with the Purpose of this Conservation Easement, including but not limited to the construction of any structures under, over, around or through the Property intended to provide access to the adjacent highway known as Placer Parkway, including but not limited to interchanges.”***

*We believe the suggested language addresses the resources agencies' issue and is consistent with the intent of the conservation framework.*



**4. Minimum buffers.**

- Corps (Nancy Haley – 7.14.2009 email)  
No issue identified.
- USFWS – (Michelle Tovar -- 7.15.2009)  
No issue identified.
- USEPA (Carolyn Mulvihill -- 7.21.2009 email)  
**Our concern about minimum buffers on either side of the roadway is related to the issue of preventing aerial structures that might connect to the roadway from beyond the buffer. If we were given a level of certainty, through the inclusion of specific easement language, as discussed above, the specific buffer widths would not be a significant issue for EPA. The Corps of Engineers generally requires a 50' buffer for onsite preserves that avoid aquatic resources associated with CWA Section 404 permits.**

*Transportation agencies response: The suggested language in Item 3 (above) addresses the resources agencies' airspace/interchange issue. So, the width (outside of the corridor) should not be a big concern. The 25-foot-wide buffer (outlined in the July 8 email and attachment – Item 4 – page 3) was deemed adequate because it would ensure an adequate area for access and maintenance.*

*We believe the 25-foot width addresses the resources agencies' issue and is consistent with the intent of the conservation framework.*

**APPENDIX B**  
**PUBLIC INVOLVEMENT NOTICES AND MATERIALS**



**APPENDIX B  
PUBLIC INVOLVEMENT NOTICES AND MATERIALS**

<b>Appendix B1</b>	<b>Notice of Availability of Placer Parkway Draft Tier 1 EIS/EIR, June 2007</b>
<b>Appendix B2</b>	<b>Notice of Availability of Partially Revised Draft Tier 1 EIS/EIR, January 2009</b>
<b>Appendix B3</b>	<b>Notice of Availability of Partially Revised Draft Tier 1 EIS/EIR (extension of comment period) – March 2009</b>
<b>Appendix B4</b>	<b>Newsletter – February 2007</b>
<b>Appendix B5</b>	<b>Newsletter – July 2007</b>
<b>Appendix B6</b>	<b>Newsletter – January 2009</b>
<b>Appendix B7</b>	<b>Newsletter – November 2009</b>
<b>Appendix B8</b>	<b>PowerPoint Presentation – August 2007 Public Hearings</b>
<b>Appendix B9</b>	<b>Transcript of August 6, 2007 Public Hearing</b>
<b>Appendix B10</b>	<b>Transcript of August 8, 2007 Public Hearing</b>
<b>Appendix B11</b>	<b>PowerPoint Presentation – February 2009 Public Hearings</b>
<b>Appendix B12</b>	<b>Transcript of February 23, 2009 Public Hearing</b>
<b>Appendix B13</b>	<b>Transcript of February 25, 2009 Public Hearing</b>
<b>Appendix B14</b>	<b>PCTPA Website Information</b>



**Appendix B1**  
**Notice of Availability of Placer Parkway Draft Tier 1 EIS/EIR**  
**June 2007**



**NOTICE OF AVAILABILITY FOR PUBLIC REVIEW  
DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT/PROGRAM  
ENVIRONMENTAL IMPACT REPORT**

**Federal Highways Administration (FHWA), California Department of Transportation (Caltrans), and South Placer Regional Transportation Authority (SPRTA) have released a Draft Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR) for the Placer Parkway Corridor Preservation Project**

**Proposed Action/Project:** Placer Parkway Corridor Preservation Project (FHWA Report Number: FHWA-CA-DEIS 2007-46 and State Clearinghouse Number: 2003092069)

**Project Description:** FHWA, Caltrans, and SPRTA propose to select and preserve a corridor for the future construction of Placer Parkway, a new east-west roadway linking State Route (SR) 70/99 in Sutter County east to SR 65 in Placer County (see Figure 1). Specifically, the action being considered and evaluated is to select and preserve a 500- to 1,000-foot-wide corridor in the project study area, within which the future four- or six-lane Placer Parkway may be constructed. Placer Parkway is intended to reduce anticipated congestion on both the local and regional transportation system and to advance economic development goals in south Sutter County and southwestern Placer County.

Five build alternatives and a no-build alternative are evaluated in the Tier 1 EIS/EIR (see Figure 2). Although the Parkway would be designed and construction-level impacts analyzed during Tier 2, for the purpose of the Tier 1 EIS/EIR, several assumptions have been made about potential design and configuration concepts. These assumptions would be subject to further development and refinement, and specific decisions about design of the roadway would be made during the Tier 2 process. The Parkway would be a high-speed, limited access roadway. Conceptually, interchanges would be located at SR 70/99 (at one-half mile north of Riego Road or at Sankey Road), one or two locations to be determined in southern Sutter County, Fiddymont Road, Foothills Boulevard, and SR 65 at Whitney Ranch Parkway. Access would be restricted for the 7-mile segment between Pleasant Grove Road and Fiddymont Road. The Tier 1 EIS/EIR assumes no interchanges in this segment.

The Parkway may be designed and constructed incrementally in segments. These could be built as a four-lane (interim) roadway until a six-lane segment is warranted, or as the full six-lane facility. The roadway would include a center median approximately 100 to 134 feet wide, depending on local conditions and reflecting Caltrans safety guidance. For the purposes of the Tier 1 EIS/EIR, the Parkway's opening year is assumed to be 2020.

**Project Location:** South Sutter County and Southwestern Placer County, California.

**Tier 1 Concept:** The planning for Placer Parkway involves two phases: (1) the present action, selection of a corridor (titled the Placer Parkway Corridor Preservation Project), and (2) the future selection of a precise alignment within the corridor and a decision whether or not to build the Parkway. If a build alternative is selected and pursued after the second phase, the ultimate Placer Parkway project would be constructed and operated.

Each phase will be subject to its own environmental review, a process known as "tiered" environmental review under both state and federal law. The selection of a corridor is the subject of this Tier 1 EIS/EIR. To the degree feasible this Tier 1 EIS/EIR reviews the reasonably foreseeable environmental effects of the construction and operation of the Parkway. Selection of a more precise alignment within the corridor, and construction and operation of the Parkway, will be the subject of a later, Tier 2 environmental document.



**Significant Environmental Effects:** The Tier 1 EIS/EIR identifies significant and unavoidable effects related to land use (specifically land use conversion, compatibility with proposed land uses, and consistency with applicable General Plan policies), farmland (specifically farmland and Williamson Act conversion, and conflicts with agricultural plans or policies), visual and cultural resources, traffic and transportation related to the addition of traffic on SR 70/99 (between I-5 and Elkhorn Boulevard), and on SR 65 (between I-80 and the SR 65 Lincoln Bypass), air quality, noise, biological resources (specifically to special-status species and their habitat), and growth inducement. The Tier 1 EIS/EIR also identifies cumulative impacts related to farmland and Williamson Act conversion, visual resources and cultural resources, traffic and transportation in some locations, air quality, noise, hydrology and water quality, and biological resources.

**Public Review and Comment Period:** Comments regarding the Draft Tier 1 EIS/EIR shall be accepted beginning on July 2, 2007 **and must be submitted in writing by 5:00 p.m. on August 20, 2007**, to Placer County Transportation Planning Agency (PCTPA) via regular mail to PCTPA, Attention: Celia McAdam, Executive Director, 299 Nevada St., Auburn, California 95603, or via email to [pctpa@pctpa.org](mailto:pctpa@pctpa.org).

**Scheduled Public Hearings:** The public, as well as agencies and local jurisdictions, are invited to comment on the Draft Tier 1 EIS/EIR at either of two public hearings:

- **August 6, 2007 – 7:00 pm** at the Veterans Memorial Community Building, 1425 Veterans Memorial Circle in Yuba City, California
- **August 8, 2007 – 7:00 pm** at the Roseville City Hall Council Chambers, 311 Vernon Street, in Roseville, California

**Availability of Tier 1 EIS/EIER for Public Review:** Copies are available for review at the following locations:

Placer County Transportation Planning Agency  
299 Nevada Street, Auburn, CA

Sutter County Planning Department  
1130 Civic Center Blvd., Yuba City, CA

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

Sacramento County Planning Department  
827 7th Street, Room 230, Sacramento, CA

Placer County Library  
350 Nevada Street, Auburn, CA

Roseville Public Library - Downtown  
225 Taylor Street, Roseville CA

Placer County Library, Loomis  
6050 Library Drive, Loomis, CA

Roseville Public Library - Maidu  
1530 Maidu Drive, Roseville CA

Sutter County Library, Main Branch  
7504 Forbes Avenue, Yuba City, CA

Rocklin Library  
5400 Fifth Street, Rocklin, CA

Sutter County Library, Pleasant Grove Branch  
3093 Howsley Road, Pleasant Grove, CA

Lincoln Library  
590 Fifth Street, Lincoln, CA

Sutter County Library, Browns Branch  
1248 Pacific Avenue, Rio Oso, CA

Sacramento County Library, North Natomas  
2500 New Market Drive, Sacramento, CA

Sacramento County Public Library  
828 I Street, Sacramento, CA

Sacramento County Library, North Highlands –  
Antelope  
4235 Antelope Road, Antelope, CA

California State University  
6000 J Street, Sacramento, CA

Sierra College Library  
5000 Rocklin Road, Rocklin, CA

Additional information, including documents referenced in the Draft Tier 1 EIS/EIR may be obtained by contacting Celia McAdam at the Placer County Transportation Planning Agency at 530.823.4030, Monday through Friday between the hours of 9:00 a.m. and 5:00 pm.

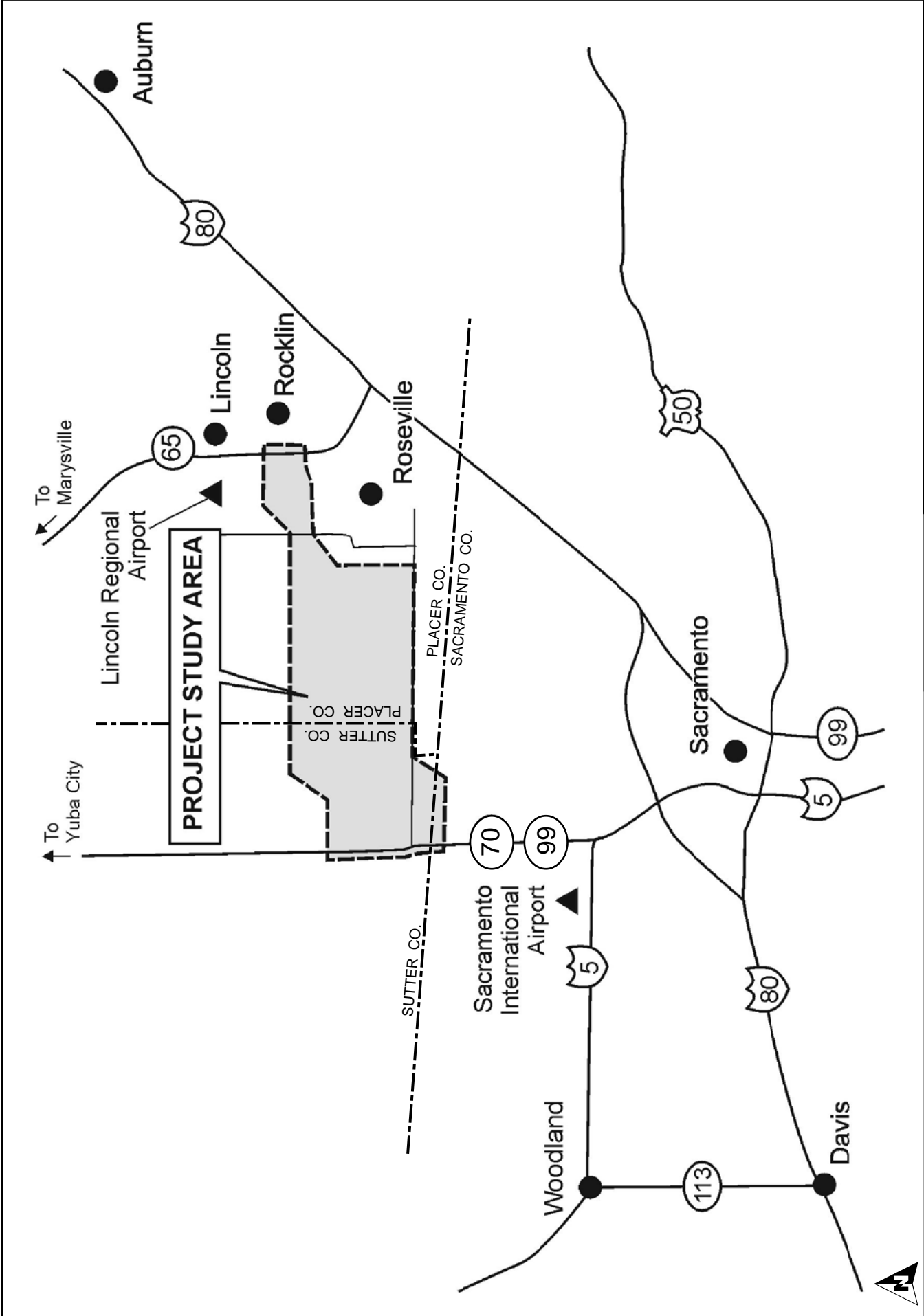
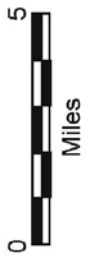


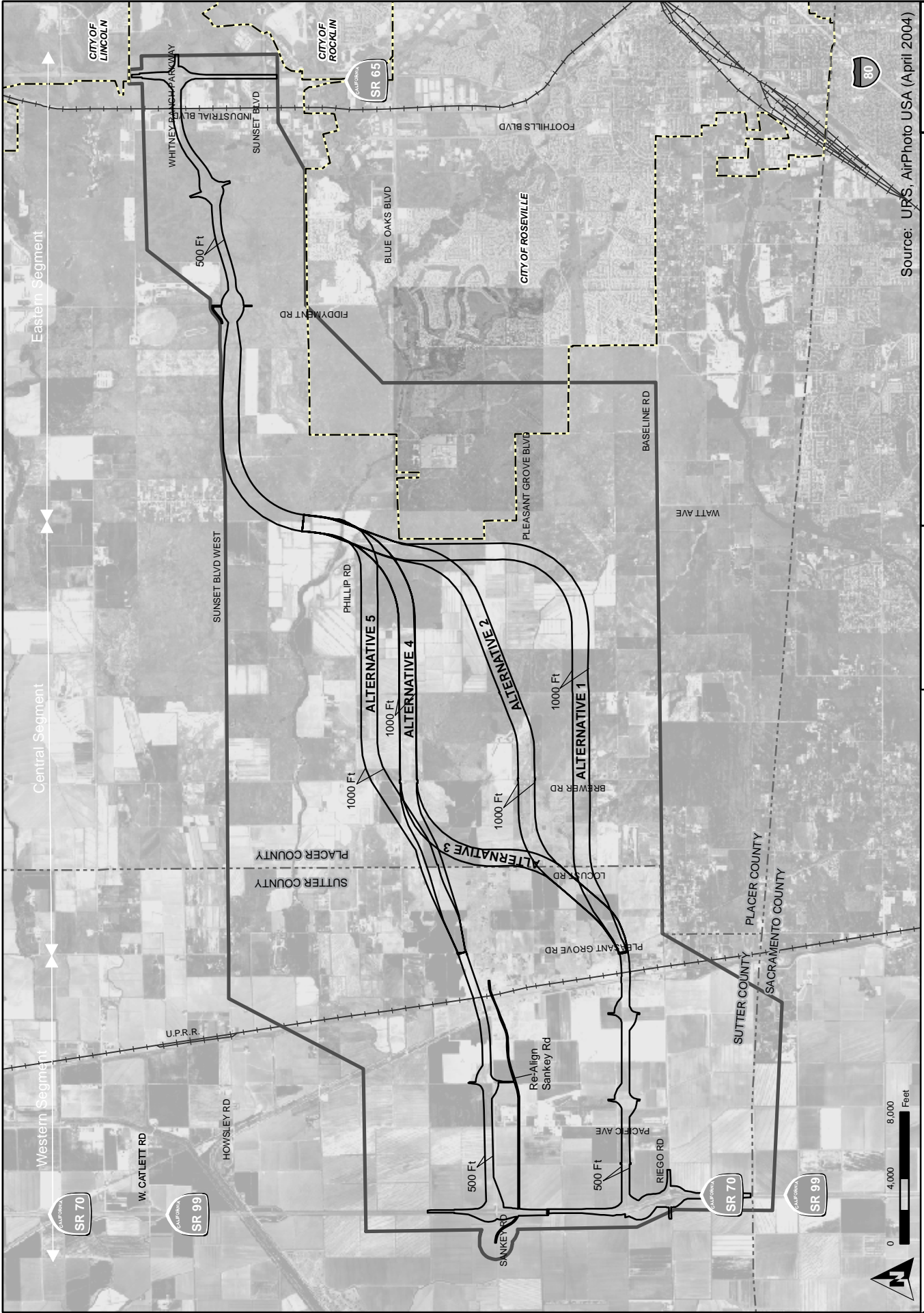
Figure 1

June 2007

Project Location Map

Tier 1 EIS/EIR





Source: URS, AirPhoto USA (April 2004)

Figure 2  
June 2007

# Project Alternatives

## Tier 1 EIS/EIR



- Alternatives
- County Boundary
- Study Area Boundary
- City Boundary

**Appendix B2**  
**Notice of Availability of Partially Revised Draft Tier 1 EIS/EIR**  
**January 2009**



**NOTICE OF AVAILABILITY FOR PUBLIC REVIEW  
PARTIALLY REVISED DRAFT TIER 1 ENVIRONMENTAL IMPACT  
STATEMENT/PROGRAM ENVIRONMENTAL IMPACT REPORT**

**Federal Highways Administration (FHWA), California Department of Transportation (Caltrans), and South Placer Regional Transportation Authority (SPRTA) have released a Partially Revised Draft Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR) for the Placer Parkway Corridor Preservation Project.**

**Proposed Action/Project:** Placer Parkway Corridor Preservation Project (FHWA Report Number: FHWA-CA-DEIS 2007-46 and State Clearinghouse Number: 2003092069).

**Project Description:** FHWA, Caltrans, and SPRTA propose to select and preserve a corridor for the future construction of Placer Parkway, a new east-west roadway linking State Route (SR) 70/99 in Sutter County east to SR 65 in Placer County (see Figure 1). Specifically, the action being considered and evaluated is to select and preserve a 500- to 1,000-foot-wide corridor in the project study area, within which the future four- or six-lane Placer Parkway may be constructed. Placer Parkway is intended to reduce anticipated congestion on both the local and regional transportation system and to advance economic development goals in south Sutter County and southwestern Placer County.

Five build alternatives and a no-build alternative are evaluated in the Tier 1 EIS/EIR (see Figure 2). Although the Parkway would be designed and construction-level impacts analyzed during Tier 2, for the purpose of the Tier 1 EIS/EIR, several assumptions have been made about potential design and configuration concepts. These assumptions would be subject to further development and refinement, and specific decisions about design of the roadway would be made during the Tier 2 process. The Parkway would be a high-speed, limited access roadway. Conceptually, interchanges would be located at SR 70/99 (at one-half mile north of Riego Road or at Sankey Road), one or two locations to be determined in southern Sutter County, Fiddymont Road, Foothills Boulevard, and SR 65 at Whitney Ranch Parkway. Access would be restricted for the 7-mile segment between Pleasant Grove Road and Fiddymont Road. The Tier 1 EIS/EIR assumes no interchanges in this segment.

The Parkway may be designed and constructed incrementally in segments. These could be built as a four-lane (interim) roadway until a six-lane segment is warranted, or as the full six-lane facility. The roadway would include a center median approximately 100 to 134 feet wide, depending on local conditions and reflecting Caltrans safety guidance. For the purposes of the Tier 1 EIS/EIR, the Parkway's opening year is assumed to be 2020.

**Project Location:** South Sutter County and Southwestern Placer County, California.

**Tier 1 Concept:** The planning for Placer Parkway involves two phases: (1) the present action, selection of a corridor (titled the Placer Parkway Corridor Preservation Project), and (2) the future selection of a precise alignment within the corridor and a decision whether or not to build the Parkway. If a build alternative is selected and pursued after the second phase, the ultimate Placer Parkway project would be constructed and operated.

Each phase will be subject to its own environmental review, a process known as "tiered" environmental review under both state and federal law. The selection of a corridor is the subject of the Tier 1 EIS/EIR. To the degree feasible the Tier 1 EIS/EIR reviews the reasonably foreseeable environmental effects of the construction and operation of the Parkway. Selection of a more precise alignment within the corridor, and construction and operation of the Parkway, will be the subject of a later, Tier 2 environmental document.

**Revisions to the Draft Tier 1 EIS/EIR and Additional Analyses in the Partially Revised Draft Tier 1 EIS/EIR:**

The Partially Revised Draft Tier 1 EIS/EIR serves as a supplement to the Draft Tier 1 EIS/EIR issued in June 2007, to reflect additional analyses developed since the publication of the prior draft. The Partially Revised Tier 1 EIS/EIR provides revisions to the Draft Tier 1 EIS/EIR, including updates to farmland classification data and greenhouse gas emissions. It also includes additional analyses of growth inducement, secondary and indirect impacts and cumulative impacts based on hypothetical future scenarios prepared for the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers.

**Public Review and Comment Period:** Comments regarding the Partially Revised Draft Tier 1 EIS/EIR shall be accepted beginning on January 30, 2009 **and must be submitted in writing by 5:00 p.m. on March 15, 2009** to Placer County Transportation Planning Agency (PCTPA) via regular mail to PCTPA, Attention: Celia McAdam, Executive Director, 299 Nevada St., Auburn, California 95603, or via email to [pctpa@pctpa.net](mailto:pctpa@pctpa.net).

**Scheduled Public Hearings:** The public, as well as agencies and local jurisdictions, are also invited to comment on the Partially Revised Draft Tier 1 EIS/EIR at either of two public hearings:

- **February 23, 2009 – 6:00 pm** at the Veterans Memorial Community Building, 1425 Veterans Memorial Circle in Yuba City, California 95993
- **February 25, 2009 – 10:45 am** at the Placer County Board of Supervisors Chambers (The Domes), 175 Fulweiler Avenue, Auburn, California 95603

**Availability of the Partially Revised Draft Tier 1 EIS/EIER for Public Review:** Copies are available for review at the following locations:

Placer County Transportation Planning Agency  
299 Nevada Street, Auburn, CA

Sutter County Planning Department  
1130 Civic Center Blvd., Yuba City, CA

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

Sacramento County Planning Department  
827 7th Street, Room 230, Sacramento, CA

Placer County Public Works Department  
3091 County Center Drive, Auburn, CA

Roseville Public Library - Downtown  
225 Taylor Street, Roseville CA

Placer County Library  
350 Nevada Street, Auburn, CA

Roseville Public Library - Maidu  
1530 Maidu Drive, Roseville CA

Placer County Library, Loomis  
6050 Library Drive, Loomis, CA

Rocklin Library  
5400 Fifth Street, Rocklin, CA

Sutter County Library, Main Branch  
7504 Forbes Avenue, Yuba City, CA

Lincoln Library  
590 Fifth Street, Lincoln, CA

Sutter County Library, Pleasant Grove Branch  
3093 Howsley Road, Pleasant Grove, CA

Sierra College Library  
5000 Rocklin Road, Rocklin, CA

Sutter County Library, Browns Branch  
1248 Pacific Avenue, Rio Oso, CA

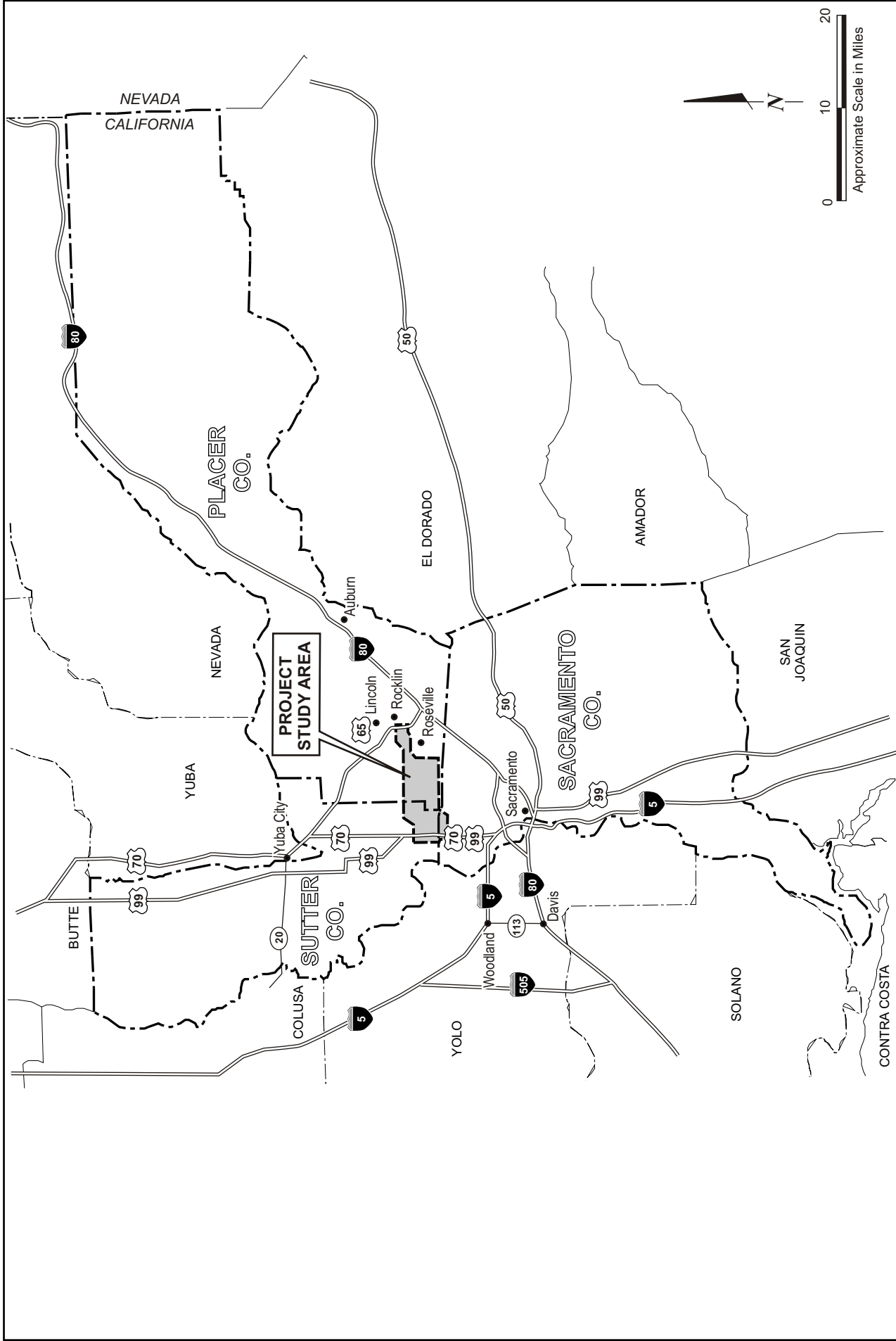
Sacramento County Library, North Natomas  
2500 New Market Drive, Sacramento, CA

Sacramento County Public Library  
828 I Street, Sacramento, CA

Sacramento County Library, North Highlands – Antelope  
4235 Antelope Road, Antelope, CA

California State University  
6000 J Street, Sacramento, CA

Copies can also be obtained electronically from PCTPA's project website at [www.pctpa.net](http://www.pctpa.net). Additional information, including documents referenced in the Partially Revised Draft Tier 1 EIS/EIR, may be obtained by contacting Celia McAdam at the Placer County Transportation Planning Agency at 530-823-4030, Monday through Friday between the hours of 9:00 a.m. and 5:00 pm.



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

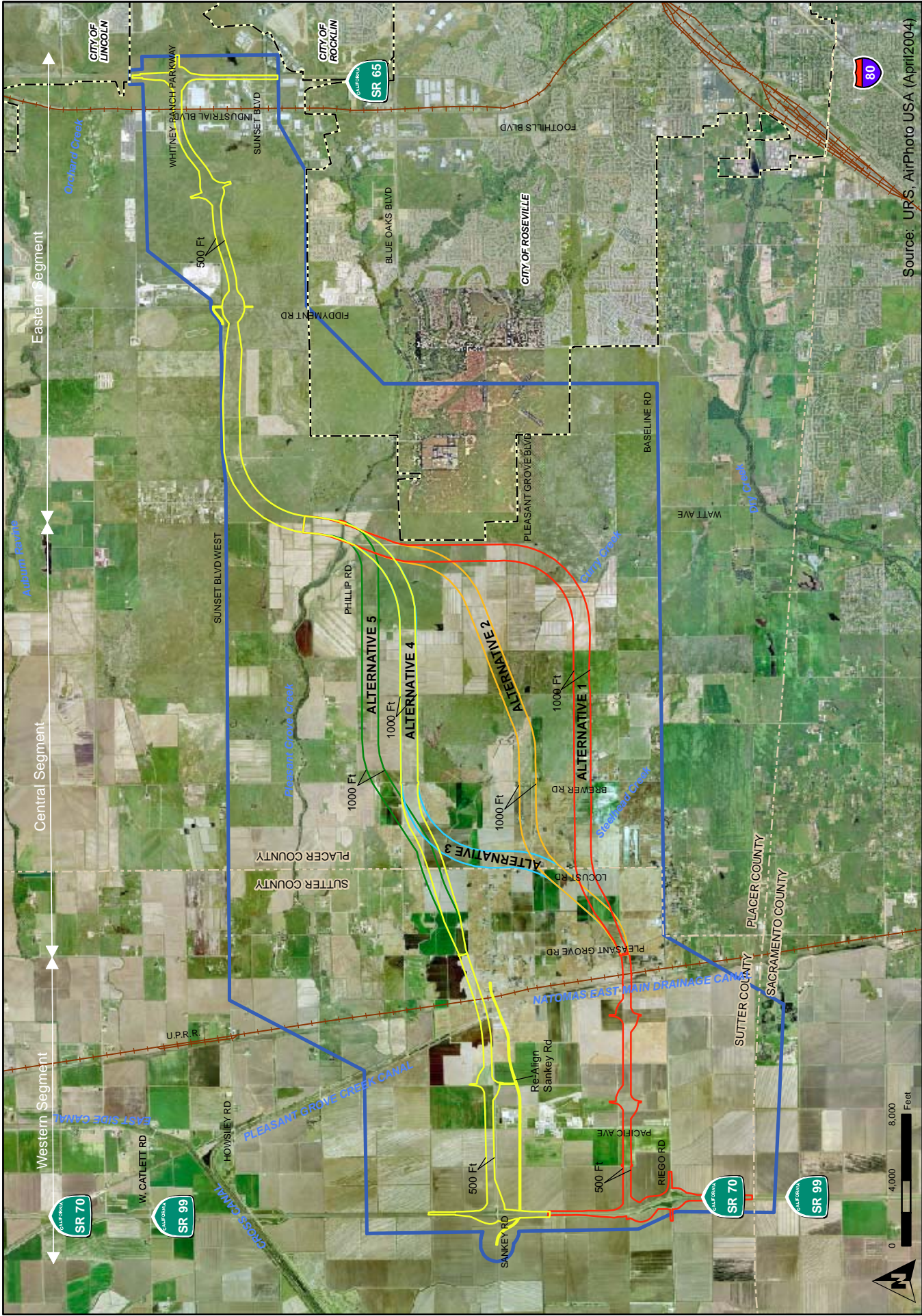
**Tier 1 EIS/EIR**

**Project Location Map**

**Figure 1**

**January 2009**





**Figure 2**  
**January 2009**

**Project Alternatives**

**Tier 1 EIS/EIR**

PLACER PARKWAY  
 PLACER COUNTY  
 SUTTER COUNTY  
 SACRAMENTO COUNTY

- Alternative 1
- Alternative 2
- Alternative 3
- Alternative 4
- Alternative 5
- Study Area Boundary
- County Boundary
- City Boundary

Source: URS, AirPhoto USA (April 2004)

**Appendix B3**  
**Notice of Availability of Partially Revised Draft Tier 1 EIS/EIR**  
**(extension of comment period) – March 2009**



**NOTICE OF AVAILABILITY FOR PUBLIC REVIEW  
PARTIALLY REVISED DRAFT TIER 1 ENVIRONMENTAL IMPACT  
STATEMENT/PROGRAM ENVIRONMENTAL IMPACT REPORT**

**(EXTENSION OF COMMENT PERIOD)**

On January 23, 2009, the Federal Highways Administration (FHWA), California Department of Transportation (Caltrans), and South Placer Regional Transportation Authority (SPRTA) released a Partially Revised Draft Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR) for the Placer Parkway Corridor Preservation Project.

**This Notice of Availability is being issued to provide public notification of an extension to the comment period.** The original comment period began on Jan 23, 2009 and closed on March 16, 2009. To allow for additional public comment, the comment period has been extended for an additional 45 days. The additional time for comments begins March 27, 2009 and ends on May 11, 2009.

**Proposed Action/Project:** Placer Parkway Corridor Preservation Project (FHWA Report Number: FHWA-CA-DEIS 2007-46 and State Clearinghouse Number: 2003092069).

**Project Description:** FHWA, Caltrans, and SPRTA propose to select and preserve a corridor for the future construction of Placer Parkway, a new east-west roadway linking State Route (SR) 70/99 in Sutter County east to SR 65 in Placer County. Specifically, the action being considered and evaluated is to select and preserve a 500- to 1,000-foot-wide corridor in the project study area, within which the future four- or six-lane Placer Parkway may be constructed. Placer Parkway is intended to reduce anticipated congestion on both the local and regional transportation system and to advance economic development goals in south Sutter County and southwestern Placer County.

Five build alternatives and a no-build alternative are evaluated in the Tier 1 EIS/EIR. Although the Parkway would be designed and construction-level impacts analyzed during Tier 2, for the purpose of the Tier 1 EIS/EIR, several assumptions have been made about potential design and configuration concepts. These assumptions would be subject to further development and refinement, and specific decisions about design of the roadway would be made during the Tier 2 process. The Parkway would be a high-speed, limited access roadway. Conceptually, interchanges would be located at SR 70/99 (at one-half mile north of Riego Road or at Sankey Road), one or two locations to be determined in southern Sutter County, Fiddymont Road, Foothills Boulevard, and SR 65 at Whitney Ranch Parkway. Access would be restricted for the 7-mile segment between Pleasant Grove Road and Fiddymont Road. The Tier 1 EIS/EIR assumes no interchanges in this segment.

The Parkway may be designed and constructed incrementally in segments. These could be built as a four-lane (interim) roadway until a six-lane segment is warranted, or as the full six-lane facility. The roadway would include a center median approximately 100 to 134 feet wide, depending on local conditions and reflecting Caltrans safety guidance. For the purposes of the Tier 1 EIS/EIR, the Parkway's opening year is assumed to be 2020.

**Project Location:** South Sutter County and Southwestern Placer County, California.

**Tier 1 Concept:** The planning for Placer Parkway involves two phases: (1) the present action, selection of a corridor (titled the Placer Parkway Corridor Preservation Project), and (2) the future selection of a precise alignment within the corridor and a decision whether or not to build the Parkway. If a build alternative is selected and pursued after the second phase, the ultimate Placer Parkway project would be constructed and operated.

Each phase will be subject to its own environmental review, a process known as “tiered” environmental review under both state and federal law. The selection of a corridor is the subject of the Tier 1 EIS/EIR. To the degree feasible the Tier 1 EIS/EIR reviews the reasonably foreseeable environmental effects of the construction and operation of the Parkway. Selection of a more precise alignment within the corridor, and construction and operation of the Parkway, will be the subject of a later, Tier 2 environmental document.

**Revisions to the Draft Tier 1 EIS/EIR and Additional Analyses in the Partially Revised Draft Tier 1 EIS/EIR:** The Partially Revised Draft Tier 1 EIS/EIR serves as a supplement to the Draft Tier 1 EIS/EIR issued in June 2007, to reflect additional analyses developed since the publication of the prior draft. The Partially Revised Tier 1 EIS/EIR provides revisions to the Draft Tier 1 EIS/EIR, including updates to farmland classification data and greenhouse gas emissions. It also includes additional analyses of growth inducement, secondary and indirect impacts and cumulative impacts based on hypothetical future scenarios prepared for the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers.

**Public Review and Comment Period:** The additional comment period commences on March 27, 2009 and lasts for 45 days. **Comments will be accepted until 5:00 p.m. on May 11, 2009.** Comments should be submitted in writing to Placer County Transportation Planning Agency (PCTPA) via regular mail to PCTPA, Attention: Celia McAdam, Executive Director, 299 Nevada St., Auburn, California 95603, or via email to [pctpap@pctpap.net](mailto:pctpap@pctpap.net). Notice of the release of this Partially Revised Draft EIS for public review has also been published by the U.S. Environmental Protection Agency in the Federal Register dated March 27, 2009.

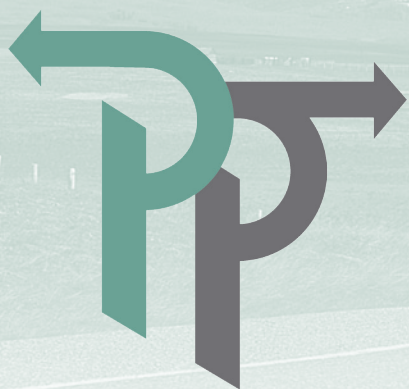
**Availability of the Partially Revised Draft Tier 1 EIS/EIER for Public Review:** Copies are available for review at the following locations:

Placer County Transportation Planning Agency 299 Nevada Street, Auburn, CA	Sutter County Planning Department 1130 Civic Center Blvd., Yuba City, CA
Placer County Planning Department 3091 County Center Drive, Auburn, CA	Sacramento County Planning Department 827 7th Street, Room 230, Sacramento, CA
Placer County Public Works Department 3091 County Center Drive, Auburn, CA	Roseville Public Library - Downtown 225 Taylor Street, Roseville CA
Placer County Library 350 Nevada Street, Auburn, CA	Roseville Public Library - Maidu 1530 Maidu Drive, Roseville CA
Placer County Library, Loomis 6050 Library Drive, Loomis, CA	Rocklin Library 5400 Fifth Street, Rocklin, CA
Sutter County Library, Main Branch 7504 Forbes Avenue, Yuba City, CA	Lincoln Library 590 Fifth Street, Lincoln, CA
Sutter County Library, Pleasant Grove Branch 3093 Howsley Road, Pleasant Grove, CA	Sierra College Library 5000 Rocklin Road, Rocklin, CA
Sutter County Library, Browns Branch 1248 Pacific Avenue, Rio Oso, CA	Sacramento County Library, North Natomas 2500 New Market Drive, Sacramento, CA
Sacramento County Public Library 828 I Street, Sacramento, CA	Sacramento County Library, North Highlands – Antelope 4235 Antelope Road, Antelope, CA
California State University 6000 J Street, Sacramento, CA	

Copies can also be obtained electronically from PCTPA’s project website at [www.pctpap.net](http://www.pctpap.net). Additional information, including documents referenced in the Partially Revised Draft Tier 1 EIS/EIR, may be obtained by contacting Celia McAdam at the Placer County Transportation Planning Agency at 530-823-4030, Monday through Friday between the hours of 9:00 a.m. and 5:00 pm.

**Appendix B4**  
**Newsletter – February 2007**





# PLACER PARKWAY

## CORRIDOR PRESERVATION

## Alternatives Selected for Tier 1 EIS/EIR Analysis

Placer Parkway is envisioned as a 15-mile-long high-speed transportation facility connecting State Route (SR) 65 in Placer County and SR 70/99 in Sutter County. The facility will be constructed within a 500-foot- to 1,000-foot-wide corridor. It will reduce pressure on the existing transportation network, address anticipated future congestion on the local roadway system in southwestern Placer County and south Sutter County, and improve regional accessibility for businesses and jobs in the project vicinity. Other potential transportation modes, such as bus rapid transit, may be developed in the corridor.

### FIVE CORRIDOR ALIGNMENT ALTERNATIVES TO BE STUDIED

The concept for the Placer Parkway is over a decade old. Since 2002, the South Placer Regional Transportation Authority (SPRTA), via the Placer County Transportation Planning Agency (PCTPA), has worked to identify corridor alternatives to be analyzed in the Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR). In September 2005, the SPRTA Board agreed on five corridor alignment alternatives for study in the Tier 1 EIS/EIR. This includes four alternatives identified in 2004 and one identified as a result of additional analysis in 2005.

These alternatives are based on a screening process (involving environmental, transportation, and engineering factors) and a public participation program. The program was built on the work of three advisory committees, two public scoping meetings, and two public workshops. Input was also received from a variety of federal, state, regional,

and local agencies; stakeholders, and other interested organizations and individuals.

The corridors to be evaluated are shown on the map (see back panel). A “No Build” alternative will also be evaluated. Federal agencies, including Federal Highway Administration, the U.S. Army Corps of Engineers, and the U.S. Environmental Protection Agency, have agreed that these alternatives represent an appropriate range of alternatives to study in the TIER 1 EIS/EIR.

### WHERE ARE WE NOW?

Technical studies focusing on a range of human and natural environmental resources have been prepared. The Draft Tier 1 EIS/EIR is in preparation. It should be available for public review by summer 2007.

### WHAT'S NEXT?

Public hearings to receive comments on the Draft Tier 1 EIS/EIR will be held in Placer and Sutter counties. All comments will be addressed in the Final Tier 1 EIS/EIR; which is expected to be ready by summer 2008.

A **TIER 1 EIS/EIR** is a combined Federal/State environmental review document. It emphasizes the relative differences among corridor alternatives to allow for an informed choice among alternatives. It focuses on broad topics and strategies for their mitigation.

The **TIER 1** process will identify a preferred corridor that narrows down the area where the Parkway will be located. This will allow SPRTA to begin acquiring land for right-of-way.

A **TIER 2** environmental document, relying on this Tier 1 EIS/EIR, will provide a more detailed analysis of environmental impacts for specific alignments within the selected corridor. Tier 2 environmental clearance will be required before construction can begin.

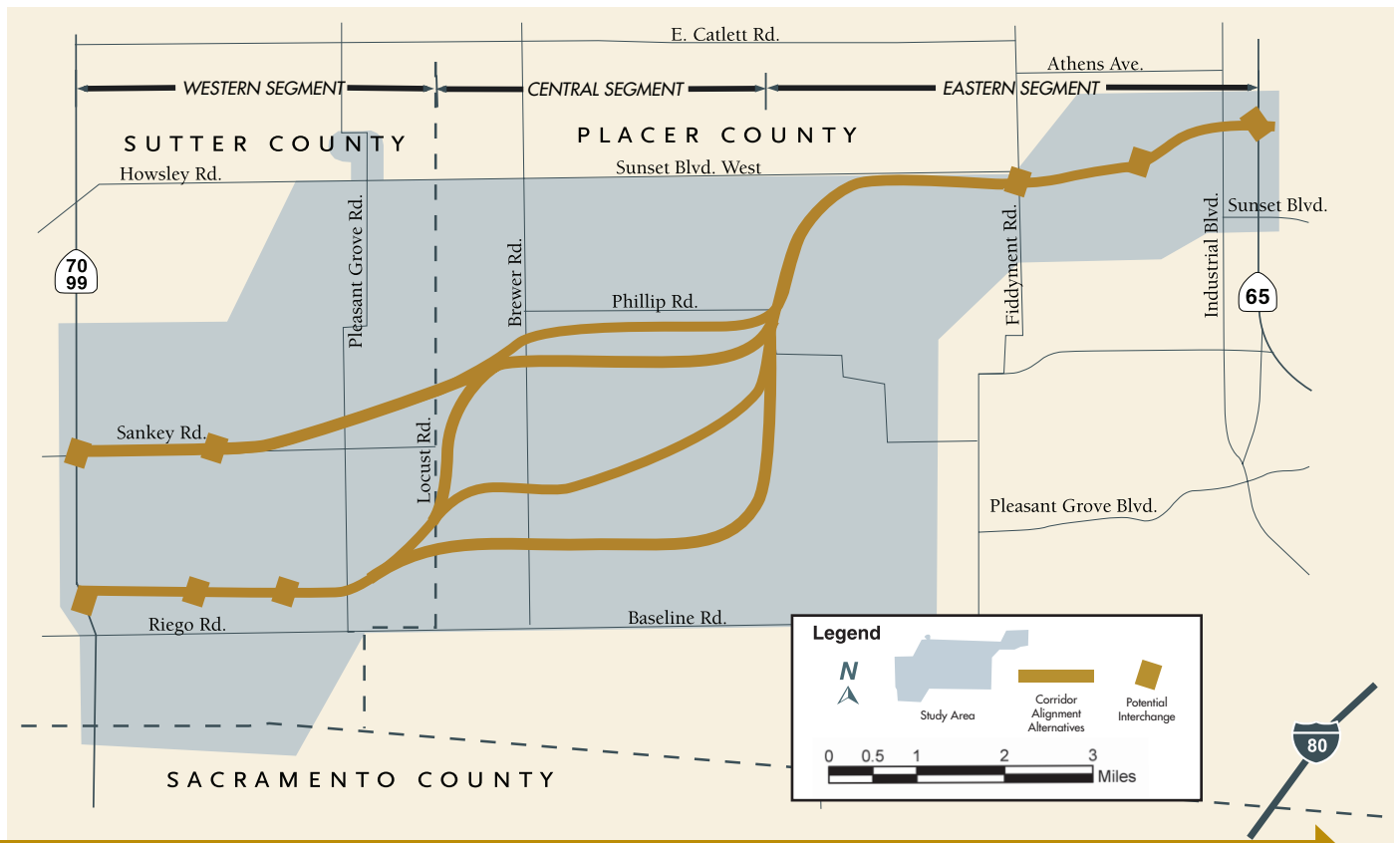


Need more information?  
Want to express your opinion?

- Visit the PCTPA project website at [www.pctpa.org](http://www.pctpa.org).
- E-mail PCTPA at [pctpa@pctpa.org](mailto:pctpa@pctpa.org)
- Call PCTPA at 530-823-4030
- Send comments to:  
PCTPA  
299 Nevada St.  
Auburn, CA 95603

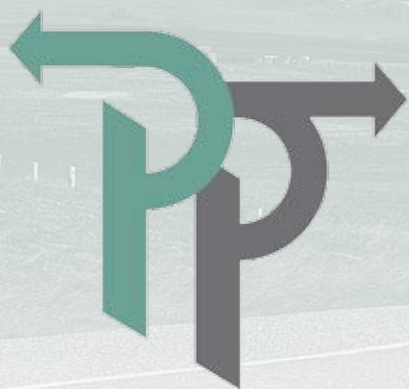
## placer parkway corridor preservation project corridor alignment alternatives

FOR TIER 1 EIS/EIR ANALYSIS



**Appendix B5**  
**Newsletter – July 2007**





# PLACER PARKWAY

## CORRIDOR PRESERVATION

## Draft Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project

### PUBLIC HEARINGS & PUBLIC COMMENTS

The SPRTA Board will conduct public hearings on the dates indicated below. The objective of the hearings is to receive comments on the Draft Tier 1 EIS/EIR and its adequacy. At each hearing, there will be a short presentation about the proposed project and the environmental review. The public, as well as agencies, organizations, and other interested individuals, are invited to attend and to make comments. See the last page for information on other ways to make formal comments.

#### Sutter County

**August 6, 2007 at 7:00 p.m.**

VETERANS MEMORIAL  
COMMUNITY BUILDING

1425 Veterans Memorial Circle  
Yuba City, California

#### Placer County

**August 8, 2007 at 7:00 p.m.**

ROSEVILLE CITY HALL  
COUNCIL CHAMBERS

311 Vernon Street  
Roseville, California

The Federal Highway Administration (FHWA), the California Department of Transportation (Caltrans), and the South Placer Regional Transportation Authority (SPRTA) propose to select and preserve a corridor for the future construction of Placer Parkway, a new east-west roadway linking State Route (SR) 70/99 in Sutter County east to SR 65 in Placer County.

The Draft Tier 1 Environmental Impact Statement/Program Environment Impact Report (Tier 1 EIS/EIR) for the Placer Parkway Corridor Preservation Project was released for public review on July 2, 2007. The Tier 1 EIS/EIR describes why the project is being proposed, presents alternatives considered for the project, describes the affected environment, and evaluates the impacts of each alternative.

### WHAT IS THE PLACER PARKWAY?

Placer Parkway is envisioned as a 15-mile-long high-speed transportation facility connecting State Route (SR) 65 in Placer County and SR 70/99 in Sutter County. The facility will be constructed within a 500-foot- to 1,000-foot-wide corridor. It will reduce pressure on the existing transportation network, address anticipated future congestion on the local roadway system in southwestern

Placer County and southern Sutter County, and improve regional accessibility for businesses and jobs in the project vicinity. Other potential transportation modes, such as bus rapid transit, may be developed in the future in the corridor.

The concept for Placer Parkway is over a decade old. Detailed planning began in the late 1990's with the Conceptual Plan and the Project Study Report in 2001. The Placer Parkway project is an important component of the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan.

In 2003, SPRTA, via the Placer County Transportation Planning Agency (PCTPA), began work to identify the corridor alternatives to be analyzed in the Tier 1 EIS/EIR. In September 2005, after an extensive screening process and public participation program, the SPRTA Board agreed on five corridor alignment alternatives including a "No Build" alternative. In 2006, the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency also agreed that these are a reasonable range of alternatives to evaluate. The corridor alternatives that are evaluated are shown on the map inside.

A Tier 1 EIS/EIR is a combined Federal/State environmental review document. It emphasizes the relative differences among corridor alternatives to allow for an informed choice among alternatives. It focuses on broad topics and strategies for their mitigation. The Tier 1 process will identify a preferred corridor, which will allow SPRTA to acquire land. A Tier 2 environmental document, relying on this Tier 1 EIS/EIR, will provide a more detailed analysis of environmental impacts for specific alignments within the selected corridor.

### NEED MORE INFORMATION?

- Visit the PCTPA project website at [www.pctpa.org](http://www.pctpa.org)
- E-mail PCTPA at [pctpa@pctpa.org](mailto:pctpa@pctpa.org)
- Call PCTPA at 530-823-4030

### DRAFT TIER 1 EIS/EIR

The Draft Tier 1 EIS/EIR addresses requirements of the National Environmental Protection Policy Act (NEPA) and the California Environmental Quality Act (CEQA). In general, NEPA's Environmental Impact Statement (EIS) and CEQA's Environmental Impact Report (EIR) contain similar terms and processes. Both are disclosure documents prepared to ensure that environmental factors are taken into consideration by government decision-makers. One important difference between the two is determining the significance of an impact. Some impacts determined to be significant under CEQA may not lead to a determination of significance under NEPA.

From the CEQA view, the Draft Tier 1 EIS/EIR identifies that the following significant environmental effects cannot be avoided if the Placer Parkway project is implemented:

#### LAND USE

- Land use conversion
- Compatibility with proposed land uses
- Consistency with applicable General Plan policies

#### FARMLAND

- Farmland conversion
- Williamson Act conversion
- Conflicts with agricultural plans or policies

#### VISUAL AND AESTHETICS

- Change in visual character and quality of the study area

#### CULTURAL RESOURCES

- Potential substantial adverse change in the significance of a historic resource

#### TRAFFIC AND TRANSPORTATION

- Addition of traffic on SR 70/99 (between I-5 and Elkhorn Boulevard), and on SR 65 (between I-80 and the SR 65 Lincoln Bypass), thereby lengthening the period of time during the peak period where these two freeways operate at Level of Service F conditions

#### AIR QUALITY

- Construction air quality impacts would exceed the Placer County Air Pollution Control District (PCAPCD) and the Feather River Air Quality Management District's (FRAQMD) construction emissions thresholds for reactive organic gases (ROG), oxides of nitrogen (NO<sub>X</sub>), and particulate matter less than or equal to 10 microns (PM<sub>10</sub>)
- All build alternatives would exceed the FRAQMD significance thresholds for ROG and NO<sub>X</sub>

#### NOISE

- Exceedances of noise standards set by FHWA and Caltrans, and exceedances of noise thresholds as specified in the Sutter and Placer County General Plans

#### BIOLOGICAL RESOURCES

- Potential to affect seven special-status species and their habitat: the vernal pool fairy shrimp, vernal pool tadpole shrimp, Valley elderberry longhorn beetle, Swainson's hawk, white-tailed kite, giant garter snake, and Boggs Lake hedge hyssop
- Potential loss of vernal pool species and their habitat

#### GROWTH

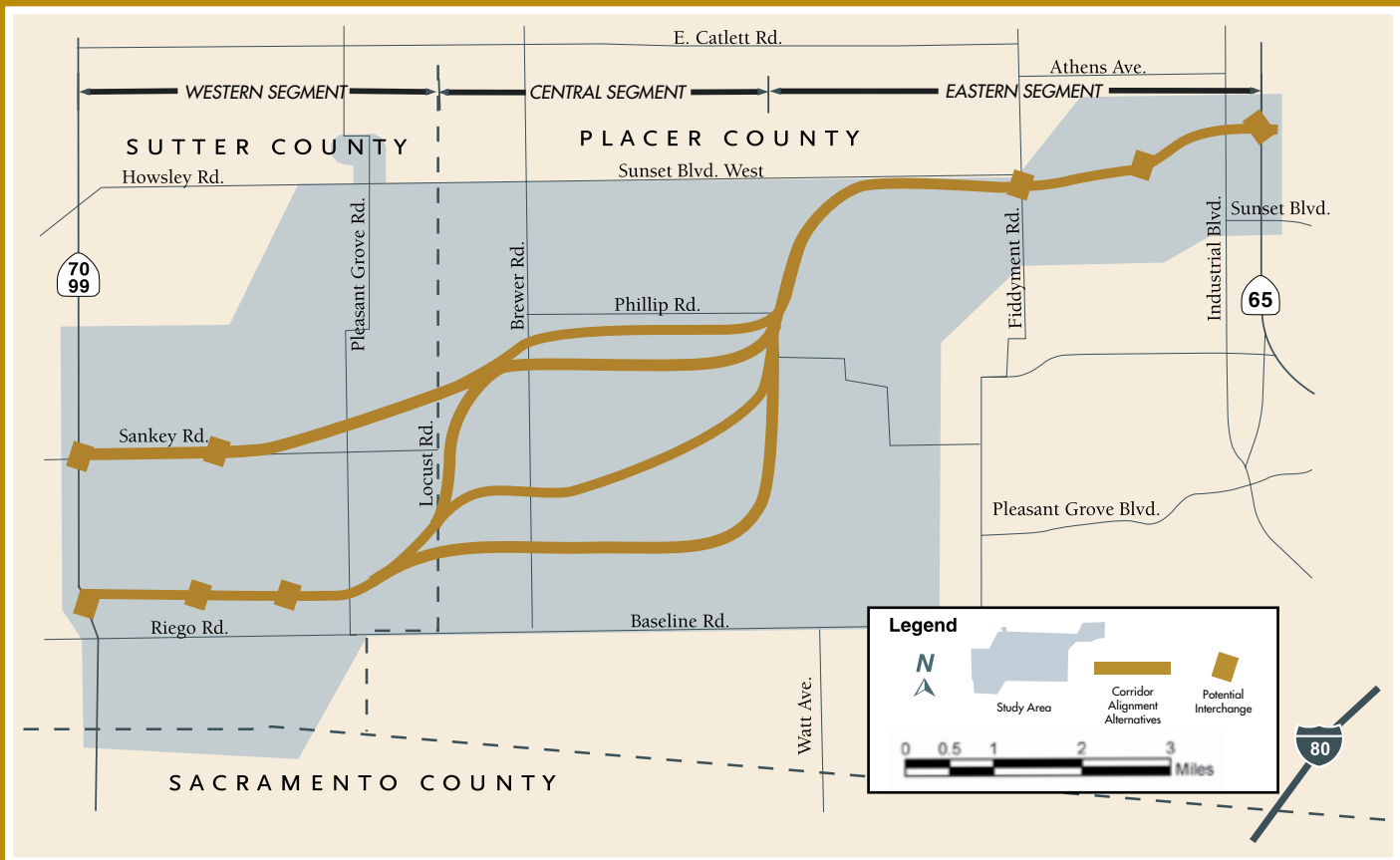
- One of many factors that would encourage growth in and near the study area by extending and improving the regional transportation system

#### CUMULATIVE IMPACTS

- Farmland and Williamson Act conversion, visual resources and cultural resources, traffic and transportation in some locations, air quality, noise, hydrology and water quality, and biological resources

# corridor alignment alternatives

## FOR TIER 1 EIS/EIR ANALYSIS



The Draft Tier 1 EIS/EIR does not identify a “preferred” corridor alternative. This alternative will be identified in the Final Tier 1 EIS/EIR based on comments received on the Draft Tier 1 EIS/EIR.

### WHAT’S NEXT?

Once the comment period closes, a Final Tier 1 EIS/EIR will be prepared, which responds to all the environmental comments received on the Draft Tier 1 EIS/EIR. A preferred corridor alignment will also be identified. The Final Tier 1 EIS/EIR is expected to be complete by the summer of 2008.

The Final Tier 1 EIS/EIR will be made available for public review before FHWA and SPRTA take action on the environmental work and the proposed project. The Sutter County Board of Supervisors will separately consider formal adoption of the selected corridor within its jurisdiction, based on the Final Tier 1 EIS/EIR.

### WHERE YOU CAN FIND COPIES OF THE DRAFT TIER 1 EIS/EIR

On June 29, 2007, a notice that the Draft Tier 1 EIS/EIR is available for review was sent to over 1770 individuals, agencies, and organizations, and in early July a similar notice was published in the Federal Register. The Draft Tier 1 EIS/EIR can be reviewed at the following locations:

- **PCTPA**, 299 Nevada Street, Auburn and on its web site, [www.pctpa.org](http://www.pctpa.org)
- **Planning and Public Works Departments** at Placer, Sutter, and Sacramento counties as well as the cities of Lincoln, Rocklin, Roseville, Sacramento, Yuba City, and the Town of Loomis
- **Libraries** in Placer County (Auburn, Lincoln, Loomis, Rocklin, and Roseville); Sutter County (Rio Oso, Pleasant Grove, and Yuba City); Sacramento County (Antelope and Sacramento), as well as at Sacramento State University and Sierra College



## please participate!

There are two ways to comment on the Draft Tier 1 EIS/EIR:


- 1 Attend and participate at the public hearings, and/or
- 2 Write to (or email) Celia McAdam, Executive Director, PCTPA, 299 Nevada St., Auburn, California 95603, or [pctpa@pctpa.org](mailto:pctpa@pctpa.org)

All comments made at the public hearings or received in writing will be recorded and addressed in the project's Final Tier 1 EIS/EIR. **All comments must be submitted by August 20, 2007.**

## check us out online! [www.pctpa.org](http://www.pctpa.org)

PCTPA's website ([www.pctpa.org](http://www.pctpa.org)) is home to information about the Placer Parkway Project. From the PCTPA home page, just click on [projects], then on Placer Parkway. There you will find project documents, newsletters, meeting notices and other relevant materials to keep you informed.

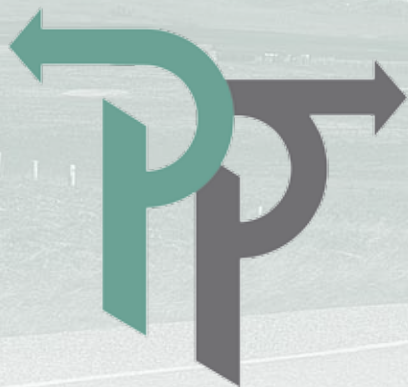
FIRST CLASS  
US POSTAGE  
PAID  
OAKLAND, CA  
PERMIT #96

  
PLACER PARKWAY  
GOVERNOR PRESERVATION  
PCTPA  
299 Nevada Street  
Auburn, CA 95603

**Appendix B6**  
**Newsletter – January 2009**







# PLACER PARKWAY

## CORRIDOR PRESERVATION

# Partially Revised Draft Tier 1 EIS/EIR Set for January Release

### PLACER PARKWAY CORRIDOR PRESERVATION UPDATE

The Placer Parkway Corridor Preservation Draft Tier 1 Environmental Impact Statement/ Environmental Impact Report (Draft Tier 1 EIS/EIR) was circulated for public comment on July 2, 2007. It analyzed the impacts of five Build Corridor Alternatives (to connect SR 70/99 in south Sutter County to SR 65 in Placer County) and a No-Build Alternative. The comment period ended on September 10, 2007. Approximately 50 public hearing and written comments were received.

The Federal Highway Administration (FHWA), the California Department of Transportation (Caltrans), and the South Placer Regional Transportation Authority (SPRTA) propose to select and preserve a corridor for the future construction of Placer Parkway, a new east-west roadway linking State Route (SR) 70/99 in Sutter County east to SR 65 in Placer County.

#### WHAT IS THE PLACER PARKWAY?

Placer Parkway is envisioned as a 15-mile-long high-speed transportation facility connecting State Route (SR) 65 in Placer County and SR 70/99 in Sutter County. The facility will be constructed within a 500-foot- to 1,000-foot-wide corridor. It will reduce pressure on the existing transportation network, address anticipated future congestion on the local roadway system in southwestern Placer County and southern Sutter County, and improve regional accessibility for businesses and jobs in the project vicinity. Other potential transportation modes,

such as bus rapid transit, may be developed in the future in the corridor.

The concept for Placer Parkway is over a decade old. Detailed planning began in the late 1990's with the Conceptual Plan and the Project Study Report in 2001. The Placer Parkway project is an important component of the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan.

In 2003, SPRTA, via the Placer County Transportation Planning Agency (PCTPA), began work to identify the corridor alternatives to be analyzed in the Tier 1 EIS/EIR. In September 2005, after an extensive screening process and public participation program, the SPRTA Board agreed on five corridor alignment alternatives including a "No Build" alternative. In 2006, the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency also agreed that these are a reasonable range of alternatives to evaluate. The corridor alternatives that are evaluated are shown on the map inside.

A Tier 1 EIS/EIR is a combined Federal/State environmental review document. It emphasizes the relative differences among corridor alternatives to allow for an informed choice among alternatives. It focuses on broad topics and strategies for their mitigation. The Tier 1 process will identify a preferred corridor, which will allow SPRTA to acquire land. A Tier 2 environmental document, relying on this Tier 1 EIS/EIR, will provide a more detailed analysis of environmental impacts for specific alignments within the selected corridor.

### SPRTA BOARD DIRECTION

The South Placer Regional Transportation Authority (SPRTA) Board conducted a February 27, 2008 workshop in response to several comments about how the project's access and no-development buffer components were treated in the Draft Tier 1 EIS/EIR. These components would limit access (no new interchanges) between Pleasant Grove Road and Fiddymont Road and would create a 'no-development' buffer along the future roadway. The limited access provision would ensure that the future freeway is free-flowing and reduce the potential for growth inducement. The no-development buffer would establish a variable area next to the freeway that would be protected from development, to enhance the "Parkway" concept and reduce the potential for growth inducement.

The comments identified concerns that in the future, new proposals by others might result in additional interchanges, or reduce/eliminate the no-development buffer, resulting in potentially more growth inducement. The workshop's purpose was to develop a strategy to address these concerns and move forward with the environmental review process. On March 26, 2008 the Board directed staff to prepare and circulate for public comment, an analysis of these hypothetical future actions, even though such actions are not proposed by SPRTA or FHWA, and are not part of the project described or analyzed in the Tier 1 EIS/EIR. The SPRTA Board felt that this approach would provide a fuller disclosure of potential hypothetical future impacts if such actions were proposed by others in the future and would provide a stronger foundation for later Tier 2 (construction-level) environmental work, which will analyze the impacts of roadway alignments within the selected corridor.



### PARTIALLY REVISED DRAFT EIS/EIR

Based on this direction, additional analyses were prepared to evaluate potential growth inducement and associated secondary and indirect impacts that could occur as a result of these hypothetical future modifications to the Parkway. The results will be presented in a Partially Revised Draft Tier 1 EIS/EIR. This document will also include updated information on agricultural resources, details of recent amendments to local general plans and an updated discussion of greenhouse gases. The Partially Revised Draft Tier 1 EIS/EIR is expected to be circulated for public review in January 2009, with a 45-day public comment period.

### WHERE ARE WE NOW?

Staff is preparing responses to comments received on the Draft Tier 1 EIS/EIR. Coordination continues with the resources agencies to identify the Least Environmentally Damaging Practicable Alternative (LEDPA).

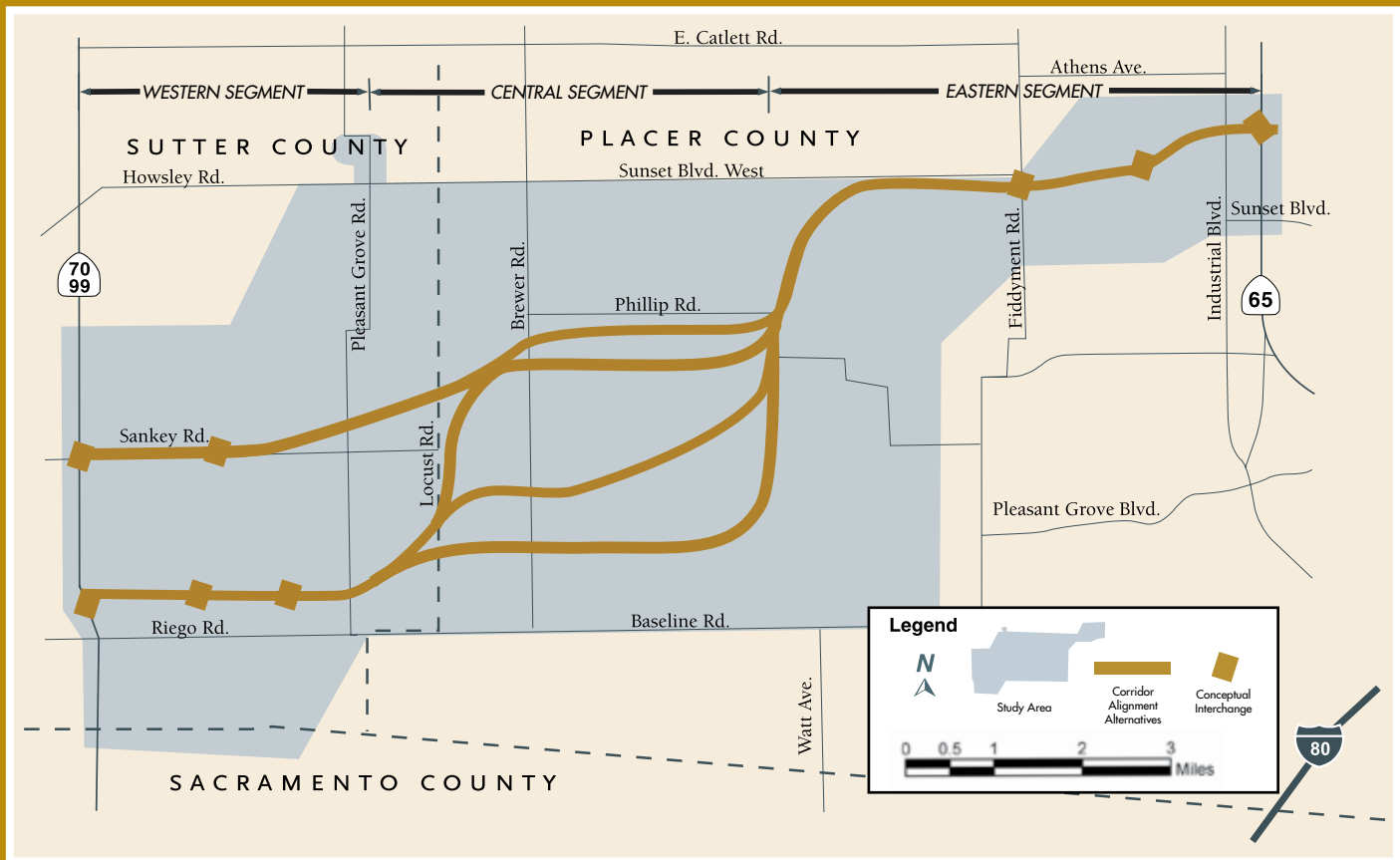
The Final Tier 1 EIS/EIR is expected to be ready by summer 2009. It will include comments received on both the Draft Tier 1 EIS/EIR and the Partially Revised Draft. It will also identify the preferred corridor alternative. Public hearings on the Final Tier 1 EIS/EIR will be held in Sutter and Placer counties.

### NEED MORE INFORMATION?

- Visit the PCTPA project website at [www.pctpa.net](http://www.pctpa.net)
- E-mail PCTPA at [pctpa@pctpa.net](mailto:pctpa@pctpa.net)
- Call PCTPA at 530-823-4030

# corridor alignment alternatives

## FOR TIER 1 EIS/EIR ANALYSIS



### WHERE YOU CAN FIND COPIES OF THE PARTIALLY REVISED DRAFT TIER 1 EIS/EIR

The Partially Revised Draft Tier 1 EIS/EIR will be available for review at:

- Placer County Transportation Planning Agency (PCTPA), 299 Nevada Street, Auburn, CA
- Planning and Public Works Departments at Placer, Sutter, and Sacramento counties as well as the cities of Lincoln, Rocklin, Roseville, Sacramento, Yuba City, and the Town of Loomis.
- Public libraries in Placer County (Auburn, Loomis, Rocklin, and Roseville); Sutter County (Rio Oso, Pleasant Grove, and Yuba City; Sacramento County (Antelope and Sacramento), as well as Sacramento State University and Sierra College.
- [www.pctpa.net](http://www.pctpa.net)




## what should you do to submit comments

You will receive a Notice of Availability (NOA) of the Partially Revised Draft Tier 1 EIS/EIR. Comments may be submitted by the deadline, which will be identified in the NOA. Comments can be sent via regular mail to:  
*Celia McAdam, PCTPA Executive Director, 299 Nevada St.,  
Auburn, CA 95603, or via email to [pctp@pctp.net](mailto:pctp@pctp.net).*

## check us out online! [www.pctp.net](http://www.pctp.net)

PCTPA's website ([www.pctp.net](http://www.pctp.net)) is home to information about the Placer Parkway Project. From the PCTPA home page, just click on [projects], then on Placer Parkway. There you will find project documents, newsletters, meeting notices and other relevant materials to keep you informed.

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299 Nevada Street  
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**Appendix B7**  
**Newsletter – November 2009**





# PLACER PARKWAY

## CORRIDOR PRESERVATION

### PLACER PARKWAY CORRIDOR PRESERVATION UPDATE

The Placer Parkway Corridor Preservation Draft Tier 1 Environmental Impact Statement/Environmental Impact Report (Draft Tier 1 EIS/EIR) was circulated for public comment on July 2, 2007. It analyzed the impacts of five Build Corridor Alternatives (to connect SR 70/99 in south Sutter County to SR 65 in Placer County) and a No-Build Alternative. The Partially Revised Draft Tier 1 EIS/EIR was circulated for public comment on January 30, 2009. It updated data from the 2007 Draft Tier 1 EIS/EIR and provided additional growth analyses.

## Final Tier 1 EIS/EIR for Placer Parkway Corridor Preservation—Available in November!

The Federal Highway Administration (FHWA), the California Department of Transportation (Caltrans), and the South Placer Regional Transportation Authority (SPRTA) have completed the Final Tier 1 Environmental Impact Statement/Program Environmental Impact Report (Final Tier 1 EIS/EIR) for the Placer Parkway Corridor Preservation project. The document provides information under federal (National Environmental Policy Act–NEPA) and state (California Environmental Quality Act–CEQA) law.

Placer Parkway is proposed as a new east-west roadway linking State Route (SR) 70/99 in Sutter County to SR 65 in Placer County. Placer Parkway is intended to reduce anticipated congestion on both the local and regional transportation system and to advance economic development goals in south Sutter County and southwestern Placer County. The Final Tier 1 EIS/EIR evaluates selection of a corridor within which the future Placer Parkway would be constructed.

### FINAL TIER 1 EIS/EIR

Of the five corridor alignment alternatives considered, the Final Tier 1 EIS/EIR identifies Alternative 5 with a

no-access buffer as the Preferred Alternative under NEPA and the Environmentally Superior Alternative under CEQA (see map), subject to selection by FHWA and SPRTA. This conclusion was based on the 2007 Draft Tier 1 EIS/EIR, the 2009 Partially Revised Draft Tier 1 EIS/EIR (PRD), comments received on these documents, and on-going coordination with federal/state agencies and local jurisdictions.

Alternative 5 would have the fewest direct impacts to farmlands, wetlands, and Swainson's Hawk and White-Tailed Kite foraging habitat. It would be the least archeologically sensitive alternative. Other features of Alternative 5:

- Corridor most likely to contain the Least Environmentally Damaging Practicable Alternative (LEDPA), as determined by the U.S. Army Corps of Engineers and U.S. Environmental Protection Agency. This was based on a conservation framework, which would help to prevent new interchanges for an approximately 5-mile-long segment (see map).
- Least potential for inducing growth.
- Least potential for secondary and indirect impacts on biological resources—including the lowest



# placer parkway corridor preservation project

## FINAL TIER 1 EIS/EIR AVAILABLE IN NOVEMBER

A Tier 1 EIS/EIR is a combined federal/state environmental review document. It emphasizes the relative differences among corridor alternatives to allow for an informed choice among alternatives. It focuses on broad topics and strategies for their mitigation. The Tier 1 process is nearing completion. When complete, SPRTA will be able to acquire land for the Placer Parkway. A Tier 2 environmental document, relying on this Tier 1 EIS/EIR, will provide a more detailed analysis of environmental impacts for specific alignments within the selected corridor.

### NEED MORE INFORMATION?

- Visit the PCTPA project website at [www.pctpa.net](http://www.pctpa.net)
- E-mail PCTPA at [pctpa@pctpa.net](mailto:pctpa@pctpa.net)
- Call PCTPA at 530-823-4030

potential for habitat fragmentation.

- Most consistent with the regional habitat conservation plan (PCCP) being developed by Placer County.
- Shortest alternative which limits its potential direct effects and construction costs.
- Supported by Placer County, Sutter County and City of Roseville.

The Final Tier 1 EIS/EIR contains comments received on the Draft Tier 1 EIS/EIR and the PRD and responses to these comments. It identifies changes to those documents as a result of the public comment process. It also includes a Mitigation Monitoring and Reporting Program.

### FHWA, SPRTA AND SUTTER COUNTY ACTIONS

To complete the federal and state processes, the following will be required:

- **NEPA.** The FHWA will provide notice of availability of the Final Tier 1 EIS/EIR in the Federal Register 30 days prior to making a decision whether or not to select the Preferred Alternative. FHWA will explain its action in a Record of Decision. Comments related to the federal process should be sent to FHWA, Attn: Gary Sweeten, FHWA California Division, 650 Capitol Mall, Suite 4-100, Sacramento, CA 95814, no later than January 11, 2010.
- **CEQA.** The SPRTA Board of Directors is required to consider the information in the Final Program EIR before certifying the Final Tier 1 EIR as complete and before making a decision on the Preferred Alternative. The Board's certification hearing will

be held at 10:45 a.m. on December 3, 2009 at the Placer County Board of Supervisors Chambers, 175 Fulweiler Avenue, Auburn, CA 95603. Comments related to the state process should be sent to SPRTA, Attn: Celia McAdam, Executive Director, 299 Nevada Street, Auburn, CA 95603, before this hearing.

If the SPRTA Board approves the selection of Alternative 5, it will work with Placer and Sutter counties to amend their general plans to preserve this corridor for the future Placer Parkway. SPRTA and its member jurisdictions (Placer County and the cities of Roseville, Rocklin, and Lincoln) would also be able to acquire land for all or part of the selected corridor.

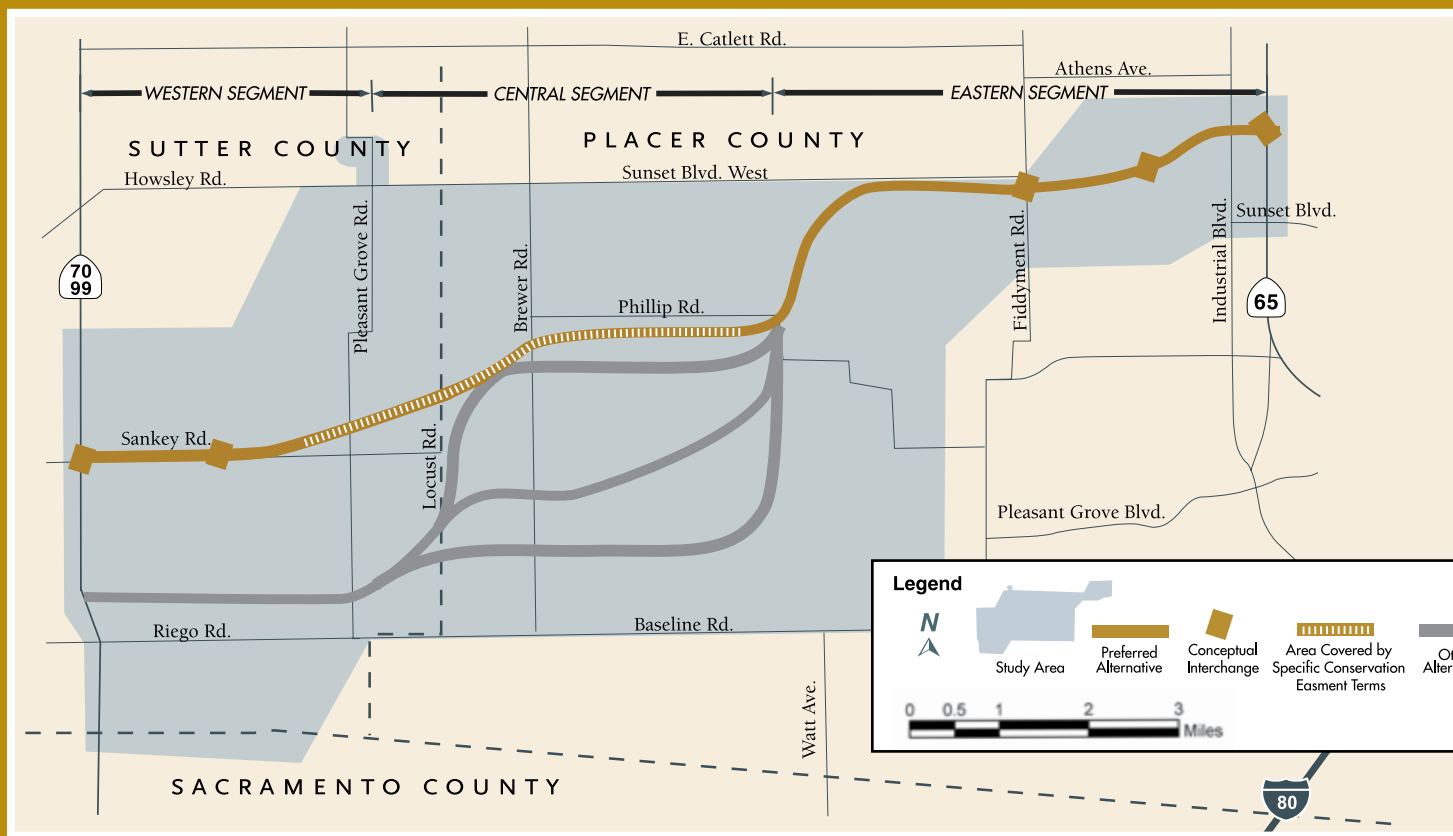
Sutter County (as a Responsible Agency) has actively participated in the environmental review process. The Sutter County Board of Supervisors will separately consider approval of the Preferred Alternative within its jurisdiction, based on the Final Program EIR.

### WHAT ABOUT PLACER PARKWAY CONSTRUCTION?

If Alternative 5 is approved, the "Tier 2" level environmental review can begin. This is sometimes referred to as the project-level or construction-level review. It will analyze the construction and operational impacts of specific roadway alignments within the selected corridor. Starting the Tier 2 process will depend on identifying a Lead Agency (or agencies) and funding availability.

No construction will occur until after Tier 2 environmental studies have been completed.

# preferred corridor alignment alternative



## WHERE YOU CAN FIND THE FINAL TIER 1 EIS/EIR

The Final Tier 1 EIS/EIR will be available in mid-November for public review at the Placer County Transportation Planning Agency, 299 Nevada Street, Auburn, CA 95603 and at the following additional locations:

**Placer County Planning Department,**  
3091 County Center Drive, Auburn

**Placer County Public Works  
Department,** 3091 County Center  
Drive, Auburn

**Sutter County Planning Department,**  
1130 Civic Center Blvd., Yuba City

**Sacramento County Planning  
Department,** 827 7th Street,  
Room 230, Sacramento

**Placer County Library,**  
350 Nevada Street, Auburn

**Placer County Library—Loomis,**  
6050 Library Drive, Loomis

**Sutter County Library—Main Branch,**  
750 Forbes Avenue, Yuba City

**Sutter County Library—Pleasant  
Grove Branch,** 3093 Howsley Road,  
Pleasant Grove

**Sutter County Library—Browns  
Branch,** 1248 Pacific Avenue,  
Rio Oso

**Sacramento County Public Library,**  
828 I Street, Sacramento

**California State University,**  
2000 State University Drive—East,  
Sacramento

**Roseville Public Library—  
Downtown,** 225 Taylor Street,  
Roseville

**Roseville Public Library—Maidu,**  
1530 Maidu Drive, Roseville

**Rocklin Library,** 5460 Fifth Street,  
Rocklin

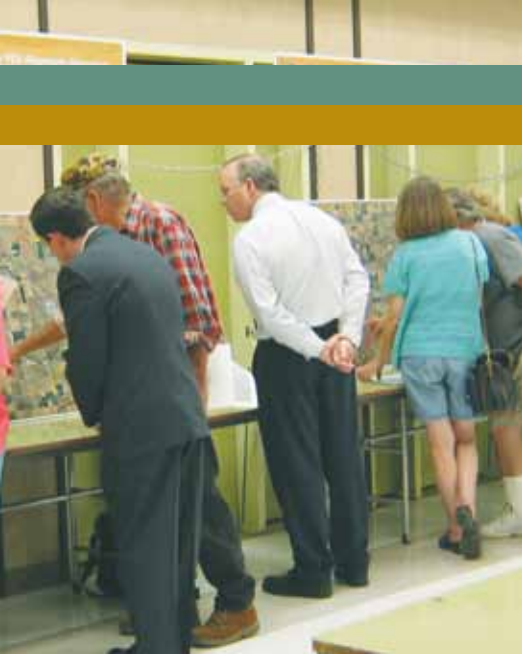
**Lincoln Library,** 590 Fifth Street,  
Lincoln

**Sierra College Library,** 5000 Rocklin  
Road, Rocklin

**Sacramento County Library—  
North Natomas,** 2500 New Market  
Drive, Sacramento

**Sacramento County Library,  
North Highlands—Antelope,**  
4235 Antelope Road, Antelope


Copies can also be obtained electronically from the PCTPA's project website at [www.pctpa.net](http://www.pctpa.net). Electronic copies are being distributed to all those who commented on the Draft Tier 1 EIS/EIR or the PRD.



## check us out **online!** [www.pctpa.net](http://www.pctpa.net)


PCTPA's website ([www.pctpa.net](http://www.pctpa.net)) is home to information about the Placer Parkway Project. From the PCTPA home page, just click on the Parkway logo. There you will find project documents, newsletters, meeting notices and other relevant materials to keep you informed.

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Auburn, CA 95603

**Appendix B8**  
**PowerPoint Presentation – August 2007 Public Hearings**

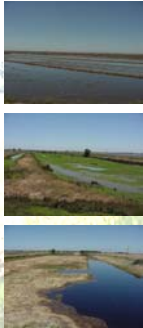




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Hearing Purpose

- The purpose of the hearing is to get your comments on the Draft Tier 1 EIS/EIR
- The SPRTA Board and staff will listen to and record your comments
- There are two ways to ensure your comments on the Draft Tier 1 EIS/EIR are addressed
  - Speak at either of the two public hearings
  - Write or email PCTPA, 299 Nevada Street, Auburn, CA 95603 [pctpa@pctpa.org](mailto:pctpa@pctpa.org)
- If you wish to speak, please fill out a speaker card and give it to the moderator or staff. Speakers will be called in order of sign-up.
- If you wish to comment, please fill out a comments card and give to the staff or mail to PCTPA
- Responses will be prepared to all comments, oral and written, and published in the Final Tier 1 EIS/EIR



Public Hearing August 6, 2007



**PLACER PARKWAY**  
CORRIDOR PRESERVATION


## Welcome

Public Hearing on the Draft Tier 1  
EIS/EIR Placer Parkway Corridor  
Preservation Project  
Yuba City/ Roseville, California

Monday, August 6/8, 2007  
7:00 PM to 9:00 PM



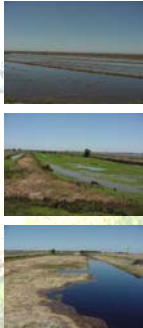
Public Hearing August 6, 2007




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Overview

- ◆ Project Background
  - Problem and Solution
  - Vicinity and Project Area
  - Project Challenges
- ◆ Draft Tier 1 EIS/EIR
  - Process
  - Alternatives Selection
  - Analysis Framework
  - Environmental Analysis
  - Environmental Impacts
  - Conclusions
- ◆ Next Steps



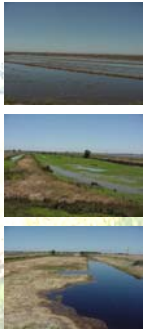
Public Hearing August 6, 2007




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Background

- ◆ High Priority Regional Transportation Connection
- ◆ Problem (Need)
  - Preserve ROW
  - Population Growth
  - Jobs Growth
- ◆ Solution (Purpose)
  - Preserve ROW for Future Roadway
  - Respond to Existing/Anticipated Travel Demand
  - Provide Access to Regional Transportation System for Planned and Projected Growth
- ◆ Partners
  - FHWA
  - Caltrans
  - SPRTA (PCTPA)

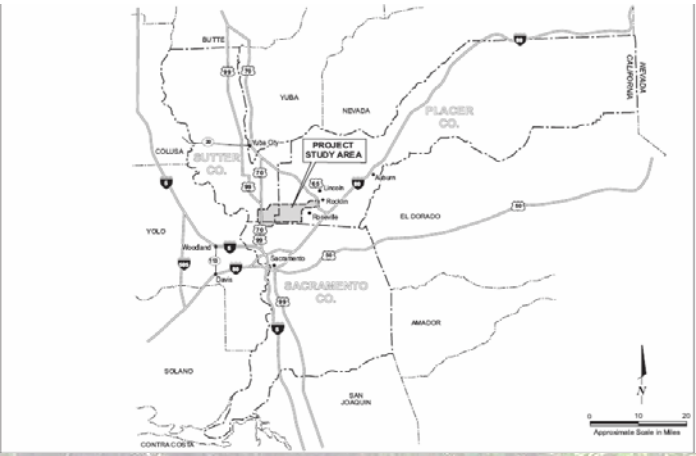
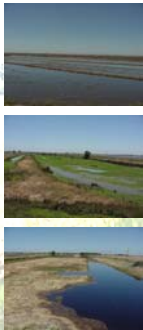


Public Hearing August 6, 2007



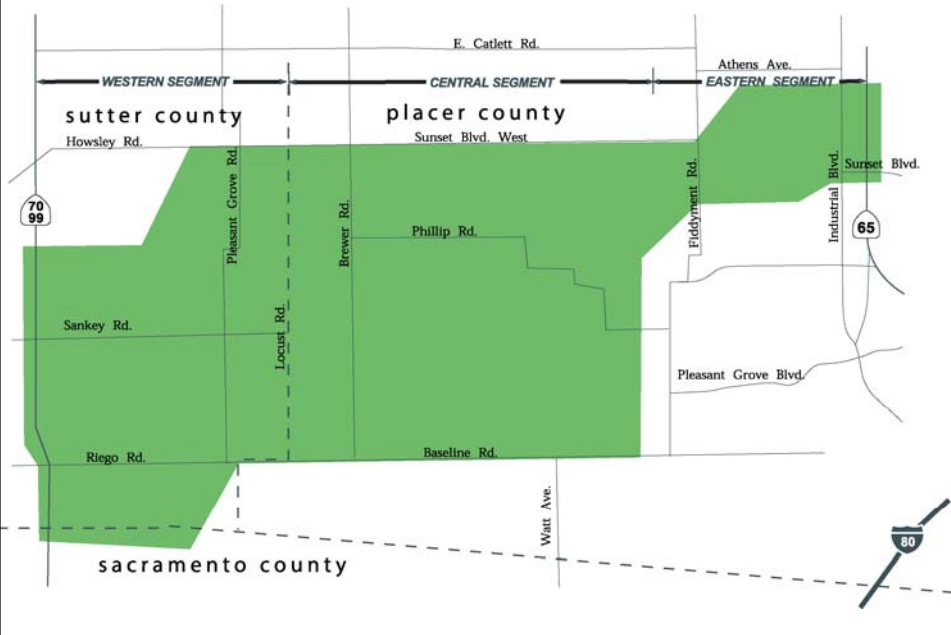
# PLACER PARKWAY CORRIDOR PRESERVATION

## Project Location

Public Hearing August 6, 2007

## Project Study Area



WESTERN SEGMENT      CENTRAL SEGMENT      EASTERN SEGMENT

sutter county      placer county

Howley Rd.      Sunset Blvd. West      Athens Ave.      Industrial Blvd.      Sunset Blvd.

Pleasant Grove Rd.      Phillip Rd.      Fiddymont Rd.      Pleasant Grove Blvd.

Sankey Rd.      Brewer Rd.      Baseline Rd.      Watt Ave.

Riego Rd.      Lucust Rd.      Sacramento county

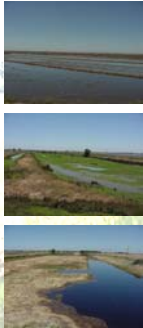





**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Project Challenges

- ◆ Feasible Range of Corridor Alignment Alternatives
- ◆ Tiering Environmental Review/ Concept
- ◆ Access and No-Development Buffer Policies
- ◆ Resource Agency Coordination
- ◆ Pending and Anticipated Development and Conservation Plan



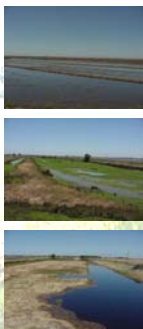
Public Hearing August 6, 2007




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Tiering Concept

- ◆ Broad-based level of detail
  - Emphasizes relative differences among corridor alternatives
- ◆ Key Features
  - Faster
  - Select and preserve corridor
  - Appropriate level of required detail
  - Not as well-known process – public and agencies



Public Hearing August 6, 2007




# PLACER PARKWAY CORRIDOR PRESERVATION

## Planned/Proposed Development

Public Hearing

August 6, 2007




# PLACER PARKWAY CORRIDOR PRESERVATION

## Tier 1 EIS/EIR Process

- ◆ Establish Purpose and Need
- ◆ Develop and Analyze Alternatives
- ◆ Prepare Technical Studies
- ◆ Prepare Tier 1 Draft EIS/EIR
- ◆ Circulate for Public Comment (August 20)
- ◆ Respond to Comments
- ◆ Prepare Final Tier 1 EIS/EIR and Recommend Preferred Corridor Alternative
- ◆ Prepare ROD/NOD

Public Hearing

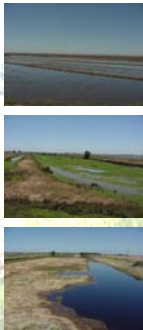
August 6, 2007




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## NEPA/CEQA

- ◆ NEPA
- ◆ CEQA
- ◆ Key Differences
  - Determination of Significance
  - The Environmentally Superior Alternative



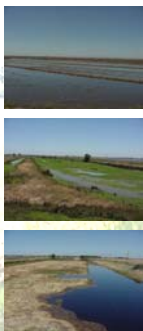
Public Hearing August 6, 2007




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Analysis Framework

- ◆ Draft Tier 1 EIS/EIR Analyzes
  - Corridor selection and acquisition
  - Roadway construction and operations
- ◆ Analysis Conditions
  - Existing
  - 2020
  - 2040
- ◆ Impacts
  - Direct
  - Secondary/indirect
  - Cumulative

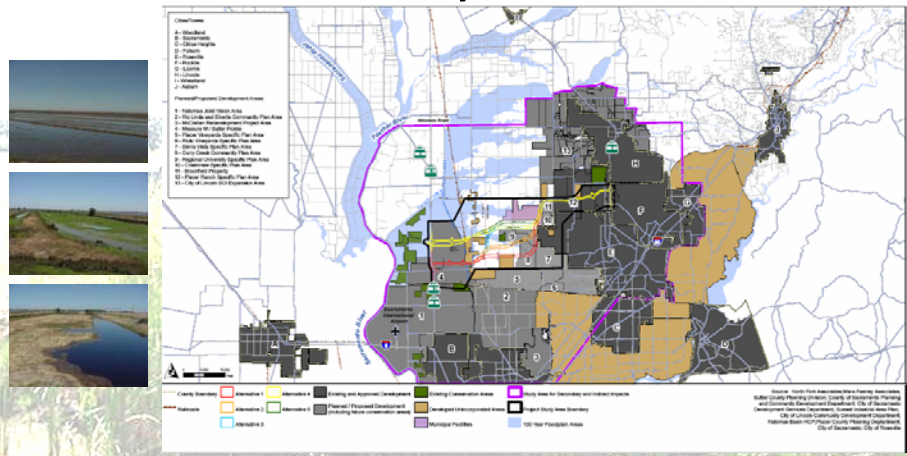


Public Hearing August 6, 2007



# PLACER PARKWAY CORRIDOR PRESERVATION

## Secondary and Indirect Impacts Study Area



**Planning Zones**

- A. Mountain
- B. Mountain
- C. Mountain
- D. Mountain
- E. Mountain
- F. Mountain
- G. Mountain
- H. Mountain
- I. Mountain
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- K. Mountain
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- T. Mountain
- U. Mountain
- V. Mountain
- W. Mountain
- X. Mountain
- Y. Mountain
- Z. Mountain

**Project Areas**

- 1. Highway 99 Water Area
- 2. Highway 99 and State Corridor Plan Area
- 3. Highway 99 and State Corridor Plan Area
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**Other**

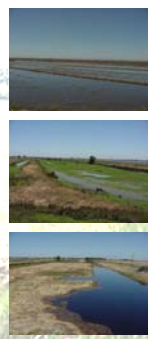
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Public Hearing August 6, 2007




# PLACER PARKWAY CORRIDOR PRESERVATION

## Alternatives Selection Process



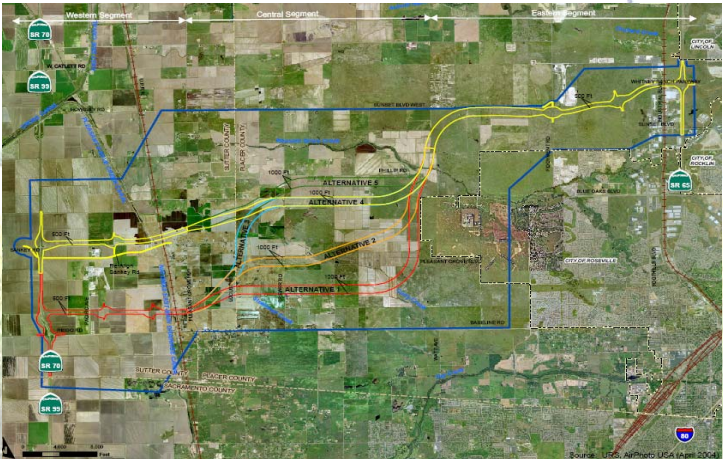
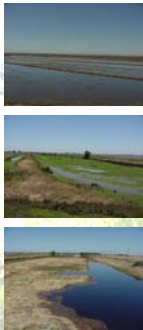
- ◆ Comprehensive technical and public review process
- ◆ Environmental & Transportation Screening
- ◆ Fatal flaws, avoid/minimize impacts & P/N
- ◆ PSR Alternatives, Modified Ones, Avoidance Alternatives, Landowner Alignments
- ◆ Extensive public/agency participation

Public Hearing August 6, 2007



# PLACER PARKWAY CORRIDOR PRESERVATION

## Build Alternatives

Public Hearing

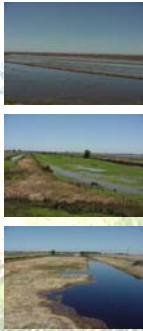
August 6, 2007



# PLACER PARKWAY CORRIDOR PRESERVATION

## Environmental Analysis

- ◆ Land Use
- ◆ Socioeconomics
- ◆ Farmlands
- ◆ Public Services and Utilities
- ◆ Visual Resources
- ◆ Cultural Resources
- ◆ Traffic and Transportation
- ◆ Air Quality
- ◆ Noise
- ◆ Hydrology and Floodplains
- ◆ Water Quality
- ◆ Biological Resources
- ◆ Hazardous Materials



Public Hearing

August 6, 2007



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Environmental Impacts

- ◆ Land Use
- ◆ Farmlands
- ◆ Visual Resources
- ◆ Cultural Resources



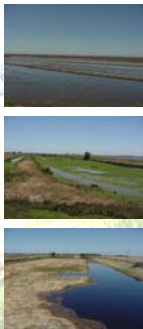
Public Hearing August 6, 2007




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Environmental Impacts

- ◆ Traffic and Transportation
- ◆ Air Quality
- ◆ Noise
- ◆ Biological Resources
- ◆ Growth Inducement



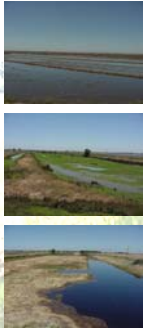
Public Hearing August 6, 2007



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Conclusions

- ◆ Impacts
  - Executive Summary Table
  - Potential Impacts Fall within a Limited Range among the five “Build” Alternatives
- ◆ Environmentally Superior Alternative
  - CEQA - No-Build Alternative
  - Build Alternatives - Alternative 4
- ◆ Preferred Alternative
  - Identify in Final Tier 1 EIS/EIR based on public, jurisdictional and agency comments



Public Hearing August 6, 2007




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## Next Steps

- ◆ Continue NEPA/404 Process
- ◆ Respond to Public Comments on the Draft EIS/EIR
- ◆ Identify Preferred Corridor Alternative
- ◆ Complete Final Tier 1 EIS/EIR
- ◆ Preserve Selected Corridor
- ◆ Start Tier 2 Process

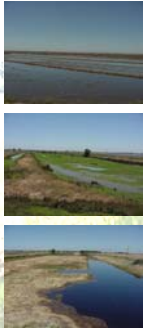


Public Hearing August 6, 2007



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

- There are two ways to ensure your comments on the Draft Tier 1 EIS/EIR are addressed
  - Speak at either of the two public hearings
  - Write or email PCTPA, 299 Nevada Street, Auburn, CA 95603, [pctpa@pctpa.org](mailto:pctpa@pctpa.org)
- If you wish to speak, please fill out a speaker card and give it to the moderator or staff. Speakers will be called in order.
- If you wish to comment, please fill out a comments card and give to the staff or mail to PCTPA
- The comment period ends on Monday, August 20, 2007
- Responses will be prepared to all comments, oral and written, and published in the Final Tier 1 EIS/EIR
- Copies of the Draft Tier 1 EIS/EIR are available at locations listed in the Notice of Availability (at sign-in desk) and also at PCTPA (address above). They can be borrowed or purchased.



Public Hearing August 6, 2007



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

**Thank You  
for  
Participating!**



Public Hearing August 6, 2007





**Appendix B9**  
**Transcript of August 6, 2007 Public Hearing**



PLACER PARKWAY CORRIDOR PRESERVATION PROJECT  
PUBLIC MEETING

VETERANS MEMORIAL COMMUNITY BUILDING

Yuba City, CA

Monday, August 6, 2007

7:00 P.M.

Reported by: JILL R. MCLEOD, CSR #10071  
DIAMOND COURT REPORTERS  
1107 2nd Street, Suite 210  
Sacramento, CA 95814  
(916) 498-9288

DIAMOND COURT REPORTERS (916) 498-9288

1 MR. HILL: Good evening, Ladies and Gentlemen. We are  
2 going to get started with our public hearing, Placer Parkway,  
3 so if you would like to take your seats, we will get underway  
4 momentarily. Please make sure you have signed in at the  
5 door. We do have handout materials that you can take with  
6 you and refer to in the course of tonight's meeting and we  
7 will get underway once we get everybody signed in here.  
8 Thank you.

9 All right. My name is Peter Hill. I'm a member of the  
10 Rocklin City Council and the chairman of the South Placer  
11 Regional Transportation Authority, SPRTA. SPRTA sits over  
12 the cities of South Placer, the City of Lincoln, Rocklin,  
13 Roseville and the County of Placer; and now I would like to  
14 ask each of the authority members to introduce themselves and  
15 tell which jurisdiction they represent. Primo.

16 MR. SANTINI: My name is Primo Santini. I'm a council  
17 member with the City of Lincoln.

18 MR. UHLER: I am Kirk Uhler, member, Board of  
19 Supervisors.

20 MR. GRAY: My name is Jim Gray, mayor of Roseville.

21 MR. HILL: SPRTA's purpose is to coordinate planning,  
22 design, financing and construction of regional transportation  
23 improvements such as the Placer Parkway. The Placer County  
24 Transportation Planning Agency or PCTPA employs all the staff  
25 for the South Placer Regional Transportation Authority.

1           The purpose of this public hearing is to receive  
2    comments on the Placer Parkway Corridor Preservation,  
3    Draft Tier 1, EIS/EIR. And please note, this is a public  
4    hearing. It's an opportunity for the authority members to  
5    hear you. It's not a question and answer period, and neither  
6    the board nor the staff will be responding to questions or  
7    comments.

8           The sole objective is to listen to the comments on the  
9    draft EIR/EIS and we appreciate you being here and value your  
10   comments. Comments may be written or oral and both are  
11   treated the same. All comments received at the public  
12   hearing and within the formal comment period will be recorded  
13   and transcribed and they will become part of the formal  
14   record.

15          Following the comment period, staff will review all  
16   information received and prepare responses to be included in  
17   the final EIS/EIR. If you want to know about future  
18   meetings, be sure to sign in.

19          For written comments, you can either use the form  
20   provided or you can send us a letter. Written comments that  
21   you turn in will become part of the official record and you  
22   can turn comments in today or mail them to us. The address  
23   is on the form. Comments are due by August the 20th, 2007.

24          A court reporter is here and will be recording the  
25   comments tonight, and you are encouraged to make comments on

1 any aspect or any part of the proposed corridor preservation  
2 project and the Draft Tier 1 EIS/EIR.

3 And I would like to now introduce Larry Montna, who's  
4 the vice-chair of the Sutter County Board of Supervisors, who  
5 will make some general comments and remarks about the project  
6 and Sutter County's role in the environmental review process.  
7 Larry.

8 MR. MONTNA: Thank you. I am glad that you came to  
9 beautiful Sutter County tonight to allow the citizens of  
10 Sutter County to tell us, good or bad, whatever way they  
11 happen to feel like.

12 I told you earlier that I liked the parkway thing a lot  
13 better, when I was on the Board 14 years ago, and it started  
14 at Newcastle and ended up about Dixon, to get some of the  
15 traffic out of Sacramento, but whatever we get in here will  
16 sure improve things for the people of your county and our  
17 county both.

18 You know, with the population that has increased,  
19 especially in the Lincoln area, it's going to be detrimental  
20 to anybody trying to get up and down 65, up through there.

21 Again, I would like to thank you for coming to Sutter  
22 County, for our citizens to have input, and hope for the  
23 best, and maybe we can come to a conclusion that we can get  
24 this thing built before long.

25 Thank you, Ladies and Gentlemen.

1 MR. HILL: Thanks, Larry. Now, I would like to  
2 introduce Daniel Iacofano and he will provide some more  
3 information. Go ahead.

4 MR. IACOFANO: Very good. Thank you, Chairman Hill. My  
5 name is Daniel Iacofano and I work with the firm of MIG. We  
6 are consultants to the team that is in charge of preparing  
7 the environmental documentation that you're here to comment  
8 on this evening.

9 My role tonight would be to moderate the session, make  
10 sure we are following proper procedure as is required under  
11 the federal guidelines for conducting this kind of public  
12 hearing for an environmental impact statement draft that has  
13 been prepared and we are very glad to see you here tonight.

14 This is an important part of our process and I can  
15 assure you we take each and every one of your comments very  
16 seriously and it will be added into the record and it will be  
17 part of the record for this environmental document.

18 The agenda, you should have copies of, are on the yellow  
19 paper. We will, after a few brief remarks, provide you an  
20 overview of the Draft Tier 1 EIS/EIR, as we call it,  
21 environmental impact statement, environmental impact review,  
22 so we use those two sets of acronyms, referring to the  
23 federal document and the state document, EIS/EIR,  
24 respectively, so that brief presentation will allow you to  
25 understand the nature of the project, the various



1 alternatives that have been explored and give you information  
2 on what is contained in the EIR as more of a guide to that  
3 document.

4 We will then move right into public comments on the  
5 Draft Tier 1 EIS/EIR and you will have a chance to make your  
6 comments here before the Board members and we will go through  
7 each of the speakers in turn.

8 I will say a little bit more about the procedures here  
9 and also as we get to that part of the agenda, and then the  
10 Board members, SPRTA, will have a few closing remarks. We  
11 hope to conclude by 9 p.m. this evening, and just gauging the  
12 number of people here, we should be well within the time  
13 frame for tonight's meeting.

14 So if you do wish to make a comment here to the Board  
15 and for the official record, we'd ask that you fill out a  
16 speaker card, and you should have a copy of this. If not,  
17 there are plenty of those by the door, and this just asks for  
18 your name and address. We are asking that you limit your  
19 remarks here this evening to three minutes. We are going to  
20 make sure everybody has the exact same amount of time. We  
21 want to make sure that everyone here does have a chance to  
22 speak. If we get a big rush of people at the door, we will  
23 stay as long as necessary to make sure that we have heard  
24 from every person, and we are asking that you be signed up or  
25 registered with your speaker cards submitted by 8:45, so we

1 can be sure to get everybody into the program this evening,  
2 and we will ask that you speak only one time here so that we  
3 can make sure we get done in a timely fashion.

4       It's also possible for you to submit comment cards by  
5 mail or e-mail and we will have information as to how you can  
6 do that up on the slide screen at the end of the  
7 presentation. You can also see information on the documents  
8 there by the door that gives you the address and the e-mail  
9 address locations, if you want to send in any written  
10 comments or more extensive comments than you would like to  
11 make this evening. That is entirely your choice and we are  
12 very happy to receive those written comments in whatever form  
13 you would like to provide them.

14       So that is essentially the agenda for this evening. One  
15 other item of housekeeping, there is a comment card. If for  
16 some reason you want to write out written comments to add to  
17 the record, you may do so with this green comment card. We  
18 will collect those at the end of the session, or if you have  
19 to leave early, then you can send -- you can hand them in to  
20 us before then.

21       Also we are making a complete stenographic record of the  
22 proceedings, as is required, so we have a very accurate  
23 transcription of all the points made here this evening. We  
24 are also tape-recording the session, and again, it's for the  
25 purpose of getting an accurate documentation and record of

1 the meeting, so the stenographer record, the tape-recorder  
2 record will help us do that.

3       So once again, I do thank you very much for attending  
4 the meeting, the public hearing this evening, and I would now  
5 like to introduce the two staff members that are critical in  
6 the preparation of this. One of whom will be speaking to you  
7 before the comments this evening. Celia McAdam, who's the  
8 executive director of the Placer County Transportation  
9 Planning Agency; and Stan Tidman, who will be making a  
10 presentation this evening on an overview of the draft  
11 EIS/EIR. Stan is the project manager for PCTPA and he will  
12 be a resource for you following tonight's meeting, if any  
13 questions should arise or you have any questions following  
14 tonight's meeting that we might be able to answer for you.  
15 But please be aware that, in the course of tonight's meeting,  
16 as Chairman Hill indicated, we are not here to engage in a  
17 dialog or discussion. Unfortunately, our rules of procedure  
18 don't allow for that. This is to receive and obtain from you  
19 comments, questions that then can be taken up and studied in  
20 detail following today's session, so other matters that you  
21 may wish to follow-up on with any of the staff people, you  
22 can do so by calling the agencies that are responsible for  
23 preparing these materials.

24       So with that, let me introduce Stan Tidman, who will  
25 take us through an overview of the Draft Tier 1 EIS/EIR

1 document, and please pay attention here to the screen up  
2 front. Let's see if we can dim the lights. It might make  
3 the screen easier to read, if that is okay in the back, and I  
4 will turn it over to Stan here.

5 MR. TIDMAN: Daniel, thank you very much. Can  
6 everybody hear me with this thing? Again, my name is  
7 Stan Tidman. I work with the Placer County Transportation  
8 Planning Agency, and what I would like to do is quickly, yet  
9 as comprehensively as possible, give you an overview of the  
10 project, a little bit about its background and a little bit  
11 about the Draft Tier 1 EIS/EIR, and I will refer to that  
12 Tier 1 document as a draft, just to try to speed things up,  
13 and then I will finish up with a very brief next step,  
14 basically one slide that will help you understand about what  
15 we hope to do as we finish up the project.

16 From a project background perspective, I think everybody  
17 is aware that the Placer Parkway is a high priority regional  
18 transportation facility that connects State Route 70/99 to  
19 State Route 65.

20 The concept for a parkway began back in, I want to say  
21 1994, with a Placer County General Plan. In its circulation  
22 element, this transportation facility actually shows up as a  
23 plan line. In the late '90's, we started actually working on  
24 some preliminary planning documents. That concept plan was  
25 completed in the year 2000 and a project study report or PSR

1 was concluded in 2001.

2 What both of these documents did was provide a little  
3 bit more detail to the concept of this connector route,  
4 actually outline some very specific goals and policies from  
5 which to measure progress on actually implementing the  
6 project. I have the series of conceptual corridor  
7 alignments. We did a little bit of environmental work and  
8 actually developed some funding strategies of which is  
9 helping to pay for the actual preparation of this document.

10 The need or the problem that we are trying to address is  
11 to carve out or preserve a corridor for a future  
12 right-of-way. In the study area, around the study area, we  
13 have some of the fastest growing communities in the SACOG  
14 region. With that, there is a fair amount of population  
15 growth. SACOG is actually saying that population in western  
16 Placer County and South Sutter County will be doubling  
17 between the years 2000 and 2025, and so with that population  
18 growth comes a fair amount of job growth. With job growth,  
19 there is folks trying to get to and from jobs as well as  
20 moving of goods.

21 The solution or the purpose of the project, again, is to  
22 actually preserve a corridor, and again, you're going to hear  
23 a lot about corridors tonight, so that we can actually then  
24 figure out an alignment for a roadway in the future, so  
25 again, we are just trying to identify a corridor through this

1 environmental review process.

2 We are also hoping to respond to both existing and  
3 anticipated travel, that is the congestion, trying to make  
4 things a little better in Western Placer and South Sutter  
5 Counties, and all of this then will help to provide access to  
6 the Regional Transportation Network that will help support  
7 the planned growth. In other words, the growth that is  
8 identified in the Sutter County general plan as well as the  
9 Placer County general plan as well as then moving goods and  
10 services for projected growth, which we will talk a little  
11 bit more about in just a minute.

12 The players in the environmental review, the Federal  
13 Highway Administration or FHWA is the federal lead. They are  
14 being assisted by CalTrans as we work through this process,  
15 and then as the chair indicated, SPRTA, South Placer County  
16 Regional Transportation Authority is the local project  
17 sponsor, and we are addressing the state requirements.  
18 PCTPA, Placer County Transportation Planning Agency provides  
19 the staffing for SPRTA.

20 The project location -- I am going to have to try to  
21 work this wand here real quick. Let me go back to project  
22 locations. It basically shows the regional perspective here,  
23 the general six city SACOG area. We are here in Yuba City,  
24 Sacramento, Roseville, Rocklin, Lincoln area, State Route 65,  
25 State Route 70/99, I-5, I-80.

1           The shaded area is basically the approximate 55 square  
2 mile project study area, which you can get a better feel for  
3 in this next slide, and again, for orientation purposes, on  
4 the west, State Route 70/99, on the east, State Route 65,  
5 general project boundaries, North and South Baseline and  
6 Riego to the south, Sunset Boulevard West and Howsley here to  
7 the north.

8           Again, in the document, you will see a lot of reference  
9 to three segment areas, the western, central and eastern  
10 segments. In the western segment, from State Route 70/99 to  
11 Pleasant Grove Road, we are looking at a corridor width of  
12 500 feet, and that would be like basically the same here in  
13 the east, generally from Fiddymment, east from State Route 65;  
14 and then in the 7-mile segment between Pleasant Grove and  
15 Fiddymment, we are looking at a 1,000-foot wide corridor, so  
16 it's a barium corridor, 500 feet on either edge and a 1,000  
17 feet in the central area.

18           We are also going to be talking about limited access,  
19 minimizing or avoiding growth inducement, and one of the  
20 underlying principles is this 7-mile segment between Pleasant  
21 Grove Road and Fiddymment where we are not proposing to have  
22 any interchange at all, and again, the hope there is to  
23 maintain a free flow of traffic as well as avoiding any  
24 growth-inducing sort of impacts associated with the parkway,  
25 so that is a little bit about the study area.

1 I should mention that, again, it does take in just a  
2 small sliver of northern Sacramento County here, north of  
3 Riego Road and immediately east of 70/99.

4 Throughout the project, we have had a number of  
5 recurring project challenges. In fact, we had a scoping  
6 meeting in 2003 and a public meeting and a lot of feedback  
7 that we got from property owners asking, "Why has this taken  
8 so long? Why can't you select one?" I think we are getting  
9 closer with this. We are about a year away.

10 Another concept or issue that we have had to deal with,  
11 and I have a separate slide on this, is the tiering process.  
12 This is an environmental review process that will help  
13 streamline large projects, like the Placer Parkway, that have  
14 a number of phases or stages, and again, I have a separate  
15 slide to go into that a little bit more.

16 Again, as we kicked off this project in 2003, there was  
17 a fair amount of skepticism or concern about, again, the  
18 interchange spacing, lack of an interchange and that 7-mile  
19 segment between Pleasant Grove and Fiddymont Road as well as  
20 something called the no development buffer area within that,  
21 where we would be limiting or restricting urban development.

22 We had some selected officials, we had some developer  
23 folks, we had some environmental groups that were very  
24 concerned about the feasibility of actually implementing  
25 these two principles.



1           We went back, worked over the course of a year with  
2 three advisory groups, and basically the direction we got  
3 after that one-year period was to continue to move on. We  
4 did clarify the text in some of the policies to eliminate  
5 some of the ambiguity, but again, the general direction was  
6 to continue on with the project.

7           We have also been doing a fair amount of work with the  
8 federal and state resource agencies. These are groups like  
9 the U.S. Army Corp. of Engineers, USEPA, State Department of  
10 Fish and Game, on addressing various provisions of the Clean  
11 Water Act, and again, these are specifically aquatic resource  
12 concerns, wetlands and things of that nature.

13           Because the project doesn't require any construction,  
14 there is actually no federal permit involved in the project,  
15 but we did want to do our due diligence, so we had early  
16 consultation with these groups, and that first meeting in  
17 August of 2003, I think it was, has now turned into, I think  
18 we have had 16 or 17 meetings. We actually have a formal  
19 modified process that we are working through, to work  
20 together with these groups to actually agree on purpose and  
21 need. That is what we talked a little bit earlier about, by  
22 criteria for selecting alternatives and the range of  
23 alternatives, the ranges that we have talked about today.

24           And then finally, again, I have a separate slide that  
25 addresses some of the concurrent, both planning and urban

1 development proposals that are taking place within the  
2 project vicinity, and immediately around it as it affects the  
3 parkway project.

4 I want to tell you a little bit more about this tiering  
5 concept. Again, as I said, this is a streamlining tool for  
6 large environmental reviews like the Placer Parkway. You are  
7 going -- in the document, you will see a lot of reference to  
8 Tier 1, Tier 2.

9 Tier 1 is the stage we are at right now. We are trying  
10 to do a very broad-based developmental analysis to compare  
11 the relative differences among five alternatives and the  
12 no-build.

13 Contrast that with the Tier 2 or more traditional design  
14 and construction type of project where you're analyzing the  
15 impacts of a specific roadway. Again, that is the subject of  
16 a separate environmental analysis, once the Tier 1 project is  
17 complete.

18 Key features of this tiering project. In our minds, we  
19 felt like this would be the faster way of actually  
20 identifying and selecting a corridor rather than going  
21 through the traditional route adoption, design and then  
22 construction level environmental document.

23 Again, you will see in the next slide, the amount of  
24 urban development that is being proposed in the area, so to  
25 identify that corridor as quickly as possible so we are not

1 precluding any viable alternative from consideration.

2       The flip side of this is a concept that has not been  
3 used, that I know of, very much in Northern California at  
4 this time, so we have had to work quite closely with our  
5 federal partners, with CalTrans as well as some of the  
6 federal resource strategies and the public to kind of  
7 reenforce the idea that that is a general, broad-based level  
8 of review.

9       Again, the proposed and planned development -- I am  
10 going to try to use this wand here again. For orientation,  
11 here on the west, State Route 70/99, on the east, 65, once  
12 again on the south, Baseline and Riego, Sunset Boulevard West  
13 and Howsley here to the north.

14       The red is basically those projects that are either  
15 included in our current plans or being proposed. For  
16 example, back in April, there was actually a scoping meeting  
17 for the proposed Sutter Point specific plan area here. When  
18 you cross the county line into Placer County, there are a  
19 number of specific development proposals in one form or  
20 another. Curry Creek, Sierra Vista, Creek View, Regional  
21 University, Brookfield specific plan, Placer Ranch specific  
22 plan, and even including the comprehensive update that the  
23 City of Lincoln is doing with their general plan.

24       As you know, SACOG has spent a lot of time on its  
25 blueprint project, which is a fair amount of urban

1 development in the south Sutter area, and Placer County is  
2 working on a conservation plan with the resource agency, of  
3 which SPRTA would intend to be a participating agency and  
4 have the parkway as a covered activity, so generally 10 to 15  
5 planning and urban development proposals, all going on at the  
6 same time, all with different objectives, different scopes  
7 and different processes.

8           What a lot of them do have in common is that they are  
9 going to get their approvals before we do. They are going to  
10 be approved before the Tier 1 process is done and certainly  
11 before the subsequent Tier 2 work is done, so that has raised  
12 significant challenges for us to address some of those. We  
13 have actually included a number of developers on one of our  
14 advisory committees, the study advisory committee. We have  
15 shared information with them as well as they with us, and  
16 it's been a good forum to share these concerns.

17           Have we resolved all the issues? No, we haven't, but it  
18 is something that we are working on on a fairly constant  
19 basis.

20           So that gives you a little bit of a background of the  
21 project. Now, I would like to summarize a little bit about  
22 the information that is in the actual draft itself and we do  
23 have copies in the back for you to flip through. We also  
24 have copies of the executive summary, which I think we do a  
25 pretty fair job of giving you the who, what, where, when, why

1 of the project. These are basically the general steps in the  
2 process that we are addressing. We have talked about purpose  
3 and need. We will talk in a minute a little bit about the  
4 alternatives themselves.

5 There are 14 technical reports in the studies that we  
6 completed that actually became the foundation of the draft  
7 document. We prepared the document, circulated it for  
8 review. That, I believe, was July 2nd, when the formal  
9 comment period began, and we are basically at the point now  
10 where we are looking for public comments, so this is about  
11 where we are in the process.

12 Once the comment period is over, we will go back to work  
13 with our consultant group with the federal, state and local  
14 jurisdictions as well as the agencies to kind of process the  
15 information that you're sharing with us tonight. That will  
16 all be wrapped up in the final environmental document as well  
17 as the preferred alternative.

18 Once that is done, we have to perform two administrative  
19 actions. The Federal Highway Administration will complete  
20 the preparation of a Record of Decision and the SPRTA board  
21 will complete a Notice of Determination. Basically what  
22 those two documents do is indicate that we have gone through  
23 the process and complied with the appropriate federal and  
24 state laws.

25 Again, Daniel, I think opened up the session here

1 talking a little bit about NEPA, National Environmental  
2 Policy Act, and CEQA, California Environmental Quality Act.

3 The reason why we are doing the combined document is  
4 basically three reasons. We got federal money to help in the  
5 preparation of the document. We are working very closely  
6 with federal resource agencies on, again, the Clean Water Act  
7 and Endangered Species Act provisions, and by getting a  
8 federal clearance, it always keeps the door open for  
9 potential future funding for design and construction work.  
10 We are not holding our breath on that, but it's certainly  
11 something that could happen.

12 I want to say that there is probably more similarities  
13 between the two laws than differences, but for this project,  
14 there are two, I think, very key differences that we want to  
15 disclose. First, from a NEPA perspective, the law discloses  
16 impact but NEPA does not compel us to categorize those  
17 impacts into any kind of level or degree of significance.

18 CEQA is just the opposite. CEQA does say we have to  
19 disclose and analyze any potential significant impact. CEQA  
20 also requires that we identify the environmental superior  
21 alternative from the analysis framework, and I think this  
22 first bullet and subtopics are key.

23 What the draft actually does is analyze the impacts of  
24 identification and selection and ultimate acquisition of a  
25 corridor, and again, that corridor is that 500-foot to

1 1,000-foot wide corridor between 65 and 70/99.

2 The mound of impact for actually selecting a corridor  
3 and then buying that property or acquiring it is probably not  
4 an awful lot, so what the draft does is it takes it one step  
5 further and analyzes foreseeable general impacts of building  
6 and operating a 4 to 6-lane roadway in each one of the  
7 proposed build alternatives, so I think it's key that we are  
8 not only looking at the corridor selection and acquisition  
9 part of this but we are also trying to do our homework for  
10 Tier 2 and start calling out potential impacts as it's  
11 related to the actual facility itself.

12 We have analyzed this basically in three different time  
13 frames. First, existing conditions, that is the year 2004,  
14 for the purposes of the environmental document. Also from  
15 the year 2020, we have assumed that 2020 opening date, just  
16 for analysis purposes. One of the key assumptions in that  
17 2020 opening year scenario is residential build-out of the  
18 general plans in Sutter County, Placer County, Roseville,  
19 Rocklin, Lincoln. Again, we try to gauge the current level  
20 of environmental review with those general plans. We also  
21 look at a condition, 2040, 20 years after the opening of the  
22 project.

23 This is something the Federal Highway Administration is  
24 very interested in, and one of the key points of that  
25 scenario is also residential development, basically west of

1 Sierra College Boulevard, as it shows in all the current  
2 general plans, plus the majority of those proposed  
3 developments that I just showed you on the slide that had all  
4 the red, South Sutter Point, Placer Ranch, Regional  
5 University. All of those are wrapped up into this 2040  
6 scenario.

7 The draft also analyzes various types of impacts. The  
8 first one, direct impacts, kind of easy. Those are impacts  
9 directly caused by the project, at the same time as the  
10 project and very near the project.

11 I am also going to talk about secondary, indirect  
12 impacts, but cumulative. These are ones that involve two or  
13 more impacts, that when considered together, increase the  
14 severity of an impact on a resource.

15 From a secondary and indirect impact perspective, I want  
16 to show you this map. Secondary and indirect impacts are  
17 ones that are caused by the project. Typically, either later  
18 in time or much further away from the project area, and this  
19 is an example of, again, sorry, it's another different scale  
20 map, but here is generally the 55-mile area, square mile area  
21 of the project study area.

22 For this particular series of impact analysis, which  
23 included growth inducement analysis, we actually expanded the  
24 project area, and again, from generally Sierra College  
25 Boulevard here on the east, I-80, Sacramento River, Feather



1 River all the way up to Nicholas Road and to the proposed New  
2 Spirit Influence, as reflected in the city of Lincoln's plan.  
3 Again, the document, depending on the type of impact, wasn't  
4 confined to analysis just within the study area. In this  
5 case, we went well beyond those project boundaries.

6 A little bit about the alternative selection process.  
7 Again, this is something we worked on from 2003 to 2005. It  
8 involved a very comprehensive, extensive, technical and  
9 public review process that focused on basically environmental  
10 and transportation screening along with ways to avoid any  
11 fatal flaws, something that would likely stop the project.  
12 Again, something we couldn't permit or to avoid or minimize  
13 impacts to specific resource areas and existing development.  
14 All of this, with trying to compare it back to the purpose  
15 and need to make sure we are in the ball park with the  
16 purpose and need.

17 We ran this through a number of steps. We started -- I  
18 mentioned the project study report, or PSR and the conceptual  
19 alignments back from 2001. We ran this thing through, again,  
20 the environmental and transportation screening, again trying  
21 to avoid the impacts on the screen there. We refined these.  
22 We rescreened them. We worked with the local jurisdictions  
23 and public in seeing if there was something we missed. We  
24 actually went through a separate process with the federal and  
25 state resource groups on a series of avoidance alternatives,

1 and basically what they are interested in is seeing -- they  
2 don't want to see a new transportation facility, so we looked  
3 at ways of, could we meet purpose and need without building a  
4 parkway or if we built a shorter parkway? And again, the  
5 document goes into great detail and analysis that we  
6 completed for that.

7 And then toward the end of the process, we actually --  
8 the direction of the SPRTA board went back and looked at  
9 several landowner alignments. One that has become one of the  
10 build alternatives.

11 So again, and I can't emphasize this enough, there was a  
12 fair amount of public as well as agency participation over  
13 this two-year period. I think we had 15 or 16 advisory  
14 committee meetings. We had two environmental scoping  
15 meetings. One down at Pleasant Grove School. We had two  
16 public meetings in 2004. Again, down at Pleasant Grove on  
17 the Sutter side, to develop basically what has now resulted  
18 in five build alternatives; and the draft also will take a  
19 look at the no build, and again, this is, I think, the last  
20 map that I will ask you to jump from one scale to another.

21 It's an aerial, but State Route 70/99 on the west, 65  
22 here on the east, Baseline, Riego to the south and to the  
23 north, Sunset Boulevard West and Howsley. Again, can you see  
24 the three segment areas here? And again, before I jump into  
25 a little more about the alternatives, depending on the

1 segment you are in, you will see these wow-outs here. These  
2 are conceptual interchanges that we have analyzed in the  
3 documents, and depending upon your connection of 70/99 here  
4 at Sankey, we have looked at one right here on the highway.  
5 If you are north of Riego, there could be up to three, and  
6 again, a lot of that will depend upon Sutter County and its  
7 work with the Sutter Point Group as to how these conceptual  
8 interchanges will work.

9       Once again, the 7-mile segment from basically Pleasant  
10 Grove over here to Fiddymment, we are proposing no  
11 interchanges, and again, that is to, again, try to maintain  
12 this high speed facility that will help to minimize  
13 growth-inducing impacts adjacent to the roadway.

14       In the eastern segment, there will be three. One here  
15 at Fiddymment, another at Foothills, and then again  
16 terminating here at State Route 65 adjacent to the City of  
17 Rocklin.

18       I would like to run through the alternatives themselves  
19 very quickly and I will start with the three that basically  
20 connect here north of Riego Road. Alternative 1, the red  
21 alternative is actually the longest distance. It's  
22 approximately 16.2 miles in length. The orange takes a  
23 diagonal run through the better part of the central segment  
24 here before terminating at 65. The blue is this area right  
25 here that follows Locust Road or the Placer/Sutter County

1 line before terminating at 65, and then the two proposed  
2 alternatives here at Sankey, first, the yellow, or Number 4,  
3 and then finally, the last one, Alternative 5, the green.

4 Those are basically the five build alternatives that the  
5 draft environment document analyzes along with the no-build,  
6 and the no-build basically means no parkway.

7 A little bit about the environmental analysis, and I am  
8 not going to get into the 14 specific issues, areas that the  
9 draft addresses, but I put this slide up here indicating --  
10 basically indicating the comprehensiveness of the  
11 environmental analysis. Again, it's a tier level, level of  
12 detail for data collection analysis of those three  
13 conditional years that I talked about, existing, 2020 and  
14 2040 conditions, as well as outlining fairly, I think,  
15 comprehensive series of mitigation strategies.

16 The document basically says that implementing any one of  
17 the five build alternatives will result in some environmental  
18 impacts.

19 I have got nine examples here, and I would like to run  
20 through those just as quick as I can here, to give you an  
21 idea about what some of these are; and beginning with land  
22 use, Alternative 1, you will remember that was the red  
23 alternative, the southernmost build corridor, which would  
24 basically involve converting the most amount of land, and  
25 that is about 1,900 acres, compared with Alternative 4, the

1 yellow alternative, which would have the least impact at  
2 1,600 acres.

3 From a farmland perspective, the red alternative,  
4 Alternative 1, again, would affect the greatest amount of  
5 farmland, converting a 1,000 acres total, compared with  
6 alternative 4, again, the yellow alternative, at about 800  
7 acres. All of the proposed alternatives would change the  
8 visual character of the study area. The draft calls out that  
9 Alternatives 1 and 2, the red and the orange would have the  
10 greatest amount of impacts. Alternatives 4 and 5, yellow and  
11 green, the least.

12 From a cultural resource perspective, each one of those  
13 alternatives would affect the historic resource. That is  
14 Reclamation District 1000. Again, you will remember in the  
15 western district, all five of those build corridors actually  
16 traverse that historic resource.

17 Traffic and transportation, probably the longest section  
18 in the analysis portion of the draft, basically says that all  
19 build alternatives, compared to the no-build -- let me  
20 emphasize. All of the build alternatives will help to reduce  
21 congestion and delay on various arterials and collectives  
22 within the study area.

23 On the flip side of that, all the build alternatives  
24 will affect State Route 70/99 south of its connection point,  
25 whether that's at Sankey Road or north of Riego Road as well

1 as State Route 65, generally between I-80 and the proposed  
2 Lincoln bypass, and again, the project would result in  
3 greater transportation on those two state highways.

4 From an air quality perspective, all five build  
5 alternatives will exceed air quality thresholds. Same holds  
6 for noise. All five build alternatives would exceed federal,  
7 state as well as Placer and Sutter County noise thresholds.

8 Biological resources. All five build alternatives would  
9 have the potential to affect seven special species, special  
10 habitat. Specifically from a pool complex, Alternative 3,  
11 the blue alternative, the one that moved up along the county  
12 line would have involved about 127 acres. Alternative 4,  
13 again, the yellow would affect the least, at about 106; and  
14 the last sample that I have got for impacts has to do with  
15 growth inducement, and again, the draft spends a great deal  
16 of time in dealing with that. Basically what it concludes is  
17 that all five build corridor alternatives would be one of  
18 many factors, and again, I would refer you back to the red  
19 stated development proposal map.

20 The parkway would be one of many factors that would  
21 encourage growth in and near the project study area because  
22 it is actually expanding the regional transportation system.

23 So as you can imagine, if you have had the chance to  
24 take a look at the draft, it makes a lot of conclusions, but  
25 what I would like to do is leave you with three tonight.

1           The first has to do with impact. I mentioned the  
2 executive summary. That is available for your pickup back  
3 there. There is a fairly extensive table in it of 11 x 16  
4 sheets. That basically summarizes all the impacts of all the  
5 build alternatives and the no-build, for existing, 2020, 2040  
6 conditions. If you take a look at it, you will see, for some  
7 resources, there is not a great variation about the number of  
8 impacts. In fact, the ranges are fairly close and I think  
9 that is something that is real important to consider as you  
10 go through the draft.

11           Also, again from the CEQA perspective, the draft  
12 concludes that the no-build alternative is the environmental  
13 superior alternative at this point. And again, that is  
14 probably pretty easy to understand. If you are not building,  
15 if you are not identifying, selecting, acquiring and then  
16 eventually building a roadway, you are not going to have a  
17 lot of impacts, except there would be a major impact on  
18 traffic congestion and delay without the project. It also  
19 would not meet the purpose and need.

20           If you are considering only the build alternatives,  
21 Alternative 4, again, that yellow corridor alternative from  
22 the map winds up being the environmental superior  
23 alternative, and that is primarily because it has the least  
24 amount of impact on biological resources and farmlands; and  
25 then finally, the preferred alternative, and I think we have

1 shared that the preferred alternative, once we have had an  
2 opportunity to go through the comments that you make tonight,  
3 or written, along with a fair amount of consultation with our  
4 federal and regional partners, will actually be called out in  
5 the final Environmental Impact Statement, a report which we  
6 are to have out by this time next summer.

7 So that is a very quick overview of the draft itself.  
8 One slide left. Basically what we are going to be trying to  
9 do over the course of the next year is to continue that NEPA  
10 process that I talked about, continue that with folks from  
11 EPA, Army Corp. of Engineers, the California Department of  
12 Fish and Game. We are going to be looking and trying to  
13 identify what the least environmental damaging report is, as  
14 well as the mitigation strategies that are called out in the  
15 draft. We talked about the comments. With identifying the  
16 preferred corridor, all rolled into the final Tier 1 EIS/EIR  
17 to acquire key pieces of that, starting Tier 2 process, which  
18 again, will analyze the impact of road alignment within that  
19 selected corridor.

20 So Daniel, that is about as quick as I can do and I hope  
21 it made some kind of sense here. Thank you.

22 MR. IACOFANO: Thank you very much, Stan. We are going  
23 to turn the lights back on. Now, we would like to, once  
24 again, review our procedures for the evening. We have a  
25 number of speaker cards turned in. There is still plenty of



1 time for you to turn those in and we will have staff walking  
2 through the aisles, if you do wish to speak and we encourage  
3 you to do so. We just ask that you fill in the card and  
4 follow our 3-minute time limit.

5 We want to mention a few other things. We do have a  
6 public hearing scheduled for this Wednesday night at the  
7 Roseville City Hall, also starting at 7 p.m., so if you know  
8 of neighbors or colleagues or other individuals that are  
9 interested in this project, please let them know. You don't  
10 have to live in that general area. You can attend any one of  
11 these public hearings, so we welcome you to attend that, or  
12 others that you may know that are interested in the project.

13 Back at the table in the back of the room, we have  
14 envelopes, just to make it easier for you to send in written  
15 documents already pre-addressed. You do have to add the  
16 postage. That will go right to our project team for  
17 inclusion in the impact statement and EIR documentation, so  
18 if you do have a desire to submit written comments following  
19 tonight's meeting, you can do so by picking up one of these  
20 envelopes and then the comment cards. There is information  
21 there as to where you can send your comments back in.

22 There is also material in the back. The executive  
23 summary that Stan referred to, there are copies of the  
24 environmental document drafts there for you to look at. They  
25 also exist at various public libraries and those locations

1 are available and listed in the newsletter that we have also  
2 by the door, so again, help yourself to that.

3 So we do have three speaker cards. We would ask that  
4 you come forward here to the lectern and we have the  
5 microphone. We will make a record of your comments and I  
6 will just start with the first speaker here. Ben Field,  
7 Pleasant Grove, and he is to be followed by Leo Trombatore.  
8 So Ben Field? Oh, Bev Field. I'm sorry. We have Denise  
9 keeping time over here just to make sure we are keeping up  
10 with that. Thank you very much.

11 MS. FIELD: I would like to bring your attention to the  
12 word "impact." You spoke a great deal about the word impact.  
13 About 30 years ago, there was a ranch in Pleasant Grove that  
14 was divided for people to buy parcels in that branch, and it  
15 was an old sheep ranch.

16 My family have been shepherders for a long, long while  
17 and we moved to one of the parcels in this ranch and we have  
18 been there since 1975, along with five other families who  
19 moved at the same time and bought the property.

20 As you can notice, I am an elderly lady now, as are all  
21 the other people that moved there. Of those parcels, there  
22 are five hardship parcels in a row between Country Acres and  
23 Brewer Road, and if you choose the red line route, that will  
24 disturb people who have made their lives and developed their  
25 time and their children have come home to build to stay, so

1 that they can stay there.

2 And that is the one comment I would like to make.

3 Impact comes a long way, and I understand the need for the  
4 transportation but understand the need for those of us who  
5 have lived there that long and fought everything, all the  
6 flooding water, everything, and worked to develop our  
7 acreages. It's been our life and you're taking it if you  
8 take that route.

9 MR. HILL: Thank you, Ms. Field.

10 MS. IACOFANO: Very good. Thank you. Leo Trombatore.  
11 Let's go to our next speaker. If you could just state and  
12 spell your name for the record.

13 MR. TROMBATORE: Leo Trombatore, T-r-o-m-b-a-t-o-r-e. I  
14 was the State Director of Transportation under the Deukmejian  
15 administration for five years and I also was the director out  
16 at the Marysville office for 11, and the county for eight  
17 years prior to that. I was transferred here in 1975 and I  
18 live in Yuba City.

19 I want to complement the staff for the excellent work  
20 and presentation that they have made. It's a real tough job  
21 to get anything done these days, but one of the things you  
22 will notice, I have white hair, I am 81 years old. I had 41  
23 years with CalTrans, and many years after that with  
24 consulting engineers, but gentlemen, think big. Don't think  
25 small. We have a tendency to think small. We have a

1 tendency to think that 20 years from now is an eternity. It  
2 isn't. You have to think of a life span.

3 This area is very, very poor in transportation. It  
4 always has been. All of the money that California has has  
5 gone to the metropolitan areas. You have an opportunity to  
6 do something here. I have always thought we should have a  
7 connection with 65 to 99.

8 In 1976-77, I worked with Assemblyman Chappie. We  
9 defined streets and highway codes and it's still there, so  
10 you have some history that you can go to, if you have to.  
11 Albeit, it was down in the Yuba City area, but one of the  
12 things that I think we have got to think about today, since  
13 I've been here now these many years, I've been through two  
14 floods. There is a hell of a lot more people here now than  
15 the first flood and the second flood. This will give you an  
16 opportunity to move people, if you have to, in different  
17 directions. You never know in this flatland where you're  
18 going to have a problem.

19 The last flood we had, we came within that many seconds  
20 of closing every road to Sacramento completely. Yuba City  
21 was blocked off, and I keep telling people, you have to think  
22 about how you're going to handle this. Well, all they think  
23 about is, "Well, we will have a police department handle  
24 that." That is not going to do it. You have got to have  
25 some road space and I think you have a chance to do something

1 here.

2 I think my three minutes are up, so thank you.

3 MR. HILL: Thank you.

4 MR. IACOFANO: Thank you very much. We appreciate that.  
5 George Carpenter is the next speaker and those are the only  
6 cards I have. If anyone does wish to speak, we will take  
7 your cards here and staff have additional cards, so please  
8 feel free. Go ahead, sir.

9 MR. CARPENTER: Thank you. I am George Carpenter.  
10 Mr. Chairman and Directors. I am happy to be here tonight.  
11 I represent the Sutter Point Specific Planned Owners Group  
12 and that is a group of developers that has approximately  
13 6,000 acres of the 7,500 acres, specific planned area in  
14 South Sutter County, and this planning effort is a result of  
15 an advisory measure voted on by Sutter County voters in  
16 November of 2004. It was passed by a 60/40 vote that advised  
17 the Board of Supervisors to plan a misuse community in south  
18 Sutter County, and since that time we have submitted a  
19 general plan and are working on a land plan for about the  
20 last two and a half years in this area.

21 As part of our planning effort, we have always known the  
22 Placer Parkway was a potential, and so in our planning  
23 effort, we have reserved rights of way and we have reflected  
24 the potential for Placer Parkway to come through our planning  
25 area, but we have done so only using the Sankey Road

1 alignment, and that is the alignment that I would urge the  
2 Board of Directors to adopt as part of their Tier 1 proposal,  
3 and in our planning effort, we had to look at what made the  
4 most sense for the location of the Placer Parkway facility,  
5 and it was clear to us that the Sankey Road alignment was the  
6 better alternative.

7       When you look at the environmental review documents,  
8 like Mr. Tidman said, it's the environmentally superior  
9 alternative. It also -- from an environmental standpoint, it  
10 conflicts least with proposed land use plans and that is  
11 least impacted on existing transportation facilities or  
12 planned transportation facilities.

13       Right now we are looking into getting a Riego, 99  
14 interchange built and a Riego Road alignment, which would be,  
15 I think, Alignments 1, 2 and 3. It would probably be  
16 significantly conflicted with the Riego, 99 interchange that  
17 we are working on getting down there now. That is an  
18 existing facility that is needed to help South Placer traffic  
19 get down to Sacramento and Sacramento get to South Placer for  
20 jobs.

21       So with that, I would urge your Board, when looking at  
22 the best environmental alternative, and evaluating the  
23 document, to look at that Alignment 4 or Alignment 5 that  
24 uses Sankey Road.

25       There will be a couple of minor technical issues that we

1 will point out and comment on, but I won't bring those issues  
2 up to you tonight.

3 So thank you.

4 MR. HILL: Thank you, George.

5 MR. IACOFANO: Thank you very much. I don't have any  
6 additional speaker cards, so we are going to start to wrap up  
7 the meeting tonight. We will be here following the official  
8 close of the public hearing, if you wish to meet with staff  
9 or talk to them about any specific questions. At the easels  
10 in the back of the room are the materials back there.

11 I did want to turn it back over to Chairman Peter Hill  
12 of the South Placer Regional Transportation Authority and see  
13 if there are any closing comments here from the chair or from  
14 your colleagues on the Board.

15 MR. HILL: I wanted to make sure there is nobody in the  
16 audience that just has something to say because this is the  
17 last opportunity. Okay then. We will officially close the  
18 public hearing. Do any of the Board members have any  
19 comments?

20 MR. GRAY: I want to thank everybody for coming tonight  
21 and look forward to our next meeting Wednesday night.

22 MR. HILL: Thank you very much for coming.

23 MR. IACOFANO: We look forward to seeing you Wednesday  
24 night. If you would like to attend, that would be 7 o'clock  
25 at the Roseville City Hall. Have a good evening.

1 (The meeting concluded at 8:00 p.m.)

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1 STATE OF CALIFORNIA )  
2 COUNTY OF SACRAMENTO ) ss.

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4 I, JILL R. MCLEOD, a Certified Shorthand Reporter,  
5 License No. 10071, duly certified by the State of California,  
do hereby certify:

6 That the foregoing statement was taken before me at the  
7 time and place first herein set forth;

8 That the foregoing transcript is a true and correct  
9 record of the testimony given by counsel and all proceedings  
10 had at the time and place of examination, as recorded by me  
stenographically, to the best of my ability, and thereafter  
prepared into transcript form via computer-aided  
transcription;

11 I further certify that I am a disinterested person, and  
12 that I am in no way interested in the outcome of said action.

13 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

14

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\_\_\_\_\_  
Certified Shorthand Reporter  
State of California

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**Appendix B10**  
**Transcript of August 8, 2007 Public Hearing**



PLACER PARKWAY CORRIDOR PRESERVATION PROJECT  
PUBLIC MEETING

ROSEVILLE CITY HALL COUNCIL CHAMBERS  
Roseville, CA  
Wednesday, August 8, 2007  
7:00 P.M.

Reported by: JILL R. MCLEOD, CSR #10071  
DIAMOND COURT REPORTERS  
1107 2nd Street, Suite 210  
Sacramento, CA 95814  
(916) 498-9288

DIAMOND COURT REPORTERS (916) 498-9288

1 MR. HILL: All right. I guess we are ready to go and I  
2 want to call the meeting to order. My name is Peter Hill.  
3 I'm a member of the Rocklin City Council and the chairman of  
4 the South Placer Regional Transportation Authority or SPRTA,  
5 and SPRTA member jurisdictions are the cities of Lincoln,  
6 Rocklin, Roseville in Placer County, and I would like to ask  
7 each of the other members of the Authority Board to introduce  
8 themselves starting with Primo.

9 MR. SANTINI: My name is Primo Santini. I am a council  
10 member of the Board of Supervisors, Placer County, and I  
11 would like to thank our host.

12 MR. UHLER: My name is Kirk Uhler, and I am a member of  
13 the Board of Supervisors.

14 MR. GRAY: My name is Jim Gray. I am the mayor of  
15 Roseville.

16 MR. HILL: SPRTA's purpose is to coordinate planning,  
17 design and construction of regional transportation  
18 improvement, such as the Placer Parkway. Placer County  
19 Transportation Planning Agency, or the PCTPA provides  
20 staffing to SPRTA.

21 The purpose of tonight's public hearing is to receive  
22 comments on the Placer Parkway Corridor Preservation Draft,  
23 Tier 1 EIS/EIR; and I want to make a note that this is a  
24 public hearing and it's an opportunity for the authority  
25 members, for us to listen to you. It's not a question and

1 answer period and neither the Board nor the staff will be  
2 responding to questions or comments.

3 The sole objective tonight is to listen to your comments  
4 on the draft EIR/EIS, and I want to turn the meeting now over  
5 to Celia McAdam, who's the executive director of the Placer  
6 County Transportation Planning Agency. She is going to act  
7 as a moderator tonight and she will give you more information  
8 about the procedures that we will have for this meeting.

9 MS. MCADAM: This is on? Okay. Hopefully.

10 MR. HILL: No. It's not on.

11 MS. MCADAM: There we go. Okay. Well, thank you, and  
12 we appreciate everyone coming out here tonight, taking your  
13 valuable time to provide your comments on the Placer Parkway  
14 environmental document.

15 I would like to outline some of the guidelines we are  
16 going by for this hearing, so you know what is going on, what  
17 the plans are, how we are going to handle things as we go on  
18 this evening and throughout the remainder of the  
19 environmental document process.

20 Your comments can be written or oral. Both of them work  
21 equally well and are treated the same and you're encouraged  
22 to make comments about any part of the corridor preservation  
23 proposed project or the draft environmental document. All of  
24 the comments that are received at the public hearing and  
25 within the formal comment period will be recorded and

1 transcribed and they will be part of the formal record, and  
2 then following the comment period, the staff will be  
3 reviewing all of the information that is received from you  
4 folks and from other members of the public and other agencies  
5 and will prepare responses that will be included in the final  
6 environmental document.

7 If you want to know more about future meetings, we  
8 really encourage you to sign in at the sign-in table as you  
9 enter into the lobby.

10 For written comments, you can either use the form  
11 provided, which is the comment card here and we have  
12 self-addressed envelopes out there in the lobby as well for  
13 you to send those in or you can write them out here tonight  
14 and provide them in person or mail them later, whichever  
15 works best for you, or you can simply write a letter. That  
16 works equally well and the address is on the form, and as I  
17 said, we do have the envelopes. Comments are due by August  
18 the 20th. That is the end of the comment period.

19 And also, as we are going into tonight's hearing, we do  
20 have a court reporter here that will be recording your  
21 comments verbatim.

22 Let me briefly introduce the project team. We have Stan  
23 Tidman, who is with SPRTA and PCTPA. He is the project  
24 manager for the Placer Parkway, as well as Denise Hike, who's  
25 part of the consultant team, and then out at the front desk,

1 we have Julie Watson and Cynthia Page.

2 Now, in a minute, we will be hearing from Stan Tidman.  
3 He will be giving a brief presentation and then we will begin  
4 the testimony.

5 Now, in terms of the testimony, we have a couple of  
6 guidelines you need to know about. First of all, if you want  
7 to testify, you need to fill out a blue speaker card. Those  
8 are at the table in the lobby, and then in just a minute,  
9 Julie will be standing at the back of the room. If you  
10 decide midway through the hearing that you want to get up and  
11 testify, you can go ahead and do so and hand that in and I  
12 will be calling people up in order.

13 You have a 3-minute time limit and all speakers that are  
14 registered will be heard, even if it takes the hearing beyond  
15 9 o'clock, so we want to make sure that everyone gets their  
16 chance. Speakers may speak only once and I also just want to  
17 reiterate that you can also provide written comments if you  
18 don't choose to speak here tonight, and those details, as  
19 well as the viability of the comment cards, those details,  
20 how to do that are, there is a board out in the lobby that  
21 gives those details; so with that, I would like to turn it  
22 over to Stan Tidman to start the presentation.

23 MR. TIDMAN: Thank you, Celia. Can everybody hear me?  
24 Okay. Great. I would like to spend just a couple minutes to  
25 do basically three things. First -- and Kevin, if we can get



1 the, I think the third slide up on the screen. While he is  
2 doing that, I will basically give you a brief project  
3 background, talk a little bit about what is in the Tier  
4 Draft 1 EIS/EIR, or as the draft, as I will refer to it, and  
5 a slide about what the project team will be doing over the  
6 course of the next year. Kevin and I are still working on  
7 the system here. I think he has got it here.

8 As everybody is aware, the Placer Parkway project is a  
9 high priority regional transportation facility that is to  
10 connect State Route 70 and 99 to State Route 65. It's a  
11 project that is listed in the Sacramento Area Council of  
12 Governments, or SACOG, Metropolitan Transportation Plan and  
13 we basically have, the problem or need, as it's called out,  
14 is simply this area is one of the fastest growing areas in  
15 the Sacramento region and we will have a lot of resulting  
16 congestion in both western Placer as well as south Sutter  
17 Counties.

18 The solution or the purpose for the project is basically  
19 to preserve a corridor for a future right-of-way and that  
20 right-of-way will eventually help to address both local and  
21 regional transportation congestion as well as provide access  
22 to employment centers that are both planned and in current  
23 general plans as well as projected development in the area.

24 A little bit about the project. The study area, I don't  
25 know about your cursor, if you can follow along, and I will

1 try not to get this in the Board's eyes, but if you see this  
2 area here, this is basically State Route 70/99 on the west,  
3 State Route 65 here on the east, generally, Baseline and  
4 Riego here across to the south, and then to the north, Sunset  
5 Boulevard West and Howsley Road. The Placer/Sutter County  
6 line is in this general area and you will see that the  
7 project area actually takes in a small sliver of northern  
8 Sacramento County.

9 In the draft, you're going to see a fair amount of  
10 references to the three segment areas to the western, here to  
11 the north, the central and then the eastern. In these areas  
12 in the west, we are looking at a 500-foot wide corridor for  
13 the Placer Parkway, from generally, Pleasant Grove Road here  
14 on the west to Fiddymont on the east, a 1,000-foot wide  
15 corridor and then a 500-foot wide corridor to its connection  
16 point at State Route 65.

17 So again, that is an overview of the project area. As  
18 we have worked through the project, and Kevin, next slide, we  
19 have run across five reoccurring or continuing issue areas,  
20 and Kevin, can you actually stream those all up there on the  
21 screen, if you wouldn't mind.

22 The first one is one that we have heard a great deal  
23 about from property owners, particularly in Sutter County,  
24 about what is the range of feasible alternatives? Where are  
25 they and why is it taking so long to identify one? Well, we

1 are getting closer.

2 The second issue area has to do with an environmental  
3 streamlining tool called tiering. You are going to hear a  
4 lot of references to Tier 1 and general developments of  
5 detail; Tier 2, very project level oriented types of detail,  
6 and again, I have a separate slide for that one.

7 The third issue area has to do with two underlying  
8 principles or policies with the Placer Parkway. Access in  
9 that 7-mile segment that I referred to between Pleasant Grove  
10 Road and Fiddymont as well as what is called a no development  
11 buffer zone. The area that is actually outside of the  
12 right-of-way and to the east of the 500-foot or 1,000-foot  
13 corridor. These principles basically have been developed to  
14 try to make sure that the future parkway is a high-speed,  
15 free-flowing facility that will help to minimize growth  
16 adjacent to it.

17 As we kicked off the project back in 2003, there were a  
18 fair number of elected and official developers as well as  
19 environmental groups who were pretty skeptical about these  
20 two policies, so over the course of a year, we worked back  
21 through each of these policies, the background for them, and  
22 a direction that we got from the committees was to basically  
23 continue on to clarify some of the language, particularly  
24 with the no development buffer zone and Tier 2 work, and that  
25 is basically what we have done.

1           The fourth issue area has to do with dealing with  
2 aquatic resource provisions of the Clean Water Act and a fair  
3 amount of work with the U.S. Army Corp. of Engineers, USEPA  
4 and the State Department of Fish and Game.

5           Back in August of 2003, we had an early consultation  
6 meeting with these groups, thought that that would be  
7 basically it, but three, four years later, we have actually  
8 had 16 to 17 meetings dealing with, again, tier-level review  
9 of issues related to aquatic resources. All this work is to  
10 be of benefit to us in later Tier 2 environmental reviews,  
11 and the final challenge that we have been dealing with has to  
12 do with pending as well as anticipated development, and  
13 again, I have a separate slide to talk a little bit about  
14 that.

15           But back to the tiering concept. Again, this is  
16 something that I mentioned as a streamlining tool for  
17 environmental reviews of large infrastructure, like the  
18 Placer Parkway that would have several phases or stages.

19           At the Tier 1 level, where we are right now, we are  
20 dealing with a very broad base level of detail, which is  
21 going to emphasize the relative differences among the five  
22 build corridor alternatives that I will be mentioning here in  
23 just a minute.

24           At the Tier 2, as I have mentioned, we get into much  
25 more specific design and construction-related impacts, and

1 again, later detail.

2 From the parkway's perspective, at Tier 1, what we are  
3 trying to do is identify and select a corridor for future  
4 preservation.

5 Tier 2, as I have mentioned, we are basically going to  
6 be looking at the impacts of identifying a roadway alignment  
7 within that specific corridor. So again, distinction between  
8 general and more specific Tier 2 related types of work.

9 From a planned and proposed development perspective, I  
10 think this is a pretty powerful slide. It basically gives  
11 you an idea about some of the planning as well as urban  
12 development proposals that are either taking place within the  
13 project study area or immediately around it. Again, to the  
14 west, Monday night we were in Yuba City here, just off of  
15 70/99 and the proposed Sutter Point.

16 Moving across the county line, the Placer County Board  
17 of Supervisors just approved the Placer Vineyard specific  
18 plan, and there are any number of other ones, Sierra Vista,  
19 Creek View, Regional University. Sorry, Kevin. I am  
20 probably moving too fast for you. The proposed Placer Ranch  
21 specific plan, and even including the comprehensive City of  
22 Lincoln general plan, weave that in with some of the work  
23 that SACOG has been doing on its blueprint plan as well as  
24 conservation plan, it makes for a very dynamic project and  
25 vicinity area for reviewing proposals.

1 All of these projects have different scopes of work,  
2 processes, schedules. What some of them do have in common is  
3 that they will actually be finished before our Tier 1 work is  
4 completed and the concern there is that we do not, at this  
5 point, want to preclude any viable corridor alternatives with  
6 those development approvals, so we have actually had a number  
7 of different developer representatives on our study advisory  
8 committee to share information as well as to try to  
9 coordinate outstanding issues.

10 That is a very brief overview of what's been going on  
11 from a project background perspective. I would like to move  
12 now quickly into a summary of the actual draft itself.

13 The steps that you see here are the basic ones. The  
14 blue highlighted area is where we are in the process right  
15 now. Celia mentioned that the deadline for receiving  
16 comments on the draft is August the 20th. Once that date  
17 comes and goes, we are going to be actually responding to all  
18 the comments that we have received here at the public  
19 hearings as well as any written ones, considering those,  
20 identifying a preferred alternative in the final EIS/EIR and  
21 do some administrative work and documents that we have  
22 complied with the appropriate federal and state environmental  
23 processes.

24 From an analysis perspective, I have three points that  
25 are fairly important to make. Number 1, the document, as you

1 can imagine, analyzes the impacts of selecting a corridor and  
2 acquiring it, but as you can also guess, there are not an  
3 awful lot of direct impacts to resources by just selecting  
4 and acquiring property; so the draft goes one step further  
5 and actually takes into account reasonably foreseeable  
6 impacts of actually operating, building and operating a four  
7 to six-lane freeway within each one of the proposed corridor  
8 alternatives.

9 We do that for three basic time frames. The first, the  
10 existing conditions or baseline, 2004. 2020, that is the  
11 theoretical, for planning purposes, opening year for the  
12 Placer Parkway and that is based on general plan build-out  
13 for Placer County, Sutter County, City of Roseville, Lincoln,  
14 Rocklin and adjacent jurisdictions; and then the final time  
15 frame that we look at is 2040, 20 years after the theoretical  
16 opening of the Parkway.

17 This is a condition that the Federal Highway  
18 Administration is very interested in. A key assumption is  
19 there is build-out of general applicable plans, plus most of  
20 the development that you see on that proposed development  
21 slide, so we are basically bracketing growth between 2020 to  
22 that 2040, cumulative condition in 2040.

23 And finally, the draft analyzes a fair amount of  
24 different types of impacts, direct, secondary and cumulative,  
25 and for an example, Kevin, the next slide will actually show

1 you that we have not confined our analysis to only that  
2 55-mile, 55-square mile area, the project study area that you  
3 see there outlined in black, but in the case of secondary and  
4 indirect impacts, which include growth inducement. We have  
5 actually moved it out quite a bit, to basically Sierra  
6 College Boulevard here on the east, to I-80 on the southeast  
7 and south, up to the Sacramento River to the Feather River,  
8 Nicholas Road, and then actually to the northern boundary of  
9 the City of Lincoln's proposed New Spirit Influence; so once  
10 again, we haven't confined our analysis -- or the draft does  
11 not confine its analysis to only the project study area.

12 A little bit about the alternative selection process.  
13 Again, I think we have mentioned we started work on this in  
14 2003 and the SPRTA board actually adopted the range of  
15 alternatives in September of 2005, and these are the ones  
16 that are actually evaluated in the draft and these are all  
17 based on a comprehensive, technical and public review  
18 process.

19 We used environmental screening and transportation  
20 screening along with criteria like avoiding fatal flaws,  
21 avoiding and minimizing to resource areas as well as  
22 comparing each one of the potential alternatives to the  
23 project's purpose and need. We did that for a number of  
24 steps.

25 We used a preliminary planning document called the PSR,



1 project study report. We actually identified back in 2001  
2 some very conceptual alignments, ran them, again, through  
3 that screening process. We modified the alignments. We  
4 refined them several times. We worked with the resource  
5 agencies on a series of what we call avoidance alternatives.  
6 How can we meet purpose and need without a new transportation  
7 facility or a shorter one?

8 And then finally, we actually considered several  
9 landowner alignments later on in the process. And again, all  
10 of this was based on a rigorous public as well as agency  
11 public participation program.

12 I think we had actually 15 advisory committee meetings.  
13 We had two environmental public scoping meetings in 2003, two  
14 public meetings in 2004, newsletters and meetings all over  
15 Sutter County as well as Placer County with local agencies.

16 All of that work resulted in the five build alternatives  
17 as well as the draft looks at a no-build, or a project that  
18 would not have the Placer Parkway included in it. And again,  
19 this map may be a little bit hard to see, but again, Kevin,  
20 if you can follow along with me, on the west here, State  
21 Route 70/99, on the east, State Route 65, the southerly  
22 boundary of Baseline and Riego, and then again, to the north,  
23 Sunset Boulevard West and Howsley, the same western, central,  
24 and eastern segments that you saw on the project area map and  
25 all of the build alternatives terminate here at State Route

1 65. There would be a new interchange with a parkway in the  
2 City of Rocklin's Whitney Ranch Parkway.

3 Starting from the west, I would like to run you through  
4 the five build alternatives, and again, the first three  
5 actually begin at an interchange that would be approximately  
6 a half a mile north of Riego Road.

7 The first alternative is the red alternative. It's  
8 actually the longest one, 16.2 miles through this area. The  
9 second -- I will let Kevin catch up. The second one is the  
10 orange alternative, and again, it takes off on a more  
11 diagonal path through the central here before terminating at  
12 65. The blue alternative actually starts off at the  
13 Locust Road alignment. That is the Sutter/Placer County  
14 line, before again sweeping to the north and to the east here  
15 at 65, and then the last two build alternatives would  
16 basically make a connection here at Sankey Road.  
17 Alternative 4 is the yellow. And the last alternative,  
18 Number 5 is the green. It's actually the shortest of the  
19 corridor alignments at 14.2 miles.

20 While we have this map on the wall, I would like to draw  
21 your attention to some of these wow-out areas here. These  
22 are conceptual interchanges that are considered in the draft,  
23 and in the western segment, there would be two. At least  
24 two. One at the state route connection and one here at the  
25 Sutter County area, and up to 3, if you were going to make

1 the connection at the north of Riego connection, from  
2 Fiddymment to, excuse me, from Pleasant Grove to Fiddymment at  
3 the 7-mile segment that I mentioned earlier, no interchanges  
4 are proposed with this Tier 1 proposal. But then there would  
5 be an interchange at Fiddymment, Foothills and again at  
6 Whitney Ranch Parkway.

7 And once again, the draft document does consider the  
8 no-build alternative. The draft is a comprehensive one. It  
9 looks at these 13 environmental issue areas. The work is all  
10 based on a tier level, level of data collection analysis with  
11 the three different time frames that I mentioned, and we  
12 outline a fair amount of mitigation strategies to reduce  
13 potential impacts in all of these areas.

14 The draft concludes that with any one of the build  
15 alternatives, there would be impact to a number of the 13  
16 issue areas that you saw on the previous slide.

17 I have four very brief examples to give you an idea  
18 about, just what the magnitude of some of those are, from a  
19 farmland's perspective. You may remember Alternative 1, the  
20 red one that kind of runs in the southernmost alignment, that  
21 would have the most effect on converting farmland, at about a  
22 1,000 acres. Alternative Number 4, which is the yellow  
23 alternative, would have the least impact at about 800 acres.

24 You can imagine we spent a fair amount of time on  
25 traffic and transportation. All of it would reduce connector

1 routes in and around the project study area. However, none  
2 of these would alleviate traffic congestion during peak hours  
3 on portions of State Route 70/99 and indicated State Route  
4 65.

5 From a biological resources perspective, once again, all  
6 of the build alternatives could affect, potentially affect  
7 seven special status species and their habitat. For example,  
8 Alternative Number 3, the one that had the blue segment that  
9 kind of ran along Locust Road, the county line there, would  
10 affect approximately 127 acres of varietal pool complexes,  
11 while Alternative 4, the yellow one would affect only 106  
12 acres of varietal pools.

13 The draft does spend a fair amount of time on growth  
14 inducement. One would be -- one of several factors, and I  
15 would remind you about the proposed development factors, one  
16 of several factors that would encourage growth primarily  
17 because it would be expanding and improving the Regional  
18 Transportation System, so the draft makes a series of  
19 conclusions, but what I would like to do is leave you with  
20 three, which I think are fairly important ones.

21 The first has to do with impacts, and as you came in  
22 tonight, we do have summaries of what's called the executive  
23 summary. In that, there are several 11 x 17 pages that  
24 summarize the potential environmental effects of all five  
25 build alternatives, plus the no-build, and if you take a look

1 at it, you will see that for some resource areas, there is  
2 not an awful lot of variations. The impacts are fairly  
3 similar, so there is not a wide range of variations, so I  
4 think that is a key.

5 Number 2, from a CEQA perspective, or California  
6 Environmental Quality Act, which requires us to identify an  
7 environmentally superior alternative, the draft concludes  
8 that the no-build alternative is that environmental superior  
9 alternative, but I have two comments on that. That makes  
10 sense, no project, not an awful lot of effects, except that  
11 it wouldn't meet the project purposes and need; and Number 2,  
12 it would result in a significant amount of traffic congestion  
13 and delay, again, within the project area and its vicinity.

14 And then finally, the preferred alternative. We have  
15 talked about this just a little bit. This is something,  
16 again, based on your comments tonight and any written  
17 comments that we get by the 20th, as well as, again, making  
18 our rounds with our federal, state, regional and local  
19 partners, we will actually identify this preferred  
20 alternative in the final EIS/EIR.

21 So lastly, the next steps, what we are going to be doing  
22 over the course of the next year. We have talked about  
23 responding to comments, about identifying the preferred  
24 corridor alternative. We are going to be completing the  
25 Tier 1 EIS/EIR, hopefully by summer of '08, so right around

1 this time next year, we will be back with this final, and  
2 there will be a public final one on the Placer side and one  
3 on the Sutter side, and then we can actually begin to think  
4 about acquiring and preserving a corridor for the Placer  
5 Parkway.

6 Thank you.

7 MS. MCADAM: Thank you, Stan. We would like to start  
8 with the public testimony and the first speaker card that I  
9 have is Don Perera.

10 MR. PERERA: I am going to pass. The couple of  
11 questions I had, he answered them fine.

12 MS. MCADAM: Okay. So then on to Number 2. That was  
13 quick. Olga Widnes.

14 MS. WIDNES: Good evening and thank you. I will be  
15 brief. I just wanted to mention that 11 years ago, my  
16 husband, Claude and I moved here from Marin County. We now  
17 reside at Sunset Roseville. There are about 3,000 plus  
18 homes, a small area. There was nothing around here, and I  
19 mean nothing. The closest store was Albertson's, and I said,  
20 oh, my God. I can't go all the way there for bread and milk,  
21 you know, and look at it today. It's amazing what has  
22 happened in this area. It's wonderful. The growth and all  
23 the stores and everything that we have had, and I think this  
24 Placer Parkway is the answer to everything that we need here.  
25 I think it's a wonderful idea and I wish you the best of luck

1 with it. God speed. Thank you.

2 MS. MCADAM: I actually have no other speaker cards.

3 MR. HILL: We had three in Yuba City. Come on, folks.  
4 Nobody else?

5 MR. GRAY: Somebody get up and say something.

6 MR. HILL: Okay. Going, going. Come on up and speak  
7 and then you can fill the card out after you speak.

8 MR. POLING: My name is Chris Poling and I live at  
9 5530 Sunset Boulevard West, and I am really speaking on  
10 behalf of my wife and neighbor, who took the initiative to  
11 put together some comments for your consideration. It's in  
12 the form of a petition, and essentially what it says, or I  
13 should preface this with saying it may not be within this  
14 scope of Tier 1, but the main point that it's looking at is  
15 the area of the corridor which is outside of the  
16 alternatives, which is east, the section between Fiddymment  
17 Road and Ameruso, (phonetic) the neighborhood there, and what  
18 we are concerned about is the impact of the parkway, how  
19 close it comes to the proximity to our neighborhood, the  
20 Sunset Boulevard and Ameruso community, so I just want to  
21 submit this for your consideration, and I am not sure where  
22 it will fall into this process, but that is essentially it.

23 MS. MCADAM: You can submit those and they will be part  
24 of the record, all written testimony.

25 MR. HILL: Anybody else? Okay. Thank you very much for

1 coming. The public record is closed. Thank you all for  
2 coming.

3 (The record concluded at 7:30 p.m.)

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1 STATE OF CALIFORNIA )  
2 ) ss.  
3 COUNTY OF SACRAMENTO )

4

5 I, JILL R. MCLEOD, a Certified Shorthand Reporter,  
6 License No. 10071, duly certified by the State of California,  
7 do hereby certify:

8 That the foregoing statement was taken before me at the  
9 time and place first herein set forth;

10 That the foregoing transcript is a true and correct  
11 record of the testimony given by counsel and all proceedings  
12 had at the time and place of examination, as recorded by me  
13 stenographically, to the best of my ability, and thereafter  
14 prepared into transcript form via computer-aided  
15 transcription;

16 I further certify that I am a disinterested person, and  
17 that I am in no way interested in the outcome of said action.

18 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

19

20

21 \_\_\_\_\_  
22 Certified Shorthand Reporter  
23 State of California

24

25

**Appendix B1**  
**PowerPoint Presentation – February 2009 Public Hearings**

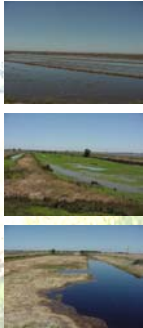




**PLACER PARKWAY**  
CORRIDOR PRESERVATION


## WELCOME

Public Hearing on the Partially Revised  
Draft Tier 1 Environmental Impact  
Statement/Environmental Impact Report



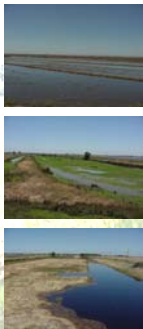
Placer Parkway Corridor Preservation  
Project  
*Yuba City*  
*Feb. 23 – 6:00 p.m.*  
*Auburn*  
*Feb. 25 – 10:45 a.m.*

Public Hearing February 23/25, 2009




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## OVERVIEW



- Project background
- Draft Tier 1 EIS/EIR – 2007
- Partially Revised Draft Tier 1 EIS/EIR – 2009
- Next steps

Public Hearing February 23/25, 2009

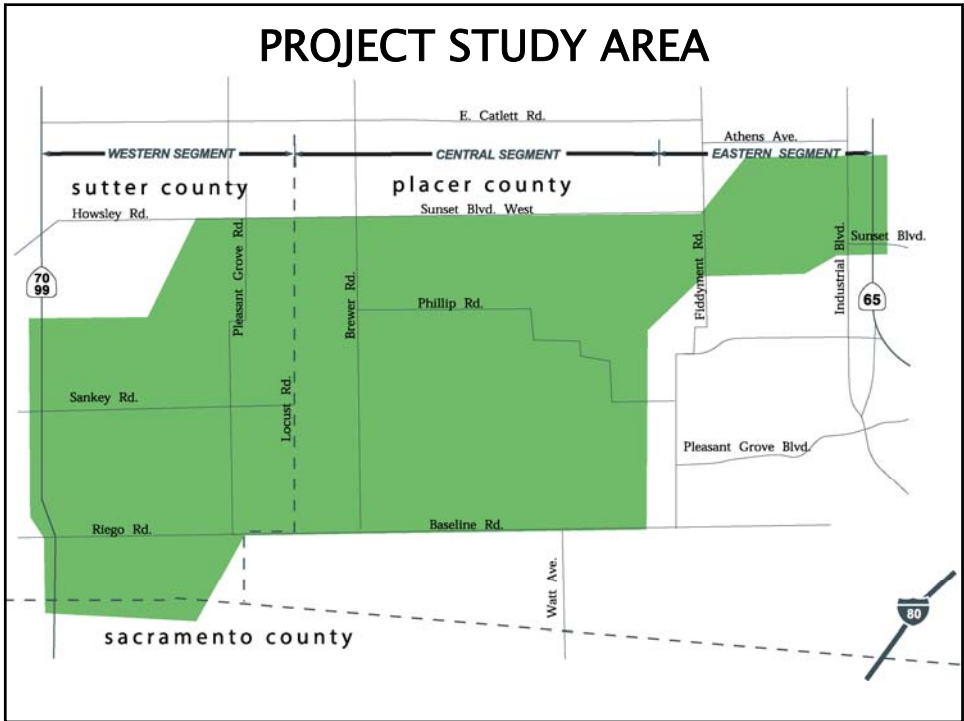



# PLACER PARKWAY CORRIDOR PRESERVATION

## PROJECT BACKGROUND

- High priority regional transportation connection
- Problem (need)
  - Growth and congestion
- Solution (purpose)
  - Preserve ROW for future roadway
- Access & no-development buffer
  - Interchanges
  - No-development

Public Hearing February 23/25, 2009

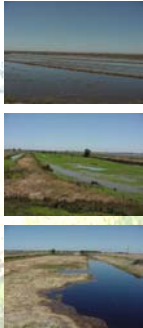





**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## TIER 1 EIS/EIR PROCESS

- Identification of corridor alignment alternatives (2003-2005)
- Completed Draft Tier 1 EIS/EIR (2007)
- Prepared Partially Revised Draft Tier 1 EIS/EIR (2009)
- Prepare Final Tier 1 EIS/EIR, response to comments and recommend preferred corridor alternative (summer 2009)
- Prepare final project approvals



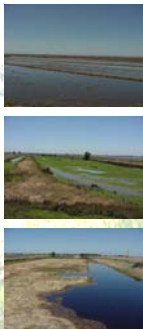
Public Hearing February 23/25, 2009




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## DRAFT TIER 1 EIS/EIR – 2007

- Analyzed no build and 5 build alternatives
- Conclusions
  - Impacts to nine environmental resource areas
  - Some growth inducement potential
  - Alternative 4 least impacts
- Public hearings and review

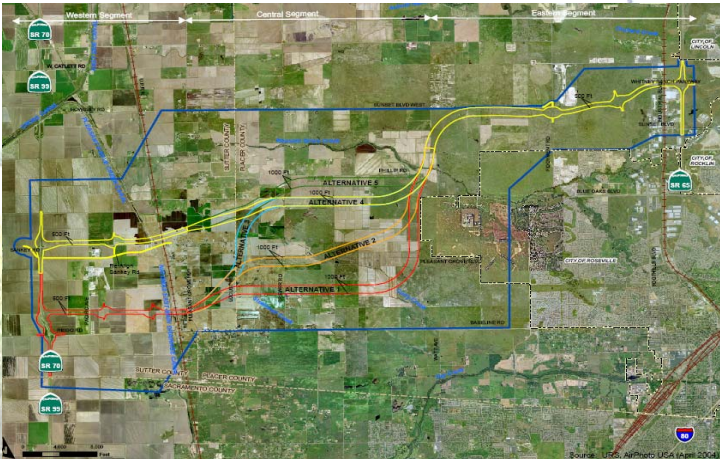
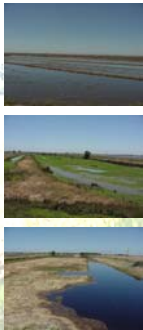


Public Hearing February 23/25, 2009




# PLACER PARKWAY CORRIDOR PRESERVATION

## BUILD ALTERNATIVES

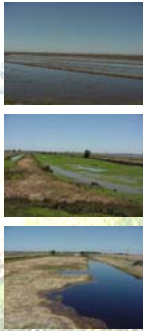
Public Hearing

February 23/25, 2009



# PLACER PARKWAY CORRIDOR PRESERVATION


## PARTIALLY REVISED DRAFT – 2009



- Access & no-development buffer concerns
- SPRTA Board direction
- Comprises:
  - Updates to Draft Tier 1 EIS/EIR
  - Additional analyses

Public Hearing

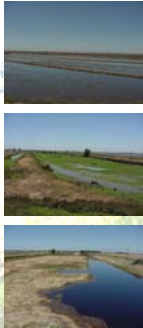
February 23/25, 2009




**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## UPDATES

- Land use and farmland data
- Greenhouse gas analysis
- CEQA evaluation – Environmentally Superior Alternative from Alternative 4 to Alternative 5



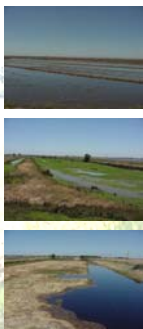
Public Hearing February 23/25, 2009



**PLACER PARKWAY**  
CORRIDOR PRESERVATION


## ADDITIONAL ANALYSES

- Based on hypothetical scenarios
- Assume no guarantee of buffer or access limitations
- Evaluated
  - Growth inducement
  - Secondary and indirect impacts
  - Cumulative impacts



Public Hearing February 23/25, 2009

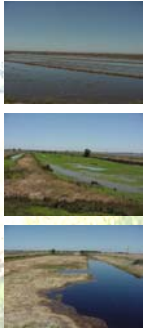





**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## CONCLUSIONS OF ADDITIONAL ANALYSES

- Growth Inducement
  - Alternative 5 – *less potential growth inducement*
  - Traffic impacts – *free-flowing*
- Secondary and Indirect Biological Impacts
  - Alternative 5 – *least potential indirect biological impacts*
  - Alternative 5 – *less potential fragmentation effects*
- Cumulative Biological Impacts
  - Limited effects; *little difference among alternatives*



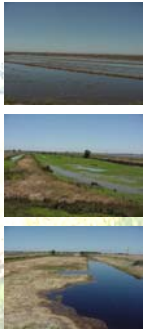
Public Hearing February 23/25, 2009



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

## NEXT STEPS

- Respond to public comments (2007 & 2009)
- Identify the Preferred Alternative
- Continue agency coordination
- Complete Tier 1 EIS/EIR
- Intention to preserve the selected corridor
- Plan for Tier 2 process



Public Hearing February 23/25, 2009




**PLACER PARKWAY**  
CORRIDOR PRESERVATION



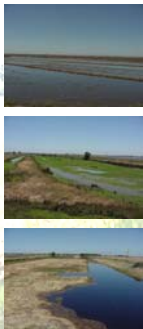
**Thank You  
for  
Participating!**

Public Hearing February 23/25, 2009



**PLACER PARKWAY**  
CORRIDOR PRESERVATION

**FURTHER INFORMATION**



- Contact PCTPA, Celia McAdam, Executive Director, 299 Nevada Street, Auburn, CA 95603,
- Tel: 530.823.4030 or email: [cmcadam@pctpa.net](mailto:cmcadam@pctpa.net)
- Comments are due: March 16, 2009

Public Hearing February 23/25, 2009

**PLACER PARKWAY**  
CORRIDOR PRESERVATION

# Planned/Proposed Development

**Public Hearing** **February 23/25, 2009**

**Appendix B12**  
**Transcript of February 23, 2009 Public Hearing**



BEFORE THE SOUTH PLACER REGIONAL TRANSPORTATION AUTHORITY

ORIGINAL

PUBLIC HEARING

PARTIALLY REVISED DRAFT TIER 1 EIS/EIR

PLACER PARKWAY CORRIDOR PRESERVATION PROJECT

VETERANS MEMORIAL COMMUNITY BUILDING

1425 VETERANS CIRCLE

YUBA CITY, CALIFORNIA

MONDAY, FEBRUARY 23, 2009

6:09 P.M.

REPORTED BY:

KATHRYN SWANK  
CSR 13061

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APPEARANCES

HEARING PANEL MEMBERS:

Kirk Uhler, Chairperson, Placer County Board of Supervisors

Jim Gray, City of Roseville

Peter Hill, City of Rocklin

STAFF:

Celia McAdam, AICP, Executive Director

Stan Tidman, Senior Planner

INTERESTED PERSON PROVIDING COMMENT:

Chris Burke

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1 receive comments on the Parkway Corridor Preservation's  
2 partially revised draft Tier 1 EIS/EIR.

3 Now, we need folks to know that this is a  
4 public hearing. It's an opportunity for SPRTA members  
5 to hear from you. It is not a question-and-answer  
6 period, and neither the board nor staff will be  
7 responding to questions or comments. The sole objective  
8 is to listen to comments on the partially revised draft  
9 EIS/EIR.

10 It's my pleasure at this time to introduce  
11 Sutter County Supervisor from District 5, James  
12 Gallagher, who will make some general remarks about the  
13 project and Sutter County's role.

14 MR. GALLAGHER: Thank you, Chairman Uhler. And  
15 I would just like to start off, first of all, by  
16 welcoming the SPRTA Board here to Sutter County in  
17 beautiful Yuba City. And we're very happy to have you,  
18 and thank you for coming up to our area to allow for  
19 some public comment from the people in this area.

20 Sutter County as, you know, recognizes the  
21 importance of improving our regional circulation and  
22 transit, and Placer Parkway being one of those such  
23 projects, and we recognize that it's a high priority  
24 regional transportation project which will connect State  
25 Route 70 and 99 in south Sutter County through our

1 proposed Sutter Pointe Specific Plan Area, if it is  
2 approved -- we're in the process of considering that  
3 proposal as we speak -- and connecting that area to  
4 State Route 65 in west Placer County.

5           And we also acknowledge the importance of this  
6 environmental process as we move forward. As you also  
7 know, the Sutter County Board of Supervisors has  
8 expressed support for Alternative 5, the Sankey Road  
9 alternative, as being the LEDPA. And as I know, your  
10 board is also supporting that alternative. But we were  
11 also open to comment from the public and as we move  
12 forward in this environmental review process.

13           So again, I would just like to thank you for  
14 coming up here to Sutter County and we're looking  
15 forward to hearing comment from the public.

16           Thank you again for your time.

17           CHAIRPERSON UHLER: Great. Thank you for being  
18 here.

19           Again, we want to remind folks that they are  
20 encouraged to make comments on any aspect of the  
21 partially revised draft Tier 1 EIS/EIR. All comments  
22 that are received at public hearings, both this one and  
23 one that will be held in Auburn on Wednesday, all  
24 comments within these hearings, within the formal  
25 comment period, will be recorded and transcribed, hence

1 the young lady typing away furiously over here. And  
2 they will become part of the formal record.

3           Following the comment period, staff will review  
4 all the information received and prepare responses to be  
5 included in the final EIS/EIR.

6           If you are interested in learning about future  
7 meetings as a part of this process, you are encouraged  
8 to sign in, in the back. For written comments, either  
9 use the form provided or provide a letter. You can turn  
10 the written comments in today if you are that speedy, or  
11 you may mail them in; the address is on the form.  
12 Comments are due by March 16th of 2009. And as I  
13 mentioned, we do have a court reporter here to record  
14 your comments.

15           At this point I would like to introduce our  
16 project team, beginning with Celia McAdam and Stan  
17 Tidman, both of PCTPA/SPRTA staff. And I will let you  
18 introduce some of our support staff and consultants.

19           EXECUTIVE DIRECTOR McADAM: Yes. We have  
20 Denise Heick, who's the project manager for URS  
21 Corporation; and Julie Watson, who is part of the  
22 project team as well; and we also have Lisa Wilson here  
23 from Sutter County, who's been working with us on the  
24 technical side.

25           CHAIRPERSON UHLER: Great. And in just a

1 moment, Stan Tidman is going to provide a brief  
2 presentation and then we will begin the testimony.  
3 We're going to conduct a hearing in an orderly fashion,  
4 make sure that everyone gets a chance to speak.

5           If you would like to provide testimony, we ask  
6 that you fill out a speaker card, hand it to Mr. Tidman,  
7 who will call people in order. We are asking that you  
8 respect a three-minute time limit for speakers. All  
9 speakers who have registered will be heard, but you must  
10 hand in the card by 7:45. Based on the audience, I  
11 don't think that's going to be a problem, and you are  
12 only allowed to speak once. The public can submit  
13 comments via comment cards, e-mail, or mail; details on  
14 how to do this are provided on the comment cards.

15           And so Stan, at this point, I will turn it over  
16 to you for our summary.

17           SENIOR PLANNER TIDMAN: I'm going to try to  
18 talk without the aid of a microphone. Can you all hear  
19 me?

20           CHAIRPERSON UHLER: Does that work for the  
21 court reporter?

22           THE REPORTER: I'd prefer that he use the  
23 microphone.

24           (An overhead presentation was presented.)

25           SENIOR PLANNER TIDMAN: So here we go. I would

1 like to basically recap the first two points -- a little  
2 bit about the Placer Parkway and its background and then  
3 briefly do some highlights from the Draft Tier 1 EIS/EIR  
4 that was released back in the summer of 2007, give you  
5 some highlights on the partially revised draft that's  
6 basically the subject of tonight's meeting, and then  
7 share with you what we think are going to be some of the  
8 next steps to actually finish the project.

9           From a project background, I think most  
10 everybody is pretty familiar with the proposed Placer  
11 Parkway. It's a high priority long-range regional  
12 transportation planning project that's supposed to  
13 connect State Route 70 and 99, here in south Sutter  
14 County, with State Route 65 in the vicinity of Rocklin  
15 and Roseville.

16           The problem, or the need, related for the  
17 project is related to growth -- very simply, more  
18 people, more jobs, creating more congestion on our  
19 highways.

20           The solution or the purpose of the project is  
21 to basically preserve a corridor for the future roadway  
22 that would basically help to reduce this congestion by  
23 improving the regional transportation network as well as  
24 advancing economic goals in south Sutter and west  
25 Placer. So that's kind of a quick who, what, where,

1 why, when.

2           Tonight we're going to hear an awful lot about  
3 access and no-development buffer. These are basically  
4 two fundamental underlying objectives of the parkway.  
5 They were brought out several years ago in some of the  
6 preliminary planning projects for the parkway, and they  
7 basically have to do with limiting access or creating  
8 new interchanges within a 7-mile segment between  
9 Pleasant Grove Road, here in Sutter County, and  
10 Fiddymont, on the Placer County side; and the second is  
11 actually creating a no-development buffer area along  
12 both sides of the roadway to basically enhance -- or  
13 limit development and enhance the parkway-like character  
14 of the parkway.

15           Both of these particular components are also to  
16 help reduce potential growth inducement, and that's  
17 something that a lot of folks seem to be interested in,  
18 with this project.

19           A little bit about the study area -- and I hope  
20 this guy works. On the west, here in Sutter County,  
21 this is State Route 70/99. On the east, State Route 65,  
22 again, in the Roseville and Rocklin area; general  
23 boundaries on the north, Howsley Road here with Sunset  
24 Boulevard; west as you move into Placer County; and,  
25 again, generally to the south here, we're looking at

1 Riego Road as it changes into Baseline here in Placer  
2 County.

3           You will hear us talk a lot about Riego Road,  
4 Sankey Road, Pleasant Grove Road, here in north-south,  
5 and Fiddymment as we move through the presentation. And  
6 I think most everybody will remember that the project  
7 area has been divided up into three segments -- the  
8 west -- and again, I apologize for this thing not doing  
9 what it's supposed to. But here on the west and the  
10 east, we're looking at identifying and preserving a  
11 corridor that's going to be 500 feet wide. And then in  
12 the middle area here, again, from Pleasant Grove Road  
13 over to Fiddymment, a thousand-foot-wide corridor area.

14           Now, a little bit about the environmental  
15 process itself. First, two general points. First, we  
16 are working to complete a document that combines both  
17 federal and state environmental regulations. Second,  
18 again, you see a lot of the word "tier" on our work. We  
19 are using a tiered approach to try to complete this  
20 project. The Tier 1 is using basically general  
21 information to complete our data collection and  
22 analysis. The key to this Tier 1 process is trying to  
23 identify and preserve a corridor in the face of a great  
24 deal of both planned and proposed development in south  
25 Sutter as well as western Placer County.



1           Then moving into the Tier 2 process, that would  
2 actually be the construction-level document where we  
3 would be analyzing the impacts of various roadway  
4 alignments within the selected corridor. Again, the key  
5 to this tiering process is streamlining. And hopefully,  
6 the work that we're going now in Tier 1 will facilitate  
7 later 2 Tier work for the construction process itself.

8           We basically completed these three items. It  
9 took us two years through a lot of public outreach and  
10 technical reviews to identify the five build  
11 alternatives that we'll be talking about here in just a  
12 minute.

13           In 2007, I think most of you will remember, we  
14 got the draft Tier 1 EIS/EIR out for review, and again,  
15 just this last month, we got the partially revised draft  
16 out, and, again, that's the subject of tonight's  
17 meeting.

18           The last two things that we're proposing to do  
19 in the process, once the public comment period closes on  
20 March the 16th, for the partially revised draft, we will  
21 be completing the final environmental impact statement  
22 and impact report. We're anticipating that that will be  
23 done by this summer, the summer of 2009. And again,  
24 once we've cleared our federal and state clearances and  
25 environmental clearances, we can work with local

1 jurisdictions actually to preserve the selected  
2 corridor.

3 A little bit now about the actual '07 draft, as  
4 it went out in the summer of 2007. Again, this is  
5 something that we looked at -- the impacts related to  
6 not only the selection and acquisition of a corridor,  
7 but also some conceptual impacts as they related to the  
8 actual construction of the roadway and its operation.

9 We did this for several different time  
10 frames -- an existing time frame, which I believe was  
11 2004, and then the years 2020 and 2040. We looked at  
12 these from 13 different environmental issue areas, and,  
13 again, basically evaluated impacts related to direct,  
14 indirect, as well as cumulative impacts.

15 The conclusions that we came up with, from,  
16 again, the '07 draft were that the Placer Parkway would  
17 result in impacts to 9 of those 13 environmental issue  
18 areas.

19 We also did quite a bit of work on growth  
20 inducement. Again, I think in past meetings, you've had  
21 heard us talk a great deal about the work that we're  
22 doing with federal resource agencies on, particularly,  
23 aquatic resources, secondary and indirect impacts --  
24 growth has been a key concern. One of the primary  
25 conclusions of the '07 draft was that the parkway would

1 be growth inducing. Two qualifications to that would be  
2 that growth would be very limited, and there's very  
3 little difference among the five build alternatives as  
4 to that potential growth inducement.

5 As part of the CEQA evaluation of the  
6 '07 draft, of the five build alternatives, Alternative  
7 No. 4, which is the second northern-most alternative,  
8 was basically identified at that time as the least  
9 environmentally -- or, excuse me, the environmentally  
10 superior alternative.

11 Once again, in August, 2007, we held public  
12 hearings in this room and then in the city of Roseville  
13 to take comments on the draft. We got, I want to say,  
14 50 letters and public comments that we're basically  
15 working on, to respond to those comments.

16 And one more map. This is -- thank you, Julie.  
17 This is an air photo of the study area, a little bit  
18 harder to see, but, again, for orientation purposes, if  
19 I can get this guy to work. Again, this is State Route  
20 70/99 here on the west; State Route 65 here on the east;  
21 Howsley/Sunset to the north -- and again I apologize for  
22 this not working -- Riego and Baseline to the south.  
23 The three segments, west, central and east. The first  
24 three alternatives, or the three southern alternatives  
25 all begin here on State Route 70/99 about a half a mile

1 north of Riego. Again, the No. 1, red; No. 2, orange;  
2 No. 3, blue; all 15 to 16 miles long. The two northerly  
3 alternatives, Alternatives 4 and 5, the yellow and  
4 green, about 14 miles in length.

5 All five of the corridors, you can see, have a  
6 common alignment in this area, and all terminate at  
7 State Route 65, at what will be the future Whitney Ranch  
8 Parkway Interchange.

9 And once again, the '07 draft basically looked  
10 at up to five -- excuse me, six interchanges; two or  
11 three here in the west, none in the central area -- and  
12 again, that goes back to that underlying project  
13 provision of no new interchanges within this 7-mile  
14 segment -- and then three here in the east, the last one  
15 linking up here at State Route 65. So that's a bit of a  
16 background.

17 Now, the point of tonight's meeting, a little  
18 bit about the actual partially revised draft, again,  
19 this was done primarily at the direction of the SPRTA  
20 Board. I think it was this time last year we held a  
21 public workshop in Auburn with the board to go over some  
22 of the concerns that we received on the '07 draft. A  
23 number of these related to, again, the access and  
24 no-development buffer concerns and the fact that the  
25 SPRTA board has no land use authority so that the board,

1 as well as the Federal Highway Administration, couldn't  
2 be put in a position of actually guaranteeing that there  
3 would be no new interchanges or that there might not be  
4 adjustments to that no-development buffer area that we  
5 just talked about.

6           So back in -- I think it was at the end of the  
7 March, the board directed the staff to put together  
8 several analyses with hypothetical scenarios that would  
9 add additional interchanges into this analysis as well  
10 as eliminate the no-development buffer. And again, they  
11 asked us to do that, to circulate the draft for public  
12 comment, and they did it basically for two reasons:  
13 Number 1, they felt it would be the best way to disclose  
14 those hypothetical impacts, again, with additional  
15 interchanges and the elimination a of no-development  
16 buffer; and Number 2, they thought that it would also  
17 provide a stronger foundation for the future Tier 2  
18 work, again, the construction level document.

19           So the partially revised draft actually  
20 consists of two parts: First, kind of an administrative  
21 update. There have been some data changes since the  
22 release of the '07 draft. And I will talk to that in  
23 just a minute. And then the second part of this  
24 actually gets into the additional analyses with those  
25 hypothetical scenarios.

1           So first, very quickly, the draft, again, one  
2 of the key pieces of data that was included in the  
3 '07 draft had to do with farmland mapping data, and that  
4 mapping data had changed since, again, the release of  
5 summer '07, and so the partially revised draft reflects  
6 that new information and actually makes a change from  
7 one of the conclusions from the '07 draft. The impacts  
8 to farmland now -- the least amount of impacts to  
9 farmland has moved from Alternative No. 4 to No. 5, so  
10 with the updated data, we've basically changed the  
11 conclusion that Alternative 5 actually has the fewer  
12 impacts to farmland data.

13           Greenhouse gases; this is something, again,  
14 that's a big issue with the state here. There have been  
15 a number of regulations that have been implemented since  
16 the '07 draft was released. The update addresses  
17 emissions and their effect on transportation planning.

18           And then finally, again, you will remember in  
19 my brief on the '07 draft, the CEQA evaluation in  
20 '07 identified of the five build alternatives, that  
21 Alternative 4 was the environmentally superior  
22 alternative. Again, based on that change in farmland  
23 mapping data, the partially released draft reflects that  
24 the environmental superior alternative is now  
25 Alternative 5 versus 4.

1           The second part, again, of the partially  
2 revised draft has to do with the initial analyses that,  
3 again, are based on the hypothetical assumptions --  
4 again, additional interchanges and eliminating the  
5 no-development buffer area.

6           And basically what we did was look at three  
7 sets of analyses:

8           The first had to do with reviewing some of the  
9 growth work that -- growth inducement work that we had  
10 done in the '07 draft, and this actually included a new  
11 traffic analysis.

12           The second set of analyses had to do with  
13 secondary and indirect impacts, specifically as they  
14 related to biological resources and, again, all rolled  
15 up in that issue of growth.

16           And then finally we took another look at the  
17 cumulative impacts that we have discussed in the  
18 '07 draft and, again, with the idea of trying to  
19 determine what, if any, differentiation we could make  
20 among the alternatives, specifically as they related to  
21 wetlands and vernal pools.

22           And before moving from this slide, I would just  
23 like to point out two things: First, that these  
24 analyses were completed basically to determine whether  
25 or not there were any significant differences among the

1 alternatives as they related to secondary and indirect  
2 impacts. And No. 2, this set of analysis, they are  
3 hypothetical. They are not actually a part of the  
4 project description. In fact, we've actually packaged  
5 all this up so it's an appendix in the partially revised  
6 draft to further emphasize the fact that these are  
7 hypothetical and not part of the actual project  
8 description.

9           So what did we find with all this work? First,  
10 generally, these three separate analyses reinforced the  
11 conclusions on growth that were identified in the  
12 '07 draft and that basically is, Placer Parkway would be  
13 growth inducing. The growth that we would be inducing  
14 would be very limited, with very little difference among  
15 the five build alternatives. With the actual growth  
16 inducement analysis, we determined that Alternative No.  
17 5 would have the least amount of potentially developable  
18 land around it and, therefore, it would be the least  
19 growth inducing of the five alternatives.

20           I mentioned the fact that we had gone through  
21 and did another traffic analysis. Again, we wove in at  
22 least three to four additional interchanges into the  
23 system, and what we found is, is that traffic volumes,  
24 like you would think, or interchanges, would increase  
25 traffic volumes, but the key for this project is that



1 all five alternatives would still -- or continue to  
2 operate at level of service D, or LOS D, or better, and  
3 that ensures the project need component of maintaining  
4 that free flow, and that's something that's a key to the  
5 parkway.

6           Again, from a secondary and indirect biological  
7 impacts, and again, this is strictly related to growth,  
8 we came to the same conclusion. Again, Alternative 5  
9 being the least growth inducing. We also felt that it  
10 would be -- have the least effect on fragmenting any  
11 biological resources' habitat.

12           And then finally from a cumulative impacts  
13 effect, again, reinforce the '07 draft and,  
14 specifically, that our contribution, the parkway's  
15 contribution, to these cumulative impacts would actually  
16 be less than 1 percent among all the alternatives for  
17 wetlands and for vernal pool complexes.

18           So that basically was the primary set of  
19 conclusions from the revised draft.

20           From a next-steps perspective, again, I  
21 mentioned the fact that we would like to have the final  
22 Tier 1 EIS/EIR completed by this summer, the summer of  
23 '09. To do that, we will be preparing responses to  
24 comments to not only the ones that we received in 2007  
25 on the original draft, but also the partially revised

1 draft.

2 In that document, we will identify the  
3 preferred alternative and, again, as we're doing all  
4 this, we are hoping to continue work with our federal  
5 partners on resource conservation aspects.

6 Once the final EIS/EIR is completed, we will  
7 then work with local jurisdictions, again, through a  
8 series of general plan amendments to provide a policy  
9 framework to preserve the selected corridor. And once  
10 that's done, we will actually begin planning on the Tier  
11 2 process.

12 So that in a nutshell is a little bit about the  
13 project, the process, and what's in the harshly revised  
14 draft. And was mentioned earlier, please remember that  
15 we were doing a second public hearing Wednesday morning,  
16 10:45 a.m. at the Placer County Board of Supervisors  
17 Hearing Chambers, "The Domes," at 175 Fulweiler Street.

18 Thank you.

19 CHAIRPERSON UHLER: Thank you. All right.

20 This is the time where we will open up the  
21 public hearing for public comment. And again, a  
22 reminder that during this process, as much as we may  
23 want to, our board is not here to answer questions or  
24 respond to comments, but simply to take public  
25 testimony. It may be submitted in writing, if you

1 prefer. But we're here to give you the opportunity to  
2 present your comments tonight. We do have forms that  
3 you can fill out. Really the, purpose of doing is that  
4 we do have this information correct for our record. So  
5 that's why we are asking you to fill out speaker cards.

6 But if anybody is interested in presenting at  
7 this point, this is the time.

8 I see a dozen and a half people, here and  
9 nobody wants to make a comment?

10 MEMBER HILL: Come on up.

11 CHAIRPERSON UHLER: If you want to go ahead and  
12 make your comment first and then just submit some  
13 information, so we have your name for the record and  
14 contact information, because we need to be able to  
15 respond to the comments that are issued. That's all.

16 So at this point, just give your name and  
17 address, that will be good enough for now.

18 MR. BURKE: My name is Chris Burke, 6623 Locust  
19 Road, Pleasant Grove.

20 I just came from a meeting about the rezoning  
21 in south Sutter County; couldn't hear hardly anything.  
22 But did I hear you say that your conclusion is that  
23 Route 5 or No. 5 is the better route, or Route 4?

24 CHAIRPERSON UHLER: Do you want to go ahead and  
25 answer the question, since it's not an opinion? It's

1 simply restating. Because you heard both. You heard  
2 the 2007 analysis that had Alternative 4, and then the  
3 revised analysis shows Alternative 5.

4 SENIOR PLANNER TIDMAN: And that's correct.  
5 And again, if you can't hear me, please let me know. Is  
6 that on now? Can you hear that?

7 MR. BURKE: Yeah.

8 SENIOR PLANNER TIDMAN: And again, it's  
9 something that we've talked about from the parkway's  
10 perspective, for a number of years. But we can't, or  
11 will not, be making a firm recommendation or actually  
12 identifying a preferred alternative until the  
13 environmental work is complete.

14 So again, when the final environmental impact  
15 statement and report is done, we will actually identify  
16 which of the corridor alternatives is that preferred  
17 alternative.

18 As Supervisor Uhler just mentioned, in the  
19 earlier draft -- and again, I apologize for the  
20 complication here, but we're looking at federal as well  
21 as state regulations. From the state's regulations,  
22 we're required to identify an environmentally superior  
23 alternative. In 2007, we identified that as Alternative  
24 No. 4. That's the second most northerly one of the five  
25 build alternatives. Based on the partially revised

1 draft that we just talked about tonight, because of the  
2 change in farmland mapping, we have changed that  
3 conclusion to be Alternative No. 5, which is the  
4 northern-most of the five build alternatives. But once  
5 again, that's the state-related part of this thing.

6 The final environmental document will actually  
7 call out that preferred alternative specifically.

8 Does that kind of answer your question?

9 MR. BURKE: It kind of does.

10 But I was just at a board of supervisors  
11 meeting in Sutter County. And I couldn't hear very  
12 well, but I was understanding that they were assuming 4  
13 was the route.

14 SENIOR PLANNER TIDMAN: And up until this  
15 partially revised draft, they were right in step with  
16 the '07 draft, but, once again, the newer mapping  
17 information has changed that conclusion to No. 5. But  
18 again, officially, that won't be decided upon until the  
19 final environmental document is completed.

20 MR. BURKE: And that will be?

21 SENIOR PLANNER TIDMAN: We're hoping this  
22 summer, summer of 2009.

23 CHAIRPERSON UHLER: Sir, did you have any other  
24 comments?

25 MR. BURKE: Oh. Well, it just -- well, I was

1 just trying to track down here who's thinking -- Sutter  
2 County and Placer County and whatever it is, because  
3 it's been going on forever, you know. And it's getting  
4 down to the same meeting, talking about the same thing,  
5 over and over and over again.

6 And that's -- I guess until this summer, I  
7 guess we won't know. Okay. Thank you.

8 CHAIRPERSON UHLER: Thank you very much.  
9 Anyone else have any comments? Going once, twice.

10 And at this point, members have any comments to  
11 add?

12 Then we will go ahead and close the public  
13 hearing. Thank you for your participation this evening.

14 And a reminder that we will -- the comment  
15 period is open until the close of business on Monday,  
16 the 16th of March. So comments that you might not  
17 wanted to have made here publicly, you can certainly  
18 submit in writing to our staff. All information on how  
19 to do so is in back. Thank you very much for being here  
20 this evening.

21 (The public hearing adjourned at 6:41 p.m.)

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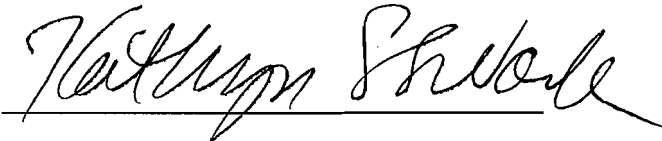
CERTIFICATE OF REPORTER

I, KATHRYN S. SWANK, a Certified Shorthand Reporter of the State of California, do hereby certify:

That I am a disinterested person herein; that the foregoing public hearing was reported in shorthand by me, Kathryn S. Swank, a Certified Shorthand Reporter of the State of California, and thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for any of the parties to said meeting nor in any way interested in the outcome of said meeting.

IN WITNESS WHEREOF, I have hereunto set my hand this 2nd day of March, 2009.



KATHRYN S. SWANK, CSR, RPR  
Certified Shorthand Reporter  
License No. 13061

**Appendix B13**  
**Transcript of February 25, 2009 Public Hearing**





BEFORE THE SOUTH PLACER REGIONAL TRANSPORTATION AUTHORITY

ORIGINAL

ITEM F. PUBLIC HEARING

PARTIALLY REVISED DRAFT TIER 1 EIS/EIR

PLACER PARKWAY CORRIDOR PRESERVATION PROJECT

BOARD OF SUPERVISORS CHAMBERS

175 FULWEILER AVENUE

AUBURN, CALIFORNIA

WEDNESDAY, FEBRUARY 25, 2009

10:49 A.M.

REPORTED BY:

KATHRYN SWANK  
CSR 13061

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APPEARANCES

HEARING PANEL MEMBERS:

Kirk Uhler, Chairperson, Placer County Board of Supervisors

Jim Gray, City of Roseville

Peter Hill, City of Rocklin

Linda Stackpoole, City of Lincoln

STAFF:

Celia McAdam, AICP, Executive Director

Stan Tidman, Senior Planner

INTERESTED PERSONS PROVIDING COMMENT:

Chris Burke

Robert Harmoney

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II. Public Comments on the Partially Revised Draft Tier 1 EIS/EIR	17
III. Close Hearing	21
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1 little bit about what they feel will be the next steps  
2 on the project.

3 From a background perspective, I think the  
4 Board is very familiar that the Placer Parkway is a  
5 long-range high priority transportation facility that's  
6 planned to connect State Route 70/99 in south Sutter  
7 County State Route 65 near Rocklin and Roseville.

8 The project would basically be addressing a  
9 need that deals primarily with growth, and that's  
10 population growth as well as employment growth, and the  
11 resulting congestion that's created. The way that we  
12 feel like we can fix this is by preserving a corridor  
13 for a future roadway that will, in the future, reduce  
14 congestion on the both local as well as regional  
15 transportation network, as well as advance economic  
16 development goals in south Sutter as well as west  
17 Placer.

18 As we talked about last Monday night, there are  
19 two project provisions of the parkway project. They are  
20 actually included in our project description. They deal  
21 with access and no-development buffers. From an access  
22 perspective, you are all familiar that we are proposing  
23 no new interchanges within a 7-mile segment between  
24 Pleasant Grove Road on the Sutter side of the project  
25 area and Fiddymont in Placer County; and secondly,

1 creating a no-development buffer along the roadway.

2           These are two fundamental underlying provisions  
3 that were identified in previously completed Placer  
4 Parkway planning documents and have been carried through  
5 into the project's ultimate description. The objectives  
6 of these two provisions are, one, basically to maintain  
7 a free-flowing traffic condition on the parkway once  
8 it's built, and through the year 2040; to try to  
9 integrate more parkway-like components along the  
10 roadway; and then, finally, to try to reduce inducing  
11 future growth along the parkway.

12           A little bit about the study area. You will  
13 remember it's about 55 square miles in area, and, I  
14 think, with the cursor here -- can you all see that on  
15 the screen here? It's better than my laser pen last  
16 Monday night.

17           Here on the west, State Route 70/99 in Sutter  
18 County; on the east, State Route 65 in the Roseville and  
19 Rocklin area; generally, the southerly boundary of the  
20 study area is Riego Road and then transitioning to  
21 Baseline as we get into Placer County; and then across  
22 the north, Howsley Road in Sutter, and Sunset Boulevard  
23 West. You will hear us talk a little bit about, again,  
24 Riego Road, Sankey Road, Pleasant Grove Road, running  
25 north-south here as well as Fiddymont, as we go through

1 the presentation.

2           The last point on the study area -- you will  
3 remember that it was divided into basically three  
4 segments, a west, central, and east. We are looking to  
5 preserve a 500-foot-wide corridor in the west as well as  
6 the eastern segment, and, again, a thousand-foot-wide  
7 corridor from Pleasant Grove Road to Fiddymont.

8           A couple points about the environmental process  
9 as we've been through it, first two introductory points.  
10 You remember that we are working to prepare a combined  
11 document that addresses both federal as well as state  
12 environmental regulations.

13           Second, we are using a tiered approach. You  
14 will hear an awful lot about Tier 1, Tier 2. We are at  
15 the Tier 1 stage right now, where we hope to use very  
16 general background data as well as analyses to identify  
17 and select a corridor as soon as we possibly can,  
18 because of the rapidly developing nature of the project  
19 vicinity as well as the surrounding area.

20           The Tier 2 work will actually be the  
21 construction-level document where we will be analyzing  
22 various roadway alignments within the selected corridor.  
23 The idea or the concept behind tiering is to try to  
24 streamline that Tier 2 work as we're in the construction  
25 document, relying on a lot of the information that we've



1 developed for Tier 2 -- excuse me, in Tier 1.

2           These first three points have been completed.

3 Again, you will remember that the five build  
4 alternatives were identified after an extensive public  
5 outreach program as well as a number of technical  
6 analyses. We actually released the Draft Tier EIS/EIR  
7 in the summer of 2007 for comment. And as you are  
8 aware, last month, we circulated the partially revised  
9 draft for public comment.

10           We have two steps left -- completing the final  
11 Tier 1 EIS/EIR. We're hoping to have that done by this  
12 summer, the summer of 2009. And then we will actually  
13 be completing the environmental clearances and project  
14 approvals for the project.

15           I would like to make just a couple of brief  
16 points about the '07 draft, the one that we got out in  
17 June of 2007. You will remember it along with the five  
18 build alternatives. It also considers a no-project or  
19 no-build alternative. We basically did this for two  
20 scenarios. One, looking at actually identifying and  
21 acquiring a corridor, which was easy to do, but then  
22 also tried to identify those impacts on actual roadway  
23 construction and operation as best we could, again,  
24 realizing that we're at a Tier 1 stage.

25           This was done for three different time

1 frames -- existing, year 2020 and year 2040, analyzing  
2 impacts related to direct, secondary and indirect as  
3 well as cumulative impacts.

4           We made a number of conclusions with the  
5 '07 draft. The first that -- of the 13 environmental  
6 issue areas that we looked at, the parkway would wind up  
7 impacting at least nine of those. From a secondary and  
8 indirect impact perspective, you all know we were very  
9 concerned about the parkway's potential to induce  
10 growth. A major conclusion of the '07 draft is, is that  
11 the parkway will influence growth to some extent, and  
12 that's primarily because it would be one of many factors  
13 not only within the project vicinity but also the  
14 project area that would be contributing to growth. The  
15 parkway is specifically improving the regional  
16 transportation system and influencing the timing of  
17 development around the interchanges that have been  
18 analyzed for the project.

19           And then finally, from a CEQA -- again, that's  
20 the state's environmental guidelines perspective, the  
21 '07 draft identified Alternative 4 -- that's the yellow  
22 alternative, the second most northern one -- as the one  
23 that would be the environmentally superior alternative.

24           The board is familiar that we conducted two  
25 public hearings in August of 2007, in Yuba City and then

1 in Roseville. We received about 50 letters and public  
2 hearing comments on the '07 draft.

3           Again, we've done a fair amount of talking  
4 about the build alternatives. This is an aerial view of  
5 the five build alternatives, and, again, just to kind of  
6 reorient you to the map here, if I can wake up my  
7 cursor. Here we are at the west at State Route 70/99 in  
8 Sutter County; the east, State Route 65; again, across  
9 the south here, Riego and Baseline Road; and then north,  
10 Howsley and Sunset Boulevard West. Again Riego, Sankey,  
11 Pleasant Grove Road, again, north-south here, and then  
12 Fiddymment.

13           The three southerly alternatives -- one, two,  
14 and three -- all begin here in Sutter County, at State  
15 Route 70/99 about half a mile north of the existing  
16 intersection with Riego Road. The red alternative,  
17 Alternative 1, is a little over 16 miles, and the  
18 longest of the five build alternatives. The orange and  
19 the blue, Alternatives 2 and 3 are about 15 and a half  
20 miles each; the two northerly alternatives would  
21 actually begin here at Sankey, at State Route 70/99; the  
22 yellow and the green both at just over 14 miles. In  
23 fact, the green alternative, Alternative No. 5, is  
24 14.2 miles, I think, and actually the shortest of the  
25 five build alternatives.

1           You will remember that there is a common  
2 alignment for the alternatives, basically beginning here  
3 at the creek crossing at Pleasant Grove Creek and then  
4 terminating here at State Route 65, at what would be the  
5 future Whitney Ranch Parkway.

6           The '07 draft did analyze up to six  
7 interchanges along the various alternatives. Here in  
8 the western segment, again, three for Alternative 1  
9 through 3; two for Alternatives 4 and 5; none in the  
10 middle -- again, that goes back to that access provision  
11 where we're proposing no new interchanges within this  
12 7-mile segment; and then three here on the eastern  
13 segment, again, terminating at State Route 65. So  
14 that's a little bit of background for you.

15           What we're here today to talk about is the  
16 actual '09 partially revised draft. And with this  
17 document, we basically undertook it at primarily the  
18 direction of this board, and it was based primarily on  
19 the fact that we had received a number of comment  
20 letters on the '07 draft that related, again, back to  
21 those project description provisions of access and  
22 no-development.

23           The specific concerns from a number of the  
24 commenters was that this Board, the SPRTA Board, has no  
25 land use authority, and that we could not guarantee that

1 in the future, proposals by others, not necessarily by  
2 us, could result in additional interchanges or adjusting  
3 or eliminating the actual no-development buffer area.

4 So to try to allay that concern, the board  
5 directed us to circulate a series of scenarios that are  
6 based on hypothetical interchanges being added to,  
7 primarily, that middle area, that 7-mile segment and  
8 actually eliminating the no-development buffer area.

9 And so the partially revised draft consists of  
10 basically two parts: A series of more administrative  
11 types of updates. Information has changed since the  
12 release of the '07 draft. And then finally, the  
13 additional analyses based on those hypothetical  
14 scenarios.

15 From the updates perspective, again, we did  
16 find that there were some changes in data from the --  
17 '07 to this time frame. Probably the most important was  
18 a change in farmland mapping data, and a key difference  
19 between the '07 draft as well to the partially revised  
20 draft is, is that we found that the alternative with the  
21 least farmland impacts changed from Alternative No. 4 in  
22 '07 to Alternative 5 in the partially revised draft, and  
23 that's a key, key change.

24 The partially revised draft also addresses a  
25 number of greenhouse gas regulations that had been put

1 into effect since 2007. These rely or focus primarily  
2 on emissions and transportation planning.

3 And then the final thing that I think is  
4 important with the revised draft is, it changed the  
5 environmentally superior alternative conclusion from  
6 No. 4 to No. 5, and that was based primarily, again,  
7 back to the update on farmland mapping data, so that's  
8 just a quick summary of the updated information in the  
9 partially revised draft.

10 The additional analyses, again, based on the  
11 hypothetical interchange and elimination of the buffer  
12 area comprises the second part of the partially revised  
13 draft. And for this, we actually went back and did  
14 three separate analyses, first, based on providing  
15 additional information on potential growth inducement,  
16 which also included a new traffic analysis. We spent a  
17 fair amount of time looking at biological resources as  
18 they relate to growth and then finally we took another  
19 look at cumulative impacts specifically to see what if  
20 any differences in these hypothetical scenarios would  
21 result among the alternatives, primarily to aquatic  
22 resources, wetlands, and vernal pools.

23 There are two points that I need to cover  
24 before I move on from this slide. The first is, is that  
25 we did these analyses primarily to determine whether

1 these hypothetical scenarios would result in any  
2 significant changes or differences among the  
3 alternatives, again, primarily to secondary and indirect  
4 impacts.

5           The second point is, is that none of this work  
6 was intended to replace the growth work that we had done  
7 in the '07 draft. This was primarily done to address  
8 these hypothetical scenarios and, in fact, you will find  
9 that as you go through the document, we put all of this  
10 work in a separate appendix just to try to separate it  
11 out from the body of the environmental document.

12           So what we learned from all of this is, first,  
13 the additional work confirms, supported, the growth  
14 evaluation that was completed in the '07 draft, that the  
15 Placer Parkway would have some influence on growth in  
16 the area. Again, it reinforced the fact that this  
17 growth would be very limited and that there would not be  
18 much difference among the alternatives from a growth  
19 perspective.

20           The specific individual analyses. The growth  
21 inducement was based on determining what we call  
22 potentially developable land around each one of the  
23 alternatives. We found that Alternative 5, again, the  
24 one that's the northernmost and the shortest of the  
25 alternatives, would wind up with the fewest amount of

1 acres of potentially developable land around it.

2 I mentioned that we did another traffic impact  
3 analysis, and that was basically to try to leave in the  
4 fact that we were looking at three to four new  
5 hypothetical interchanges. They did, in fact, change  
6 the analysis. Higher traffic volumes would result on  
7 all five of the build alternatives as well as of these  
8 hypothetical interchanges. But the key is, is that we  
9 would still be operating any one of the five build  
10 alternatives at a level of service, or LOS, D or better.  
11 And this was a key of the project's purpose and need in  
12 attempting to maintain that free flowing condition on  
13 the future parkway.

14 As far as biological impacts -- and again,  
15 those biological impacts that were specifically related  
16 to growth -- we found that, again, Alternative 5 having  
17 the least potential for growth would wind up having the  
18 least potential to actually fragment any of the  
19 biological habitat in the study area.

20 And then finally from a cumulative perspective,  
21 again, we reinforced what we found in the  
22 '07 document -- did clarify the fact that there would  
23 be -- we would be contributing to cumulative impacts,  
24 but, again, at a very small, small rate. In fact, for  
25 impacts to vernal pools and wetlands, there would



1 actually be less than 1 percent difference among the  
2 five build alternatives. So that's a very quick summary  
3 of what is in and what we found with the partially  
4 revised draft.

5           Where we hope to be in the future. Again, we  
6 want to complete the Final Tier 1 EIS/EIR. To do that,  
7 we will be preparing responses to comments to not only  
8 comments that we received in 2007, but the middle of the  
9 this next month with the partially revised draft. The  
10 final will identify the preferred alternative. As we're  
11 doing this, we're proposing to continue our work with  
12 the federal regulatory agencies and the effects on  
13 aquatic resources.

14           Once the document is actually done, we've got  
15 our environmental clearances. We would then be working  
16 with the individual local jurisdictions on the series of  
17 general plan amendments to create policies that would  
18 wind up preserving the selected corridor, and then  
19 actually starting to plan work for the Tier 2 process.

20           That, in a nutshell, is kind of where we've  
21 been, where we are, and where we hope to be.

22           Thank you.

23           CHAIRPERSON UHLER: Thank you, Stan.

24           Any questions from board members or staff?

25           No?

1 All right. At this point, we'll go ahead and  
2 open the public comment portion of this. Has anybody  
3 submitted any request cards to you?

4 SENIOR PLANNER TIDMAN: I haven't seen any.

5 CHAIRPERSON UHLER: Is there anybody here that  
6 wants to address the item, go ahead and please step up  
7 to the microphone and state your name and address,  
8 please.

9 Sir, you indicated you wanted to speak. This  
10 is the time.

11 MR. BURKE: Yes, I'm back. My name is Chris  
12 Burke. Pleasant Grove, Locust Road, 6623.

13 After the meeting the other night in Yuba City,  
14 I talked to my supervisor.

15 My questions were, why are you guys imposing a  
16 thousand-foot right-of-way through my property instead  
17 of a five hundred.

18 Secondly, why is Sankey Road being disturbed,  
19 instead of going north of Sankey Road, similar to what  
20 you were doing on Riego Road?

21 While I was at this Sutter meeting there, at  
22 the board of supervisors, they have problems with their  
23 development on the Sankey Gap, which contributes to  
24 flooding, which is a direct result of Placer County.  
25 They need a conveyance water down Sankey Road, or

1 alongside Sankey Road, down to their ditch, which they  
2 plan on expanding. Now, that was one of their options,  
3 to mitigate. Because in '86, their mitigation ponds  
4 that they have allocated or identified, they filled up  
5 in a matter of minutes in '86. When they plugged Sankey  
6 Gap, they breached those levees and those people had to  
7 walk out in 4 feet of water. They were flooded within a  
8 half hour, the same height as the East Canal. So that's  
9 another concern.

10 And you're impacting with people's property  
11 with that realignment. I know of three or four of us  
12 that do not want that realignment on our property, and  
13 we have not been asked. And that was -- just till a  
14 month or so, that's the first realignment phase I have  
15 ever seen of that, doing that.

16 The other question is, you plan on -- if I am  
17 correct on hearing at the last meeting, Riego Road would  
18 be built out to six lanes, to 70, and now you are going  
19 to put six more lanes over to 70 and 99? That is a  
20 four-lane road. I won't get on that road until after  
21 10 o'clock in the morning as it is, because the traffic  
22 is at a crawl at Riego Road. I don't understand --  
23 first phase ought to be to improve 70/99 to handle your  
24 traffic that you plan on putting on.

25 I think there's a little more thought here that

1 needs to be thought out, myself. And I don't know what  
2 the time frame overall -- if you are talking five years,  
3 ten years, or whatever. But kind of like you are  
4 getting the cart before the horse on this problem of 70  
5 and 99. And then realigning Sankey Road, then you have  
6 a problem with the drainage that everybody on the east  
7 side of that east levee drain canal is impacted greatly.  
8 Their property values are diminished because of the  
9 flooding. That's -- I think I have said what I need to  
10 say.

11 CHAIRPERSON UHLER: Thank you for your comment,  
12 sir. If anything happens -- they are being recorded.  
13 But if you would also like to submit your comments in  
14 the form of a letter, that will be welcomed.

15 MR. BURKE: I have.

16 CHAIRPERSON UHLER: Perfect. Thank you very  
17 much.

18 MR. BURKE: Thank you.

19 CHAIRPERSON UHLER: Anybody else?

20 MR. HARMONEY: Yes. My name is Robert Harmoney  
21 and I live at 3238 -- 5205 South Brewer Road. And my  
22 concern is, our property is a quarter of a mile wide,  
23 1320 feet, and if you take a thousand -- and it's a mile  
24 deep. If you take a thousand foot away from me, it's  
25 going to leave me 320 feet wide by 5,280 feet long.

1 That's not going to be of much value as far as farming,  
2 and we do raise cattle.

3 The other concern I have is that currently,  
4 there's very little maintenance done along the roadways  
5 out in that area. The roads are very rough, a lot of  
6 potholes.

7 If we have a thousand foot of buffer zone,  
8 who's going to take care of it? What's it going to do  
9 for the grass, the weeds, the seeds, the fire hazard  
10 that is going to be a problem to the farmers and  
11 residents in those areas.

12 The decision -- you know, we don't know if  
13 there's going to be cloverleaves, if we're going to be  
14 dumping a lot of traffic onto the county roads that are  
15 out there now. But with the addition of this  
16 thoroughfare, whether it's going to be considerable more  
17 traffic. And, you know, us farmers, we have to get our  
18 equipment from one field to the next, and currently it's  
19 done on the county road.

20 And if we have more traffic -- well, currently,  
21 it's very difficult because we get out there and move  
22 something, why, we can't hardly -- we don't have enough  
23 time to get off the road before the people want to get  
24 around us. You know, they take some, you know, really  
25 unnecessary risks to get past us, and they are very

1 unhappy with us.

2           So if we have additional traffic, boy, that's  
3 going to be a real problem for us.

4           And I do thank you for your consideration, and  
5 thank you.

6           CHAIRPERSON UHLER: Thank you for your input.

7           Anybody else? All right.

8           Seeing none, any members of the board have any  
9 comments for staff?

10           Okay. We'll go ahead and close the public  
11 hearing, but I want to remind folks that the public  
12 comment period doesn't close until the end of business  
13 on Monday the 16th of March. So please, we encourage  
14 you to submit your comments to our staff. Submittal  
15 mechanism information is in the back.

16           And with that, I don't believe any action is  
17 required of our board at this point, so we will go ahead  
18 and move on to our next agenda item, Item G.

19           (The public hearing adjourned at 11:15 a.m.)  
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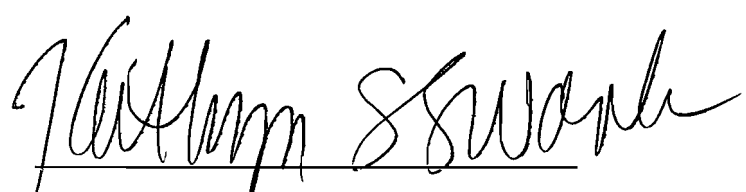
CERTIFICATE OF REPORTER

I, KATHRYN S. SWANK, a Certified Shorthand Reporter of the State of California, do hereby certify:

That I am a disinterested person herein; that the foregoing public hearing was reported in shorthand by me, Kathryn S. Swank, a Certified Shorthand Reporter of the State of California, and thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for any of the parties to said hearing nor in any way interested in the outcome of said hearing.

IN WITNESS WHEREOF, I have hereunto set my hand this 2nd day of March, 2009.



KATHRYN S. SWANK, CSR, RPR  
Certified Shorthand Reporter  
License No. 13061

**Appendix B14**  
**PCTPA Website Information**





**The following information is an extract from the PCTPA website as of Summer 2009. Please see [pctpa.net](http://pctpa.net) and select the Placer Parkway link for additional information.**

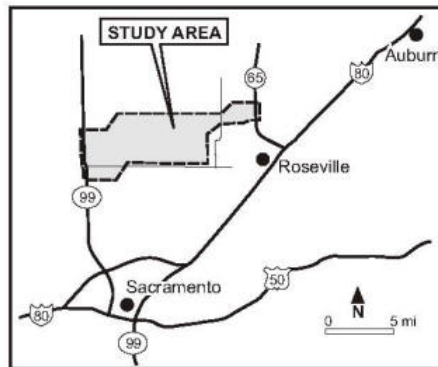




- ▶ Project Description
- ▶ Corridor Alternatives
- ▶ Environmental Review
- ▶ Funding
- ▶ Public Outreach
- ▶ Project Schedule
- ▶ Project Library
- ▶ Who to Contact

## Welcome to the Placer Parkway Corridor Preservation Project!

*The Placer Parkway is to be an approximate 15-mile long, high-speed transportation facility, which will connect State Route (SR) 65 in western Placer County to SR 70/99 in south Sutter County. It will link existing and planned development near some of the region's fastest growing communities while improving access to the I-5 corridor, downtown Sacramento, and the Sacramento International Airport.*



Work, via two phases, is underway to identify and preserve a corridor for right-of-way acquisition.

**Phase 1: Identify Corridor Alternatives**  
 Completed – September 2005  
 » [5 Recommended Corridor Alternatives](#) (September 2005)

**Phase 2: Complete Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR)**

*Draft Tier 1 EIS/EIR - released July 2, 2007*

- » [Notice of Availability](#)
- » [Extended Public Comment Period ended 9/25/07](#)

*Partially Revised Draft Tier 1 EIS/EIR - released January 30, 2009*

- » [Notice of Availability](#) (March 2009)

*Final Tier 1 EIS/EIR - summer 2009*

Maps and spreadsheets within this website are PDF files, many of them large in size. If you are having trouble viewing/downloading content, you may arrange for hardcopies by calling (530) 823-4030 or by sending an [email](mailto:email@pctpa.net) PCTPA. To view PDF files, you will need [Adobe Acrobat Reader](#).



For project questions/comments, please contact the Placer County Transportation Planning Agency (PCTPA)

Placer County Transportation Planning Agency  
 299 Nevada Street • Auburn, CA 95603  
 (530) 823-4030 • (530) 823-4036 - fax  
 email PCTPA

## PROJECT DESCRIPTION

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### THE CONCEPT - PLACER PARKWAY

The concept for the Placer Parkway is over a decade old. Placer County's 1994 General Plan depicts a 'plan line' for it. The following planning studies helped to refine the concept:

 [2000 Placer Parkway Interconnect Study/Conceptual Plan \(Concept Plan\)](#)

 [2001 Project Study Report \(PSR\)](#)

These documents outline goals, policies, and implementation mechanisms; identify conceptual alignments to help gauge costs for future environmental and engineering studies; and explore funding strategies.

### THE PROJECT – CORRIDOR PRESERVATION

The objective of the Placer Parkway Corridor Preservation project is to identify and preserve an approximate 15-mile long, 500'- to 1,000'-wide corridor between SR 65 and SR 70/99. The corridor width will vary among three segments:

- East – 500'-wide from SR 65 to Fiddymment Rd.
- Central -- 1,000'-wide from Fiddymment Rd. to Pleasant Grove Rd.
- West -- 500'-wide from Pleasant Grove Rd. to SR 70/99

There are two phases to the corridor preservation project:

- Phase 1 - Identify [Corridor Alignment Alternatives](#) *(completed September 2005)*
- Phase 2 - Complete a broad-based [Tier 1 Environmental Impact Statement and Environmental Impact Report \(Tier 1 EIS/EIR\)](#) *(expected completion by Summer 2008)*

Corridor acquisition can begin only after the Tier 1 EIS/EIR is completed.

### THE NEED AND PURPOSE


Problem (Need): Planning studies to refine the concept showed that the Placer Parkway is needed to respond to greater travel demand and congestion related to planned population and jobs growth as well as to improve goods movement.

The project vicinity is near some of the fastest growing communities in the Sacramento region – Lincoln, Rocklin, Roseville, and the Sunset Industrial Plan Area. A number of proposed urban development projects in the vicinity are also being considered. These community and specific plans would add significant amounts of new residential, commercial, industrial, and educational land uses. The high-technology industry in the SR 65 corridor, plus Sutter County's proposed Sutter Pointe Specific Plan will require dependable access to move high value/time critical freight to both the Sacramento international Airport and the Lincoln Regional Airport.

Solution (Purpose): The purpose of the Placer Parkway is to preserve a right-of-way, to respond to existing/anticipated travel demand and congestion, and to provide access to the regional transportation system for jobs growth.

Planned/proposed urban development in the project vicinity is accelerating. Opportunities for building a new connector may be lost unless action is taken to preserve right-of-way. The Parkway will reduce pressure on the

existing transportation network and address anticipated future congestion on local roadways. It will improve travel time between the SR 65 corridor and SR 70/99. The Parkway will also improve regional access for project vicinity businesses.

For additional details, see [ENVIRONMENTAL REVIEW](#) or  [Purpose and Need Statement - Concurrence Version](#) (February 2005).

#### **FUTURE DESIGN AND CONSTRUCTION**

There is no design or construction work involved in this corridor preservation project. As funding becomes available, a project-level (Tier 2) environmental review will determine the specific footprint of the roadway within the selected corridor. Other transportation modes including bus rapid transit maybe developed in the Parkway corridor.

The future four-to six-lane roadway will have up to six interchanges:

- SR 65 @ Whitney Rd.
- Athens Connector Rd.
- Fiddymment Rd.
- Up to two in Sutter County's future South Sutter Co. Specific Plan area
- SR 70/99 (between Riego Rd. and Sankey Rd.)

A seventh potential interchange could be located in the Parkway's central segment. It could connect the Parkway with a possible extension off Watt Ave. The possible extension and connection are not a part of this project.

#### **AGENCIES INVOLVED**

In 2002, the [Placer County Transportation Planning Agency](#) (PCTPA) began work on the project. PCTPA is the State-mandated regional transportation planning agency for Placer County (excluding the Lake Tahoe basin). PCTPA member jurisdictions consist of Placer County, Auburn, Colfax, Lincoln, Loomis, Rocklin, and Roseville.

PCTPA is carrying-out the work for the [South Placer Regional Transportation Authority](#) (SPRTA). SPRTA is a joint powers authority made up of Placer County, Lincoln, Rocklin, and Roseville. The Placer Parkway is one of several regional transportation projects being partially funded by SPRTA's transportation impact fee program. PCTPA provides administrative, accounting, and staffing support for SPRTA. For more, see [www.pctp.net](http://www.pctp.net).

Coordination for the Placer Parkway Corridor Preservation project and its Tier 1 EIS/EIR is being carried out with a number of agencies, organizations, property owners, and interested individuals. Some of the agencies and organizations involved are:

- [Federal Highway Administration \(FHWA\)](#)
- [California Department of Transportation \(Caltrans\)](#)
- [U.S. Army Corps of Engineers - Sacramento District](#)
- [U.S. Environmental Protection Agency - Region IX](#)
- [U.S. Fish and Wildlife Service](#)
- [Sacramento Area Council of Governments \(SACOG\)](#)
- [Placer County](#)
- [Sacramento County](#)
- [Sutter County](#)
- [City of Lincoln](#)
- [Town of Loomis](#)
- [City of Rocklin](#)
- [City of Roseville](#)
- [City of Sacramento](#)
- [Natomas Basin Conservancy](#)

See [PUBLIC OUTREACH](#) for more on coordination with community and special interest groups, property owners, and the general public.

**PROJECT TEAM**

PCTPA retained [URS Corporation \(URS\)](#) to help complete project work. The URS consultant team consists of the following primary firms:

- [DKS Associates](#) – traffic forecasting and analysis
- [Moore Iacofano Goltsman](#) – public outreach
- [Nossaman Guthner Knox Elliott, LLP](#) – legal issues
- [North Fork Associates](#) – land use and agricultural issues
- [Mara Feeney & Associates](#) – community impacts

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(530) 823-4030 • (530) 823-4036 - fax  
*email PCTPA*

## ENVIRONMENTAL REVIEW

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Phase 1 of the Placer Parkway Corridor Preservation Project is to identify a reasonable range of alternatives. These corridor alignment alternatives (see [CORRIDOR ALTERNATIVES](#)) will be analyzed in Phase 2 – the Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR).

### TIERING

Plans for large infrastructure projects, such as the Placer Parkway, are developed over many years. Generally, greater detail becomes available as the planning process moves forward. To make sure that environmental analysis is included and considered as early in the process as feasible, federal and State environmental laws allow for a tiered environmental review. "Tiering" is a streamlining concept for large infrastructure projects with several stages or phases. It is a way to focus environmental studies during the planning process at the same level of detail as the plans.

 [Description of "Tiering"](#)

### TIER 1 EIS/EIR

This document coordinates federal (National Environment Policy Act – NEPA) and State (California Environmental Quality Act – CEQA) requirements for the Placer Parkway Corridor Preservation Project. It will evaluate the corridor alternatives and will lead to the selection of one corridor for right-of-way preservation.

The [Federal Highway Administration \(FHWA\)](#), the [California Department of Transportation \(Caltrans\)](#), and the [South Placer Regional Transportation Authority \(SPRTA\)](#) propose to select and preserve a corridor for the future construction of the Placer Parkway. FHWA is the NEPA lead agency. SPRTA is the CEQA lead agency. SPRTA has authorized [Placer County Transportation Planning Agency \(PCTPA\)](#) to carry out the work.

### ENVIRONMENTAL PROCESS

The following steps are being taken to complete the Placer Parkway Corridor Preservation Tier 1:

1. **Scoping**  
The scoping process solicits input from the public and agencies regarding the extent and significant environmental issues to be addressed in the environmental document. The [Notice of Intent \(NOI\)](#), to address NEPA provisions, was published in the Federal Register on September 18, 2003. The [Notice of Preparation \(NOP\)](#), to address CEQA provisions, was sent to the State Clearinghouse on September 22, 2003 as well as to interested agencies, organization, and individuals. These notices serve as the official legal notice that the Tier 1 EIS/EIR is to be prepared.  
  
As part of the scoping process, two public scoping meetings were held. The first, on October 6, 2003, was in Roseville. The second was held in Pleasant Grove on October 9, 2003. For background and recap, see [PUBLIC OUTREACH](#).
2. **Draft Tier 1 EIS/EIR** (2007)  
It evaluates the corridor alternatives, identified by the SPRTA Board in September 2005. It will lead to the selection of one corridor for right-of-way preservation. The Draft Tier 1 EIS/EIR emphasizes the relative differences among the corridor alternatives regarding potential impacts. This information will allow for an informed choice among the alternatives. The Draft Tier 1 EIS/EIR focuses on



broad topics such as general location, mode choice, and area-wide air quality and land use, along with other environmental issues. It also identifies mitigation strategies to be used in later design/construction (Tier 2) environmental reviews.

The [Draft Tier 1 EIR/EIS](#) was released for public review and comment on July 2, 2007. Public hearings were held in Yuba City on August 6, 2007 and in Roseville on August 8, 2007 to get comments on the Draft. The extended comment period closed on September 25, 2007 (for more info, see [PUBLIC OUTREACH](#)).

The following [technical reports/studies](#) are the basis of the [Draft Tier 1 EIS/EIR](#):

- o [Air Quality Technical Memorandum](#)
- o [Archaeological Survey Report](#)
- o [Community Impact Assessment](#)
- o [Historical Properties Survey Report](#)
- o [Historical Resources Evaluation Report](#)
- o [Hydrology & Floodplain Technical Memorandum](#)
- o [Initial Site Assessment](#)
- o [MEPLAN Technical Report](#)
- o [Natural Environmental Study](#)
- o [Public Participation Methodology Report](#)
- o [Transportation Technical Report](#)
- o [Traffic Noise Analysis Technical Memorandum](#)
- o [Visual Impact Assessment](#)
- o [Water Quality Technical Memorandum](#)

#### [Partially Revised Draft Tier 1 EIS/EIR](#) (2009)

##### **February 27, 2008 SPRTA Board Workshop:**

This workshop was held in response to several comments about how the project's access and no-development buffer components were treated in the Draft Tier 1 EIS/EIR (released in June 2007). These components would limit access (no new interchanges) between Pleasant Grove Road and Fiddymont Road and would create a 'no-development' buffer along the future roadway. The limited access provision would ensure that the future freeway is free-flowing and reduce the potential for growth inducement. The no-development buffer would establish a variable area next to the freeway that would be protected from development, to enhance the 'parkway' concept and reduce the potential for growth inducement.

The comments identified concerns that in the future, new proposals by others might result in additional interchanges, or reduce/eliminate the no-development buffer, resulting in potentially more growth inducement. The workshop's purpose was to develop a strategy to address these concerns and move forward with the environmental review process.

##### **March 26, 2008 SPRTA Board Meeting:**

The Board directed the staff to prepare and circulate for public comment, an analysis of these hypothetical future actions, even though they are not proposed by SPRTA, and are not part of the project described or analyzed in the Draft Tier 1 EIS/EIR. The SPRTA Board felt that this approach would provide a fuller disclosure of potential hypothetical future impacts if such actions were proposed by others in the future as well as would provide a stronger foundation for later Tier 2 (construction-level) environmental work, which will analyze the roadway impacts within the selected corridor.

#### [Partially Revised Draft Tier 1 EIS/EIR](#)

Based on SPRTA Board direction, the [Partially Revised Draft Tier 1 EIS/EIR](#) was released for public comment in late January 2009 ([see January 2009 NOA](#)).

The Partially Revised Draft Tier 1 EIS/EIR consists of two parts: 1) updated data from the 2007 Draft Tier 1 EIS/EIR and 2) the analyses of hypothetical future

## PUBLIC OUTREACH AND EVENTS

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**EXTENDED COMMENT PERIOD CLOSED**  
 The extended comment period for the Partially Revised Draft Tier 1 EIS/EIR closed on May 11, 2009. Six sets of comments were received.

### **FEBRUARY 2009 PUBLIC HEARINGS – PARTIALLY REVISED DRAFT TIER 1 EIS/EIR**

The SPRTA Board conducted public hearings to receive comments on the Partially Revised Draft Tier 1 EIS/EIR on:

February 23 – 6:00 p.m. Veteran’s Memorial Community Building 1425 Veterans memorial Circle Yuba City, CA

February 25 – 9:00 a.m. Placer County Board of Supervisors’ Chambers (The Domes) 175 Fulweiler Ave. Auburn, CA

Both public hearings had similar formats. The staff used a PowerPoint presentation to highlight the proposed project, environmental review process including the Partially Revised Draft, and next steps in the process. The hearings were lightly attended. There was one speaker at the Yuba City hearing. There were two at the Auburn hearing. All letters and public hearing comments will be addressed in the Final Tier 1 EIS/EIR.

### [FEBRUARY 2008 PUBLIC WORKSHOP](#)

### [AUGUST 2007 PUBLIC HEARINGS - RECAP](#)

### **CORRIDOR ALTERNATIVES AND ENVIRONMENTAL SCOPING**

The public outreach and agency coordination process to identify the reasonable range of alternatives and to start the proposed project's environmental review, to date, include:

- [Community stakeholder interviews](#)  
 [Interviews with Community Stakeholders Summary Report](#)  
*(September 2003)*
- [18 advisory committee meetings](#)  
 Technical Advisory Committee (TAC), Study Advisory Committee (SAC), and Policy Advisory Committee (PAC) meeting agendas, materials, and minutes are available - [contact PCTPA](#).
- [Public scoping meetings in Roseville \(October 6, 2003\) and Pleasant Grove \(October 9, 2003\)](#)  
 [Scoping Meetings & Scoping Process Summary Report](#)
- [Public Meetings in Roseville \(August 23, 2004\) and Pleasant Grove \(August 26, 2004\)](#)  
 [Public Meetings Summary Report](#) *(August 2004)*
- [Newsletters](#)  
 [July 2004](#); [August 2005](#); [February 2007](#); [July 2007](#); [January 2009](#)
- [21 interagency meetings \(modified NEPA/404 process\) with federal resource agencies](#)  
 Meeting agendas, materials, and minutes are available - [contact PCTPA](#).
- [Numerous meetings with FHWA, Caltrans, other State and regional agencies, local jurisdictions, community groups, special interest groups, property owners, and other interested organizations/individuals](#)  
 [Project Summary Outline](#) *(updated June 2009)*
- [Status reports to the SPRTA Board, Sutter County](#)

Board of Supervisors, and local jurisdictions (such as Placer County, Lincoln, Rocklin, and Roseville)

Reports are available - [contact PCTPA](#).

- [August 2007 Public Hearings](#)
- [February 2008 Public Workshop](#)
- [February 25, 2009 SPRTA Board Meeting](#)

For information on when public outreach events took place, see the [PROJECT SCHEDULE](#).

#### ADVISORY COMMITTEES

Three project advisory committees are tracking the project and its environmental review.

- [Technical Advisory Committee \(TAC\)](#)
- [Study Advisory Committee \(SAC\)](#)
- [Policy Advisory Committee \(PAC\)](#)

#### HOW TO STAY INVOLVED

Continuing public input and project team response are key actions to ensure the completion of a comprehensive planning and environmental review process. Your comments or feedback on the project and its environmental review is important. Please plan to attend future public meetings and hearings. To request project information such as meeting notices and newsletters, please contact:



#### [Placer County Transportation Planning Agency \(PCTPA\)](#)

299 Nevada Street  
Auburn, CA 95603  
(530) 823-4030 - phone  
(530) 823-4036 - fax  
[email](#)

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The Library is organized according to phases and general chronology of the project. If what you are looking for is not located in the Library or if you have difficulty viewing any of these documents, please contact PCTPA at (530) 823-4030 or by [email](#) to obtain a copy.

Many of the documents contained in the Project Library are Adobe PDF files. To view PDF files, you will need [Adobe Acrobat Reader](#).



### **BACKGROUND INFORMATION**

 [Project Location Map](#)

 [Project Study Area Map](#)

 [Project Summary Outline](#) (updated June 2009)

### **PHASE 1 -CORRIDOR ALTERNATIVES IDENTIFICATION**

 [Placer Parkway Interconnect Study/Conceptual Plan](#) (2000)

- [Figure B](#)
- [Appendix C](#)

 [Placer Parkway Project Study Report](#) (2001)

 [Interviews with Community Stakeholders – Summary Report](#) (September 2003)

 [Technical Memorandum with Appendices A & B](#) (September 2004)

#### Figures:

- [Project Location Map](#)
- [PSR Concept Alignments](#)
- [PSR Alternatives: Schematic Alignments](#)
- [PSR Alignment Alternatives](#)
- [Waterfowl and Other Upland Wildlife Habitat](#)
- [Potential Special Status Species Habitat](#)
- [Riparian, Wetland and Conservation Areas](#)
- [Vernal Pool Critical Habitat](#)
- [Vernal Pool Complexes](#)
- [Socioeconomic Resources](#)
- [Identified Cultural Resources](#)
- [Floodplains](#)
- [Hazardous Waste Sites of Potential Concern](#)
- [Farmland Designations](#)
- [Potential Major Development Areas](#)
- [Appendix C - Transportation Screening - Detailed Data](#)
- [Appendix D - Environmental Screening - Detailed Data](#)


 [Tier 1 EIS/EIR Corridor Alternatives Identification Process](#)

 [July 2004 Newsletter](#)

 [Public Meetings Summary Report](#) (August 2004)


 [August 2005 Newsletter](#)

 [Alternatives Development Summary Report](#) (September 2005)

 [Five Recommended Corridor Alignment Alternative - Draft for SPRTA Approval](#) (September 1, 2005)

 [PSR Corridor Alternatives Evaluated](#)

 [Other Potential Corridor Alternatives Identified and Evaluated](#) (August 2004) - 6.9mb

 [Potential Corridor Alignment Alternatives for Evaluation in the Tier 1 EIS/EIR](#) (August 2004) - 6.9mb

 [Proposed Foothill Alignments Shown with PCTPA's Potential Corridor Alignment Alternatives](#)

 [Five Corridor Alignments Alternatives to be Analyzed in Tier 1 EIS/EIR](#) (September 28, 2005)

### **PHASE 2 - TIER 1 EIS/EIR**

 [Description of "Tiering"](#)

 [Notice of Intent \(NEPA\)](#) (September 2003)

 [Notice of Preparation \(CEQA\)](#) (September 18, 2003)

 [Scoping Meetings & Scoping Process Summary Report](#) (October 2003)

 [February 2007 Newsletter](#)


 [July 2007 Newsletter](#)

 [Draft Tier 1 EIS/EIR Notice of Availability](#) (June 2007)


 [Draft Tier 1 EIS/EIR \(2 Volumes\)](#)

 [Draft Tier 1 EIS/EIR Technical Reports](#)

- [Air Quality Technical Memorandum](#)
- [Archaeological Survey Report](#)
- [Community Impact Assessment](#)
- [Historical Properties Survey Report](#)
- [Historical Resources Evaluation Report](#)
- [Hydrology & Floodplain Technical Memorandum](#)
- [Initial Site Assessment](#)
- [MEPLAN Technical Report](#)
- [Natural Environmental Study](#)
- [Public Participation Methodology Report](#)
- [Transportation Technical Report](#)
- [Traffic Noise Analysis Technical Memorandum](#)
- [Visual Impact Assessment](#)
- [Water Quality Technical Memorandum](#)

 [August 2007 Public Hearing Presentation and Materials:](#)

- [August 6 and 8, 2007 Hearing Agendas](#)
- [Comment Cards](#)
- [Speaker Cards](#)
- [Corridor Alternatives Poster](#)
- [Planned and Proposed Major Developments Poster](#)
- [Public Hearing Instructions Poster](#)
- [Executive Summary Tier 1 EIS/EIR](#)
- Yuba City Hearing (August 6, 2007): [Transcript](#)
- Roseville Hearing (August 8, 2007): [Transcript](#) / [Video](#)

 [February 2008 SPRTA Board Public Workshop - Access and Buffer Options Presentation and Materials](#)

[February 27, 2008 – SPRTA Board Public Workshop](#)


- [Staff Memo – February 13, 2008](#)
- [Environmental Document Approaches Summary \(Pro-Con Table\)](#)
- [PowerPoint Presentation](#)
- [Workshop Notice & Distribution List](#)

[March 26, 2007 - SPRTA Board Meeting](#)

- [Staff Memo – March 12, 2008](#)
- [Environmental Document Approaches Summary \(Pro-Con Table\)](#)

 [January 2009 Newsletter](#)

 [Partially Revised Draft Tier 1 EIS/EIR Notice of Availability](#) (January 2009)

 [Partially Revised Draft Tier 1 EIS/EIR Notice of Availability \(Extension of Comment Period\)](#) (March 2009)

 [Partially Revised Draft Tier 1 EIS/EIR](#)

[February 2009 Public Hearing Presentations and Materials:](#)

- [February 23 Hearing Agenda - Yuba City](#)
- [February 25 Staff Memo - Auburn](#)
- [Yuba City Public Hearing – PowerPoint Presentation](#)
- [Corridor Alternatives Poster](#)
- [Planned/Proposed Development Poster](#)
- [Yuba City \(February 23, 2009\) Hearing Transcript](#)
- [Auburn \(February 25, 2009\) Hearing Transcript](#)

[February 25, 2009 SPRTA Board Meeting](#)

- [Staff Memo – February 12, 2009](#)
- [Board Meeting Minutes](#)


**MODIFIED NEPA/404 PROCESS:**

 [Modified NEPA/404 MOU](#) (April 2004)

 [Purpose and Need Statement - Concurrence Version](#) (February 2005)

 [Criteria for Selecting the Range of Alternatives - Concurrence Version](#) (June 2005)

 [Range of Alternatives - Concurrence Version](#) (January 2006)

 [Alternative\(s\) Most Likely to Contain the Least Environmentally Damaging Practicable Alternative \(LEDPA\)](#) (underway)

[FHWA March 2008 Update](#)

[June 24, 2008 FHWA Concurrence Request Letter:](#)

- [A – Additional Analysis of Growth Inducement](#)
- [B – Additional Analysis of Secondary & Indirect Impacts on Biological Resources](#)
- [C – Additional Analysis of Cumulative Impacts](#)
- [D – Comment Letters: Placer & Sutter Counties and the City of Roseville](#)

[August 14, 2008 US Corps/EPA Non-concurrence Letter](#)

[October 15, 2008 Informal \(Mid-Level Mqrs Elevation\) Meeting:](#)

- [October 15 Meeting Agenda](#)
- [Briefing Paper with Project Alternatives and MEPLAN maps](#)
- [Sign-in Sheet](#)

[October 23, 2008 PCCP & Placer Parkway LEDPA USACE Meeting:](#)

- [October 23 Agenda](#)
- [Briefing Paper](#)
- [6 maps](#)

[October 23, 2008 – Congressman Lungren – USACE Coordination Meeting:](#)

- [October 23, 2008 – Congressman Doolittle Letter](#)

[December 16, 2008 Regulatory Issues Meeting - USACE, USEPA, USFWS, FHWA – Washington D.C.](#)

- [Meeting Agenda](#)
- [Attendance List](#)
- [LEDPA Concurrence Brief](#)
- [Meeting Summary](#)

[January 23, 2009 Formal \(Senior Level Mqrs\) Elevation Meeting – San Francisco](#)

- [LEDPA Concurrence Dispute](#)
- [Formal Elevation Brief Meeting Summary](#)
- [Sign-in Sheet](#)

[April 17, 2009 Conservation Framework Meeting](#)

- [Meeting Agenda](#)
- [Sign-in Sheet](#)
- [Preliminary Draft – Alternative #5 LEDPA Options](#)
- [SPRTA Board – April 22, 2009 Meeting Summary](#)
- [Regulatory Agencies – April 24, 2009 Board Summary](#)

[Transportation Agencies' Follow-up to Preliminary Draft Placer Parkway Alternative 5 LEDPA Options](#)

[May 29, 2009 Conservation Framework Meeting #2](#)

- [Meeting Agenda](#)
- [Sign-in Sheet](#)

[June 12, 2009 No Access Easement Information for Regulatory Agencies' Review](#)

#### **MEETING AGENDAS/MINUTES/MATERIALS**

Meeting agendas, minutes, materials, and status reports are available – please [contact PCTPA](#).

Technical Advisory Committee (TAC)

Study Advisory Committee (SAC)

Policy Advisory Committee (PAC)

South Placer Regional Transportation Authority (SPRTA)

Sutter County Board of Supervisors

Interagency Meetings (Modified NEPA/404 Process)



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**APPENDIX C  
PURPOSE AND NEED STATEMENT –  
AGENCY CONCURRENCE VERSION**





**PURPOSE & NEED STATEMENT**

**CONCURRENCE VERSION**

**PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/EIR  
FEBRUARY 16, 2005**

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**CHAPTER 2 – PROJECT PURPOSE AND NEED**

**2.0 PURPOSE OF AND NEED FOR THE PROPOSED PROJECT**

**2.1 Purpose**

The goal of the Tier 1 phase of the proposed Placer Parkway project is to preserve a right-of-way for a proposed transportation facility that contributes to the ultimate project purpose. The ultimate purpose of the proposed Placer Parkway project is to reduce anticipated congestion on the local and regional transportation system and advance economic development goals in southwestern Placer County and south Sutter County.

The Placer Parkway's objectives are:

**2.1.1 Preserving Right-of-Way**

The purpose of the proposed action is to preserve right-of-way for a new or upgraded east-west connector between SR-65 and SR-70/99 serving cities and unincorporated areas across southwestern Placer County and south Sutter County. Planned and proposed development in the project vicinity has been accelerating over the last few years, and opportunities for building a new or upgraded connector may be lost unless action is taken now to preserve right-of-way for project construction.

**2.1.2 Responding to Existing and Anticipated Travel Demand**

The proposed Placer Parkway would be designed to reduce pressure on the existing transportation network and to address anticipated future congestion on the local roadway system in southwestern Placer County and south Sutter County. The proposed project would be designed to reduce total vehicle hours traveled (VHT) during the morning and evening peak commute periods (i.e., 6 to 9 AM and 3 to 6 PM), reduce the amount (VMT) and duration of travel that is spent in congested conditions in Southwestern Placer County, and improve travel times between the SR 65 corridor and SR 70/99 by maintaining a travel speed at or near the free flow speed of the Parkway, which on a freeway reflects LOS C to D conditions.<sup>1</sup>

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<sup>1</sup> Free flow speed and LOS C and D conditions on a freeway do not preclude an alternative based on: expanding existing roads, a non-freeway facility, a Transportation System Management (TSM) alternative, a shorter Parkway Alternative, or a combination of the aforementioned.

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## PURPOSE & NEED STATEMENT

### CONCURRENCE VERSION

#### PLACER PARKWAY CORRIDOR PRESERVATION TIER 1 EIS/EIR FEBRUARY 16, 2005

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#### 2.1.3 Providing Access to the Regional Transportation System in Areas Planned or Projected for Job Growth

Placer Parkway would be designed to improve regional accessibility for businesses and jobs in the project vicinity including access to SR 70/99 and the I-5 corridor in northern Sacramento County including access to the Sacramento airport. With its controlled access, an objective of the proposed transportation facility would be to strike a balance among advancing planned job growth along the SR-65 and SR-70/99 corridors, avoiding urban growth inducement in areas not designated for development, and helping to preserve the rural character of southwestern Placer County and south Sutter County.

#### 2.2 NEED

The needs for the proposed project are discussed below. The ordering of the specific needs is not intended to imply a prioritization or order of importance.

##### 2.2.1 Need to Preserve Right-of-Way

The project vicinity includes some of the fastest growing communities in the Sacramento Metropolitan region -- Roseville, Rocklin, Lincoln and the Sunset Industrial Area. SACOG projects that the population in southwestern Placer County will nearly double between 2000 and 2025. Employment in the SR-65 high-technology corridor is expected to grow even faster than population. The anticipated development to support this increased population and employment will dramatically increase travel demand over the next 20 years and beyond.

The study area is under intense development pressure. Cities and counties are processing development applications and approving entitlement of new land uses in the study area. This is an ongoing process and the future of proposed land uses in the study area is not yet certain. However, given the ongoing environmental review of existing applications (including the Placer Vineyards Specific Plan and the West Roseville Specific Plan and Sphere of Influence Annexation Area), the number of recent applications or pre-application submittals, and interest by the development community, it is apparent that it will become increasingly difficult and expensive to identify an appropriate corridor as a solution that meets the ultimate purpose of the proposed project. Failure to preserve a corridor as soon as feasible would risk losing the

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opportunity to reduce environmental impacts and costs.

2.2.2 Travel Demand and Anticipated Congestion

Population Growth

Growth in population in southwestern Placer County, northern Sacramento County and south Sutter County will influence travel demand in the project vicinity. The project vicinity includes some of the fastest growing communities in the Sacramento region – Roseville, Rocklin, Lincoln and the Sunset Industrial Area. SACOG projects that the population in southwestern Placer County will nearly double between 2000 and 2025.

The anticipated population in the region will dramatically increase travel demands in southwestern Placer County and south Sutter County over the next 20 years and beyond. The jurisdictions in southwestern Placer County have developed Capital Improvement Programs (funded by development fees) that would maintain a high level of service on their local roadway systems. However, limited improvements are programmed for the regional roadway system and travel speeds/travel times from Placer County to both Sacramento and Sutter counties are projected to deteriorate over the next 20 years, even with improvements to local roadways already identified in local general plans.

Job Growth and Goods Movement

The I-80 corridor is the major trans-Sierra roadway in northern California accommodating the movement of goods and services. Goods and services are moved to and through the project area at a growing rate using three primary modes of transportation: road, air, and rail. The combined increase of vehicles used for the movement of goods and services as well as passenger vehicles has lead to increased congestion, which in turn decreases in travel times in the project area and competition for roadway capacity.

When the travel forecast model is completed, this information will be augmented with data to support this need. For now, note:

Current (2001) truck volumes and percentages:

> SR 65 north of I-80 – 9,060 trucks out of 60,000 total volume (15.1%)

> I-80 at Placer/Sacramento County line – 8,700 trucks out of 145,000 total volume (6%)

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Congestion on the regional roadways connecting Placer County with Sutter and Sacramento counties will adversely impact access to jobs. The projected increase in travel times will affect the movement of goods and people, and will have an impact on the region's economy. By 2025, SACOG estimates that total employment in southwestern Placer County (172,000 employees) will exceed total employment in downtown Sacramento (154,000 employees). The high-technology industry in the SR-65 corridor, plus development of Sutter County's industrial/commercial reserve area, requires dependable access to airports to move high-value/time-critical freight. Thus, direct and convenient access and reliable travel times to both the Sacramento International Airport and the Lincoln Regional Airport are very important to this growing regional job center.

**APPENDIX D**  
**MITIGATION MONITORING AND REPORTING PROGRAM**



**Appendix D**  
**Mitigation Monitoring and Reporting Program**  
**Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/Environmental Impact Report<sup>1</sup>**

Measure Number	Task and Brief Description	Responsible Entity <sup>2,3</sup>	Timing
<b>1. Land Use</b>			
4.1.1	Mitigation Commitment: To maintain existing and future local roadway connectivity (for emergency access, farming operations and community access), which will contribute to avoidance of land use conversion, overcrossings will be constructed, as appropriate, to convey traffic over the Parkway. These overcrossings would not connect to the Parkway.	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.1.2	Mitigation Consideration: In consultation with local jurisdictions, strategies considered at Tier 2 will include efforts in the design of the Parkway to avoid or reduce impacts, such as: <ul style="list-style-type: none"> <li>• Appropriate adjustments to the location of the actual roadway within the Parkway corridor alignment.</li> <li>• Provision of alternative access to remnant parcels.</li> <li>• Determination of the number, location and design of specific project features such as overcrossings.</li> </ul>	Lead Agency, Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.1.3	Mitigation Consideration: At Tier 2, the identification of bisected parcels would enable parcel-specific mitigation to be developed. Strategies to reduce impacts on individual affected parcels could include providing access between the remnant portions of bisected parcels via frontage roads and overcrossings, crafting agreements with agricultural property owners that would include residual rights provisions to encourage continuation of farming activities in the area of the buffer zone that would not be used for the Parkway, or rezoning or purchasing remnant parcels that would no longer be viable for continued use under existing zoning. Any property purchases would comply with the requirements of the Uniform Relocation and Assistance Real Properties Acquisition Act.	Project Proponent	Identify during Tier 2 analyses. Purchase/lease may extend beyond completion of Tier 2, but would be completed prior to construction.

<sup>1</sup> Mitigation Commitments were identified where appropriate at a Tier 1/Program level of analysis. Mitigation Considerations were identified where actual mitigation would depend upon Tier 2 activities. Mitigation Considerations would be evaluated during Tier 2 evaluation, and incorporated, modified, or rejected as appropriate.

<sup>2</sup> The project proponent and lead agency for Tier 2 activities are unknown. They could be the same entity or different entities, and could include South Placer Regional Transportation Agency, Placer County, Sutter County, the City of Roseville, a Joint Powers Authority, or some combination of these entities.

<sup>3</sup> If the Project Proponent and the Lead Agency are different entities in Tier 2, the Project Proponent will prepare a report documenting status of compliance with the Tier 1 MMRP, and submit it to the Lead Agency prior to the release of the Draft Tier 2 environmental document. The Lead Agency will include in their Tier 2 MMRP a summary of the status of compliance with the Tier 1 MMRP, including identification of Tier 2 mitigation measures that implement Tier 1 Mitigation Commitments.

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**(Continued)**

Measure Number	Task and Brief Description	Responsible Entity	Timing
4.1.4	<p>Mitigation Consideration: In consultation with local jurisdictions, strategies considered at Tier 2 will include efforts in the design of the Parkway to avoid or reduce impacts, such as:</p> <ul style="list-style-type: none"> <li>• Appropriate adjustments to the location of the actual roadway within the Parkway corridor alignment.</li> <li>• Partnering with local jurisdictions to institute land use controls (if local jurisdictions deem these necessary or desirable), such as general plan amendments, zoning/overlay zoning changes, covenants/deed restrictions, agricultural/ conservation easements, and urban growth boundaries.</li> </ul>	Lead Agency, Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.1.5	Mitigation Consideration: Suggested mechanisms to reduce land use compatibility impacts are land purchase/leases that would allow for continued use of the buffer for agricultural purposes.	Lead Agency, Project Proponent	Identify during Tier 2 analyses. Implementation may extend beyond completion of Tier 2, but would be completed prior to construction.
<b>2. Socioeconomics and Community</b>			
4.2.1	Mitigation Commitment: To maintain existing and future local roadway connectivity (for emergency access, farming operations and community access), overcrossings will be constructed, as appropriate, to convey traffic over the Parkway. These overcrossings will not connect to the Parkway.	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.2.2	Mitigation Commitment: Any households or businesses displaced by the Parkway will receive relocation assistance payments and counseling in accordance with the Federal Uniform Relocation Assistance and Real Properties Acquisition Policies Act, as amended, to ensure that any displaced residents are relocated to a decent, safe, and sanitary home. All eligible displacees will be entitled to moving expenses and other benefits as provided by the act. All benefits and services will be provided equitably to all relocatees without regard to race, color, religion, age, national origins, or disability as specified under Title VI of the Civil Rights Act of 1964.	Project Proponent	At the time the property is acquired.



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Measure Number	Task and Brief Description	Responsible Entity	Timing
4.2.3	Mitigation Consideration: Alternatives 1, 4, and 5 could disrupt an existing rural residential community by displacing homes and converting a portion of the Sankey-Pleasant Grove community to a transportation corridor. Since no vital community services or gathering places would be impacted in either of the two affected areas, it may be possible to mitigate this potential impact and minimize potential adverse effects in these areas by relocating the displaced households within or close to the affected rural residential communities, if they so desire. Since no vital community services or gathering places would be impacted in either of these two areas, no mitigation is required beyond standard provisions of the Uniform Relocation and Real Property Acquisition Assistance Act.	Project Proponent	Implement Uniform Relocation and Real Property Acquisition Assistance Act At the time the property is acquired.
4.2.4	Mitigation Consideration: In consultation with local jurisdictions, mitigation strategies considered at Tier 2 will include the development of design improvements to reduce impacts, such as: <ul style="list-style-type: none"> <li>• Appropriate adjustments to the location of the actual roadway within the Parkway corridor alignment;</li> <li>• Provision of alternative access to remnant parcels; and</li> <li>• Determination of the number, location and design of specific project features such as overcrossings.</li> </ul>	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
<b>3. Environmental Justice</b> Because no environmental justice impacts are identified, no mitigation strategies have been recommended for Tier 1 or Tier 2.			
<b>4. Farmlands</b>			
4.4.1	Mitigation Commitment: To maintain existing and future local roadway connectivity (for emergency access, farming operations and community access), which will help to avoid/minimize future farmland impacts, overcrossings will be constructed, as appropriate, to convey traffic over the Parkway. These overcrossings will not connect to the Parkway.	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.4.2	Mitigation Consideration: Based on consultation with local jurisdictions, Tier 2 mitigation strategies will include the development of design improvements to reduce farmland impacts, such as: <ul style="list-style-type: none"> <li>• Appropriate adjustments to the location of the actual roadway within the Parkway corridor alignment;</li> <li>• Partnering with local jurisdictions to institute land use controls (if local jurisdictions deem these necessary or desirable), such as general plan</li> </ul>	Lead Agency, Project Proponent	During preliminary engineering as part of Tier 2 analyses.

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Measure Number	Task and Brief Description	Responsible Entity	Timing
	amendments, zoning/overlay zoning changes, covenants/deed restrictions, agricultural/conservation easements, and urban growth boundaries; and <ul style="list-style-type: none"> <li>• Determination of the number, location and design of specific project features such as overcrossings.</li> </ul>		
4.4.3	Mitigation Consideration: Farmland impacts could be reduced via land purchase/leases that would allow for continued use of the no-development buffer zone for agricultural purposes, subject to performance standards to be developed in Tier 2.	Project Proponent	Identify during Tier 2 analyses. Purchase/lease may extend beyond completion of Tier 2, but would be completed prior to construction.
4.4.4	Mitigation Consideration: Conversion of farmland to nonfarmland uses could be mitigated by preserving an equal amount of agricultural land within the respective counties in those areas that have not been approved or proposed for urban uses (i.e., primarily in the Central Segment). This would be consistent with Placer County's current policy of requiring one-to-one (1:1) replacement for agricultural land impacted by proposed projects where feasible. The no-development buffer zone as proposed would meet much of this mitigation goal, subject to performance standards to be developed in Tier 2. This mitigation strategy should be coordinated with the Placer and Sutter County Agricultural Commissioners, particularly in areas where agricultural lands will have been converted to other uses prior to Placer Parkway Tier 2 environmental review, to ensure that a fair share mitigation strategy is promoted. This mitigation strategy would reduce impacts to farmlands.	Project Proponent	Identify during Tier 2 analyses. Purchase/lease may extend beyond completion of Tier 2, but would be completed prior to construction.
4.4.5	Mitigation Consideration: Agricultural easements administered by land trusts (examples include Placer Land Trust, Ducks Unlimited, The Nature Conservancy, American Farmland Trust) or other nonprofit entities on agricultural parcels should be considered as a means to mitigate for the permanent loss of agricultural land within the Sutter and Placer County region. The Agricultural Land Stewardship Program established by the California Farmland Conservancy, administered by the Division of Land Resource Protection under the Department of Conservation, which is a grant program that aids in purchasing and/or partially funding agricultural easements, could also be applicable, as could agricultural easements administered by Placer County.	Lead Agency, Project Proponent	Identify during Tier 2 analyses. Purchase/lease may extend beyond completion of Tier 2, but would be completed prior to construction.
4.4.6	Mitigation Consideration: The Placer County Conservation Plan (PCCP) may be finalized	Lead Agency,	Depends upon status of

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Measure Number	Task and Brief Description	Responsible Entity	Timing
	and approved prior to corridor acquisition for the Parkway. At this time, Sutter County does not have similar established criteria, or a program to review, execute, and administer agricultural easements. The Natomas Basin Habitat Conservation Plan (NBHCP) may provide a structure that would be suitable for such mitigation.	Project Proponent	PCCP at completion of Tier 2. Utilize PCCP if available for mitigation. Also utilize NBHCP.
4.4.7	Mitigation Commitment: To maintain existing and future local roadway connectivity (for emergency access, farming operations and community access), which will help to avoid/minimize disruption to agricultural activities, overcrossings will be constructed, as appropriate, to convey traffic over the Parkway. These overcrossings will not connect to the Parkway.	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.4.8	Mitigation Consideration: Based on consultation with local jurisdictions, Tier 2 mitigation strategies will include the development of design improvements to reduce disruption to agricultural activities, such as: <ul style="list-style-type: none"> <li>• Provision of alternative access to remnant parcels.</li> <li>• Determination of the number, location and design of specific project features such as overcrossings.</li> <li>• Appropriate adjustments to the location of the actual roadway within the Parkway corridor alignment.</li> <li>• Partnering with local jurisdictions to institute land use controls (if local jurisdictions deem these necessary or desirable), such as general plan amendments, zoning/overlay zoning changes, covenants/deed restrictions, agricultural/conservation easements, and urban growth boundaries.</li> </ul>	Lead Agency, Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.4.9	Mitigation Consideration: Farmland impacts could be reduced via land purchase/leases that would allow for continued use of the no-development buffer zone for agricultural purposes, subject to performance standards to be developed in Tier 2. This could include short-term leasing agreements to farm portions of the future right-of-way in order to aid in offsetting the early conversion of agricultural land for transportation purposes and to encourage the continuation of agricultural production as long as feasible during the initial phases of the construction of the Parkway.	Lead Agency, Project Proponent	Identify during Tier 2 analyses. Purchase/lease may extend beyond completion of Tier 2, but would be completed prior to construction.
4.4.10	Mitigation Consideration: The Parkway may be inconsistent with Sutter County policies 6.A-1, 6.A-6 and 6.A-7, Placer County policies 7.A.1, 7.A.2, 7.A.3, 7.A.7, 1.H.3, and 1.H.4, as well as Sunset Industrial Plan Area policies 1.E.1, 1.E.2, 1.E.3, and 1.E.4.	Project Proponent, Placer and	During Tier 2 analyses.

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	<p>If the creation of parcels larger than the respective General Plan designated/Zoning Ordinance minimum size is not feasible, then the following mitigation strategies could be considered:</p> <ul style="list-style-type: none"> <li>• General Plan Amendments or Zoning Ordinance Amendments for the affected properties could be enacted to ensure consistency with ordinance requirements.</li> <li>• Sutter and Placer counties could enact a potential zoning overlay district for parcels reduced in size by Placer Parkway that would recognize the special nonconforming nature of these properties.</li> <li>• Parkway proponents could purchase remainder parcels in their entirety so that there would not be a zoning consistency issue.</li> </ul>	Sutter Counties	
<b>5. Public Services and Utilities</b>			
4.5.1	<p>Mitigation Commitment: To maintain existing and future local roadway connectivity (for emergency access, farming operations and community access), which will contribute to avoidance of public service impacts, overcrossings will be constructed, as appropriate, to convey traffic over the Parkway. These overcrossings will not connect to the Parkway.</p>	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.5.2	<p>Mitigation Consideration: Strategies related to potential reduction in the useful life of the landfill expansion area could include providing compensatory land, providing or participating in programs to reduce generation or increase diversion through new programs or new technologies, or contributing to infrastructure improvements that will eventually be needed to send materials off site. Given the magnitude of the impact and the long time period available for planning minimization strategies, impacts to the facility are likely to be minor.</p>	Project Proponent	<p>Identify during Tier 2 analyses. Implementation may extend beyond completion of Tier 2, but would be completed prior to construction.</p>
<b>6. Visual/Aesthetics</b>			
4.6.1	<p>Mitigation Commitment: All visual mitigation strategies will be designed and implemented with the concurrence of the Caltrans District Landscape Architect, or as defined by the Federal Highway Administration (FHWA).</p>	Lead Agency, Caltrans, Project Proponent	During Tier 2 design and analysis.

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<b>Measure Number</b>	<b>Task and Brief Description</b>	<b>Responsible Entity</b>	<b>Timing</b>
4.6.2	Mitigation Commitment: Parkway features and treatments will be designed to help complement the existing agricultural landscape within south Sutter and southwestern Placer counties where agricultural activities are projected to continue. In accordance with the FHWA and Caltrans requirements, the Caltrans District Landscape Architect will review all project features and treatments before project design completion.	Lead Agency, Caltrans, Project Proponent	During Tier 2 design and analysis.
4.6.3	Mitigation Commitment: Landscaping concepts for Placer Parkway will respect the topography and vistas in the study area and complement the varying character of land adjacent to the Parkway corridor. Where wetlands adjoin the Parkway, designs shall use appropriate wetland species to the extent practicable. At the time of the Tier 2 environmental review, a Landscaping Conceptual Plan shall be developed for the Parkway, to be reviewed by the Caltrans District Landscape Architect (see the Visual Impact Assessment for this Tier 1 EIS/EIR for further details). Lighting elements will be approved for safety by Caltrans.	Lead Agency, Caltrans, Project Proponent	During Tier 2 design and analysis.
4.6.4	Mitigation Consideration: In order to ensure compatibility with future planning efforts, it is assumed that local jurisdictions would also review the Visual Impact Assessment (URS, 2007a) for this Tier 1 EIS/EIR.	Placer County, Sutter County, City of Roseville, City of Rocklin	During Tier 2 design and analysis.
4.6.5	Mitigation Consideration: Design of lighting elements would consider requirements of the Landscaping Conceptual Plan for minimizing potential aesthetic impacts (e.g., shielding lighting elements, using lower voltage lighting for planting areas, and proposing lighting fixtures that complement the visual character of the area).	Lead Agency, Project Proponent	During Tier 2 design and analysis.
<b>7. Cultural Resources</b>			
4.7.1	Mitigation Commitment, Archeological Resources: If previously undetected archaeological resources are encountered during construction of the Parkway following the Tier 2 analysis, consistent with Caltrans policy, ground-disturbing activities within the vicinity would be halted until a qualified archaeologist can evaluate the nature and significance of the find. If the discovery includes human remains, the Placer and/or Sutter County Coroners and Department of Museums would also be consulted.	Construction Contractor	During construction, following the Tier 2 analysis.
4.7.2	Mitigation Commitment, Historic Built Environment Resources: Three properties in the study area (Assessor's Parcel Number [APN] 35-260-011, APN 35-260-014, and APN	Lead Agency, Project	During Tier 2 design and analysis.

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	017-130-0 require further evaluation for National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) eligibility. Following this evaluation, if the Parkway is expected to result in adverse impacts on NRHP and CRHR properties, then efforts will be made to develop a roadway design within the chosen corridor that avoids or minimize impacts on these resources as far as possible. If impacts cannot be avoided by such measures, consultation will be initiated with the State Historic Preservation Officer to identify potential measures to mitigate such impacts.	Proponent	
4.7.3	<p>Mitigation Commitment, Paleontological Resources: If paleontological resources are identified that cannot be avoided, the following mitigation strategies will be employed:</p> <ul style="list-style-type: none"> <li>• Pre-construction meetings should be held with key construction personnel to provide brief discussions pertaining to paleontological resource significance, visual identification, and discovery notification procedures.</li> <li>• Proposed construction areas will be monitored by a professional paleontologist during construction, to ensure that subsurface paleontological resources are adequately protected. Monitoring will include provisions for intermittent checking of excavation spoils for significant paleontological materials during site grading and excavation and measures for salvaging fossils, as necessary.</li> <li>• If unique paleontological resources are discovered, then all significant fossil material will be collected, prepared, identified, and curated into a state-designated scientific repository. Salvage operations will be conducted in accordance with professional paleontological standards (e.g., Society of Vertebrate Paleontology standards)</li> </ul>	Construction Contractor	Prior to and during construction following the Tier 2 analysis.
4.7.4	Mitigation Consideration, Archaeological Resources: If more extensive investigations carried out for the Tier 2 analysis identify previously unknown archaeological resources in the selected corridor alignment, then efforts can be made to align the roadway within the chosen corridor, and to develop a roadway design that avoids or minimizes impacts on these resources as far as possible.	Project Proponent	During Tier 2 design and analysis.
4.7.5	Mitigation Consideration, Historic Built Environment Resources: Mitigation for impacts on historic, built environment resources could include relocation of historic resource, recordation and documentation according to the National Park Service's Historic American Building Survey/Historic American Engineering Record standards, development of interpretive or educational exhibits, or development of an oral history project.	Lead Agency	During Tier 2 design and analysis.

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Measure Number	Task and Brief Description	Responsible Entity	Timing
4.7.6	Mitigation Consideration, Paleontological Resources: If more extensive investigations carried out for the Tier 2 analysis identify previously unknown paleontological resources in the selected corridor alignment, then efforts can be made to develop a roadway design within the chosen corridor that avoids or minimize impacts on these resources as far as possible.	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
<b>8. Traffic and Transportation</b>			
4.8.1	Mitigation Commitment: To maintain existing and future local roadway connectivity (for emergency access, farming operations and community access), which will contribute to mitigation of traffic impacts, overcrossings will be constructed, as appropriate, to convey traffic over the Parkway. These overcrossings will not connect to the Parkway.	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.8.2	<p>Mitigation Consideration, State Route (SR) 70/99: Under both 2020 and 2040 conditions, all of the corridor alignment alternatives for Placer Parkway would add traffic to SR 70/99 between Interstate 5 (I-5) and Riego Road and would cause a significant impact on the level of service (LOS) of this freeway segment. The following strategies (individually or in combinations) could reduce the Parkway's impacts on SR 70/99 by decreasing the length of time spent in LOS F conditions during the morning and evening peak periods:</p> <ul style="list-style-type: none"> <li>• Add high-occupancy vehicle lanes to SR 70/99 between Placer Parkway and I-5.</li> <li>• Construct a controlled-access roadway parallel to SR 70/99 between Riego Road and Elkhorn Boulevard. The roadway could carry short- to medium-range trips between future growth areas in southern Sutter County and northern Sacramento County that would otherwise use SR 70/99.</li> <li>• Provide substantial transit services in the SR 70/99 corridor, including express bus services during commute periods and frequent all-day services from urban areas of Sutter and southwest Placer counties to the Natomas area and downtown Sacramento.</li> <li>• Identify "fair-share" contributions for new development in portions of Placer, Sutter, and Yuba counties that would contribute traffic to SR 70/99 to help fund improvements to SR 70/99.</li> </ul> <p>The growth in traffic demand on SR 70/99 will stem from development over a wide area. Traffic impact fees on this new development are a potential source of funding for improvements in the SR 70/99 corridor. To adequately spread the cost of improvements on a fair-share basis, a mechanism such as a multijurisdictional Joint Powers Authority</p>	Caltrans, Lead Agency	During Tier 2 design and analysis. Implementation may extend beyond completion of Tier 2.

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Measure Number	Task and Brief Description	Responsible Entity	Timing
	that covers portions of Placer, Sutter, and Yuba counties, would need to be established to collect fees and plan, design, and construct improvements.		
4.8.3	<p>Mitigation Consideration, State Route 65: Under both 2020 and 2040 conditions, all of the corridor alignment alternatives for Placer Parkway would add traffic to SR 65 between Placer Parkway and the SR 65 Lincoln Bypass and would cause a significant impact on the LOS of this freeway segment. Several strategies were identified that by themselves or in combination could mitigate the LOS impacts on this segment of SR 65. These are as follows:</p> <ul style="list-style-type: none"> <li>• Widen SR 65 to six lanes between Placer Parkway and the SR 65 Lincoln Bypass by 2020.</li> <li>• Provide additional north-south capacity on local roadways parallel to SR 65.</li> <li>• Provide substantial transit services in the SR 65 Corridor.</li> <li>• Identify fair-share contributions for new development that would contribute traffic to SR 65 to help fund improvements to SR 65.</li> </ul> <p>The growth in traffic demand on SR 65 will stem from development over a wide area. Traffic impact fees on this new development are a potential source of funding for improvements in the SR 65 corridor. The South Placer Regional Transportation Authority (SPRTA) adopted the Regional Transportation and Air Quality Mitigation fee, which assesses new development for impacts on specified regional transportation facilities. One of these projects is to widen SR 65 between Interstate 80 (I-80) and Twelve Bridges Drive. In 2009, Placer County and the cities of Lincoln, Rocklin, and Roseville adopted a Tier II Memorandum of Agreement (MOA) fee program which includes \$480 million to fund the Placer Parkway. This funding will include improvements for the SR 65/Parkway/Whitney Ranch Parkway interchange and contribute \$5 million to the improvement to improve the I-80/SR 65 interchange.</p>	Caltrans, Lead Agency	During Tier 2 design and analysis. Implementation may extend beyond completion of Tier 2.
4.8.4	<p>Mitigation Consideration, Fiddymment Road: Under 2040 conditions, all alternatives for Placer Parkway would add traffic to Fiddymment Road north of the future Blue Oaks Boulevard and cause a significant impact on the LOS of this roadway segment. The following strategies were identified to mitigate the LOS impacts on this segment of Fiddymment Road:</p> <ul style="list-style-type: none"> <li>• Provide adequate lanes at the Fiddymment Road/Blue Oaks Boulevard and Fiddymment Road/North Hayden Parkway intersections.</li> <li>• Widen Fiddymment Road to six lanes between Blue Oaks Boulevard and the</li> </ul>	Lead Agency, SPRTA	During Tier 2 design and analysis. Implementation may extend beyond completion of Tier 2.



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Measure Number	Task and Brief Description	Responsible Entity	Timing
	<p>Roseville City limits.</p> <ul style="list-style-type: none"> <li>• Construct an interchange on Placer Parkway at Watt Avenue.</li> <li>• Identify fair-share contributions for new development that would contribute traffic to Fiddymment Road to help fund improvements to Fiddymment Road.</li> </ul> <p>Based on discussions with the City of Roseville, the segment of Fiddymment Road between Blue Oaks Boulevard and the Roseville city limits was assumed to have four lanes under all scenarios. A segment-based analysis suggests a widening of this segment to six lanes to mitigate the LOS impact. However, Roseville's LOS policy focuses on the operations of signalized intersections during the p.m. peak hour at buildout of the City's entitled land uses. Construction of adequate turn lanes at the intersections of Fiddymment Road/Blue Oaks Boulevard and Fiddymment Road/North Hayden Parkway may provide LOS C conditions without the need for a widening of this segment to six lanes.</p> <p>Since this segment of Fiddymment Road would not have a significant LOS impact if an interchange is constructed on Placer Parkway, this interchange could be considered as a mitigation measure.</p> <p>The growth in traffic demand on Fiddymment Road will stem from development over portions of Roseville, Lincoln, and unincorporated Placer County. Traffic impact fees on this new development are a potential source of funding for improvements to Fiddymment Road. To adequately spread the cost of improvements on a fair-share basis, a mechanism such as a multijurisdictional Joint Powers Authority that covers portions of several jurisdictions, would need to be established. Placer County and the City of Roseville have established a Joint Powers Authority that covers portions of those jurisdictions to fund certain roadway improvements in west Placer County, including Fiddymment Road and Walerga Road.</p>		
4.8.5	<p>Mitigation Consideration, Whitney Ranch Parkway: Under 2040 conditions, all of the corridor alignment alternatives for Placer Parkway would add traffic to Whitney Ranch Parkway between SR 65 and University Avenue and would cause a significant impact on the LOS of this roadway segment. The following strategies were identified to mitigate the LOS impacts on this segment of Whitney Ranch Parkway:</p> <ul style="list-style-type: none"> <li>• Widen Whitney Ranch Parkway to eight lanes west of University Avenue.</li> <li>• Identify fair-share contributions for new development that would contribute</li> </ul>	Lead Agency, SPRTA	During Tier 2 design and analysis. Implementation may extend beyond completion of Tier 2.

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	<p>traffic to Whitney Ranch Parkway to help fund improvements to Whitney Ranch Parkway.</p> <p>The growth in traffic demand on Whitney Ranch Parkway will stem from development in portions of the cities of Rocklin and Lincoln as well as unincorporated Placer County. Traffic impact fees on this new development are a potential source of funding for improvements to Whitney Ranch Parkway. The City of Rocklin has development fees for roadway improvements. The SPRTA adopted the Regional Transportation and Air Quality Mitigation fee, which assesses new development for impacts on specified regional transportation facilities. One of these projects is to widen SR 65 between I-80 and Twelve Bridges Drive. In 2009, Placer County and the cities of Lincoln, Rocklin, and Roseville adopted a Tier II MOA fee program which includes \$480 million to fund the Placer Parkway. This funding will include improvements for the SR 65/Parkway/Whitney Ranch Parkway interchange and contribute \$5 million to the improvement to improve the I-80/SR 65 interchange.</p>		
4.8.6	<p>Mitigation Consideration, Valley View Parkway: Under 2040 conditions, all of the corridor alignment alternatives for Placer Parkway would add traffic to Valley View Parkway and would cause a significant impact on the LOS of this roadway segment. The following strategies were identified to mitigate the LOS impacts on this segment of Valley View Parkway:</p> <ul style="list-style-type: none"> <li>• Provide adequate turn lanes at the Valley View Parkway/Sierra College Boulevard and Valley View Parkway/Park Drive intersections.</li> <li>• Widen Valley View Parkway to four lanes.</li> <li>• Identify “fair share” contributions for new development that would contribute traffic to Valley View Parkway to help fund improvements to Valley View Parkway.</li> </ul> <p>Based on input from the City of Rocklin, Valley View Parkway through the Clover Valley area of Rocklin was assumed to have two lanes under all scenarios. A segment-based analysis suggests a widening of this segment to four lanes to mitigate the LOS impact. However, the intersections along Valley View Parkway/Sierra College Boulevard would have relatively low traffic volumes on its cross streets. Due to those conditions, the daily capacity of this segment may be greater than those used for this analysis. Construction of adequate turn lanes at the intersections of Valley View Parkway/Sierra College Boulevard and Valley View Parkway/Park Drive may provide LOS C conditions without the need for a widening of this segment to four lanes.</p>	Lead Agency, SPRTA	During Tier 2 design and analysis. Implementation may extend beyond completion of Tier 2.

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	<p>The growth in traffic demand on Valley View Parkway will stem from development in portions of Rocklin and unincorporated Placer County. Traffic impact fees on this new development are a potential source of funding for improvements to Valley View Parkway. The City of Rocklin has development fees for roadway improvements. To spread the cost of improvements on a fair-share basis to portions of both Rocklin and unincorporated Placer County, some mechanism, such as a multi-jurisdictional Joint Powers Authority that covers portions of Rocklin and unincorporated Placer County, would need to be established.</p>		
4.8.7	<p>Mitigation Consideration, Sierra College Boulevard: Under 2040 conditions, all corridor alignment alternatives for Placer Parkway would add traffic to Sierra College Boulevard between the future Valley View Parkway (in the proposed Clover Valley area of Rocklin) and English Colony Way and would cause a significant impact on the LOS of this roadway segment. The following strategies were identified to mitigate the LOS impacts on this segment of Sierra College Boulevard:</p> <ul style="list-style-type: none"> <li>• Provide adequate turn lanes at the Sierra College Boulevard/Valley View Parkway and Sierra College Boulevard/English Colony Way intersections.</li> <li>• Widen Sierra College Boulevard to six lanes between Valley View Parkway and English Colony Way.</li> <li>• Identify fair-share contributions for new development that would contribute traffic to Sierra College Boulevard to help fund improvements to Sierra College Boulevard.</li> </ul> <p>The segment of Sierra College Boulevard between Valley View Parkway and English Colony Way was assumed to have four lanes under all scenarios. A segment-based analysis suggests a widening of this segment to six lanes. However, the intersections along Sierra College Boulevard are T intersections, with relatively low traffic volumes on its cross streets. Due to those conditions, the daily capacity of this segment may be greater than those used for this analysis. Construction of adequate turn lanes at the intersections of Sierra College Boulevard/Valley View Parkway and Sierra College Boulevard/English Colony Way may provide LOS C conditions without the need for a widening of this segment to six lanes.</p> <p>The growth in traffic demand on Sierra College Boulevard will stem from development over a wide area. Traffic impact fees on this new development are a potential source of funding for improvements to Sierra College Boulevard. The SPRTA currently collects</p>	Lead Agency, SPRTA	During Tier 2 design and analysis. Implementation may extend beyond completion of Tier 2.

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	traffic impact fees for various improvements to regional roadways in south Placer County, including widening this section of Sierra College Boulevard to four lanes. Additional improvements to this section of Sierra College Boulevard could be incorporated into the SPRTA fees.		
4.8.8	Mitigation Consideration, Sierra College Boulevard: As discussed in Section 4.8.3, Alternative 5 would result in a less than desirable radius in one location (near the intersection of the planned extensions of Watt Avenue and Blue Oaks Boulevard) if the ultimate design places Placer Parkway along the northerly side (or inside) of the corridor alignment's curve. If the Parkway is located on the northerly side of the 1,000-foot-wide corridor, the actual centerline radius of the Parkway would be approximately 1,000 feet less than the desired design standard and 700 feet less than the Caltrans' recommended minimum radius for urban freeways. To avoid an impact on the project's design standards, the Parkway should be located along the southerly side (outside) of the corridor alignment's curve in this location.	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
<b>9. Air Quality</b>			
4.9.1	Mitigation Commitment: No open burning of removed vegetation will be allowed during infrastructure improvements. Vegetative material will be chipped and delivered to waste to energy facilities, or to an appropriate disposal site.	Project Proponent (contracting phase); Construction Contractor (during construction)	Specify as part of construction contract documents. Implement during construction.
4.9.2	Mitigation Commitment: If it is not possible to maintain a distance of 500 feet or more between the edge of the Parkway and any sensitive air receptors (see Section 4.9.3.4), then Feather River Air Quality Management District (FRAQMD) and Placer County Air Pollution Control District (PCAPCD) will be consulted to determine the need for a health risk assessment. If a health risk assessment is performed and risks exceed the accepted standards, mitigation will be implemented as appropriate to reduce risks to an acceptable level, and will include consideration of relocations if necessary.	Project Proponent	During Tier 2 design and analysis.
4.9.3	Mitigation Commitment: Environmental reports prepared for proposed development projects, such as specific and community plans, that are in close proximity to the Parkway (i.e., 500 feet or less) will be reviewed. As appropriate, Placer County Transportation Planning	Lead Agency	During Tier 2 design and analysis.

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	<p>Agency (PCTPA) will request, via comments on such documents, that potential detrimental health risks posed to individuals living near the corridor are considered, and that local jurisdictions add policies to their development review process or general plans that require assessment of air toxics for projects within 500 feet of the Parkway. PCPTA will also request that, before a city, county, special district or school district approves a project that would place sensitive receptors (e.g., children, the elderly, and hospitals) within 500 feet of the selected corridor, an analysis of potential air toxic contaminants be conducted to determine whether mitigation strategies are needed as part of the proposed use, or if the location is not appropriate for such a use. This supplemental analysis would provide information regarding the potential health risks to exposed individuals. Since Placer Parkway would likely be constructed within a 500- to 1,000-foot-wide corridor, unless the size of the buffer is adjusted as described in Section 2.2.4.1 at the bottom of page 2-9 of the Draft Tier 1 EIS/EIR, development projects could be at least 500 feet from the roadway depending on the location of the roadway within the corridor, in which case it is possible that no additional assessment would be required.</p>		
4.9.4	<p>Mitigation Commitment: A dust control plan will be prepared and implemented, and will address the minimum Administrative Requirements found in Regulation 3.16, <i>Fugitive Dust Emissions</i> (FRAQMD, 2006) and Section 400 of <i>District Rule 228, Fugitive Dust</i> (PCAPCD, 2006). Additional details of dust control strategies are provided in the Placer Parkway Air Quality Technical Memorandum. Dust control strategies will include using appropriate measures to prevent dust and dirt from contaminating offsite areas and controlling dust to prevent air quality and water contamination from inactive construction areas.</p>	<p>Project Proponent (contracting phase); Construction Contractor (during construction)</p>	<p>Specify as part of construction contract documents. Implement during construction.</p>
4.9.5	<p>Mitigation Commitment: Prior to construction, the contractor will be required to provide FRAQMD and PCAPCD with a comprehensive inventory of construction equipment and anticipated construction timeline.</p>	<p>Project Proponent (contracting phase); Construction Contractor (during construction)</p>	<p>Specify as part of construction contract documents. Implement during construction.</p>
4.9.6	<p>Mitigation Commitment: Construction equipment and vehicles will be maintained so that exhaust emissions shall not exceed <i>District Rule 202 Visible Emission</i> limitations. Operators of vehicles and equipment found to exceed opacity limits are to be</p>	<p>Project Proponent (contracting phase);</p>	<p>Specify as part of construction contract documents. Implement</p>

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	immediately notified and the equipment must be repaired within 72 hours. An Applicant representative that is certified by the California Air Resources Board (CARB) to perform VEE shall routinely evaluate project-related off-road and heavy-duty on-road equipment emissions for compliance with this requirement.	Construction Contractor (during construction)	during construction.
4.9.7	Mitigation Commitment: Idling time for diesel-power equipment will be minimized to 5 minutes or less for all diesel-power equipment.	Project Proponent (contracting phase); Construction Contractor (during construction)	Specify as part of construction contract documents. Implement during construction.
4.9.8	Mitigation Consideration: During Tier 2 design, consideration will be given to aligning the Parkway within the selected corridor to maximize the distance between the roadway's edge and any sensitive air receptors (see Section 4.9.3.4).	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.9.9	Mitigation Consideration: Where possible, alternative power sources (e.g., power poles) and fuel will be used to operate equipment instead of using diesel-powered equipment. If existing sources are not available, low sulfur fuel will be used for diesel power generators.	Project Proponent (contracting phase); Construction Contractor (during construction)	Specify as part of construction contract documents. Implement during construction.
4.9.10	Mitigation Consideration: Where possible, alternative fuel such as aqueous or emulsified diesel fuel will be used for all equipment to reduce oxides of nitrogen (NO <sub>x</sub> ) and diesel exhaust emissions.	Project Proponent (contracting phase); Construction Contractor (during construction)	Specify as part of construction contract documents. Implement during construction.
4.9.11	Mitigation Consideration: Within Tier 2 design, consideration will be given to the strategic placement of trees near roadways (in accordance with FHWA and Caltrans guidance) to	Project Proponent	During Tier 2 design and analysis.

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	enhance pollutant dispersal and provide shading to reduce diurnal hydrocarbon emissions.		
4.9.12	Mitigation Consideration: Construction will comply with all relevant California Air Pollution Control District rules and policies, and all grading codes and construction air quality policies designed to limit idling and construction equipment emissions, including ozone precursor emission controls, preparation of diesel emission reduction plans, requirements for use of CARB-certified equipment for post combustion controls, and compliance with state construction vehicle emission standards, etc.	Project Proponent (contracting phase); Construction Contractor (during construction)	Specify as part of construction contract documents. Implement during construction.
<b>10. Noise</b>			
4.10.1	Mitigation Commitment: PCTPA will request that jurisdictions require that applicants for development proposals that may be affected by traffic patterns associated with the Parkway perform a noise impact study as part of their environmental review process, using the projected traffic volumes in the Parkway traffic report (DKS Associates, 2007) to assess the potential for exceedances of the land use compatibility noise thresholds identified in their general plans. PCPTA will recommend that jurisdictions should work to avoid such exceedances in their planning processes so as to avoid costly mitigation in the future.	Lead Agency	During Tier 2 design and analysis.
4.10.2	Mitigation Commitment: To minimize construction noise, the following construction noise control strategies will be required to be implemented by the contractor: <ul style="list-style-type: none"> <li>• Minimize nighttime and weekend work.</li> <li>• Use portable noise screens to provide shielding for jack hammering or other similar activities when work is close to the hotels.</li> <li>• Compliance with Caltrans' Standard Specifications 7-1.011 (July 1999) "Sound Control Requirements." The contractor shall comply with all local sound control and noise level rules, regulations, and ordinances that apply to any work performed pursuant to the contract. Each internal combustion engine, used for any purpose on the job or related to the job, should be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine should be operated on the project without said muffler.</li> </ul>	Project Proponent (contracting phase); Construction Contractor (during construction)	Specify as part of construction contract documents. Implement during construction.
4.10.3	Mitigation Consideration: Potential noise abatement strategies identified in the Caltrans policy (Caltrans, 1998) include the following:	Project Proponent,	During Tier 2 design and analysis.

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	<ul style="list-style-type: none"> <li>• Avoiding the project impact by using design alternatives, such as altering the horizontal and vertical alignment of the project.</li> <li>• Constructing noise barriers.</li> <li>• Acquiring property to serve as a buffer zone.</li> <li>• Using traffic management strategies to regulate types of vehicles and speeds.</li> <li>• Acoustically insulating public use or nonprofit institutional structures.</li> </ul>	Lead Agency	
4.10.4	Mitigation Consideration: PCTPA would consider the use of noise barriers to abate noise impacts on sensitive receptors. The reasonableness of this noise mitigation strategy and the criteria for determining it would be guided by Caltrans policy.	Lead Agency	During Tier 2 design and analysis.
<b>11. Hydrology and Floodplains</b>			
4.11.1	<p>Mitigation Commitment: Tier 2 design will include the following strategies to reduce potential hydrological and floodplain impacts:</p> <ul style="list-style-type: none"> <li>• Limitation of temporary disturbance to minimum areas necessary for construction and restoration of disturbed areas to pre-project conditions.</li> <li>• Avoidance and/or minimization of construction activities in or near creeks and floodplains, including limiting amount of fill placed in creeks.</li> <li>• Use of the least intrusive construction methods reasonably available.</li> <li>• Design of project features (e.g., culverts, drainage systems, and bridges) to avoid increasing flow velocities that may cause or contribute to downstream erosion and flooding and minimize potential for debris clogging that could cause flooding. Bridges and columns will be designed such that increase in the BFE will be less than one foot as specified by the Federal Emergency Management Agency (see Section 3.1 Placer Parkway Hydrology and Floodplains Technical Report (URS, 2007b).</li> <li>• Use of structural runoff controls, such as vegetated swales.</li> <li>• Incorporation of appropriate best management practices (BMPs) (e.g., provided appropriate detention and use vegetation to reduce flow velocities and peak discharges).</li> <li>• Maximization of the angle of stream crossing to as close to 90° as possible.</li> <li>• Implementation of Caltrans/Sutter County/Placer County BMPs as described in</li> </ul>	Project Proponent (during design and contracting phases); Construction Contractor (during construction)	Implement design strategies during Tier 2 design and analysis; implement construction requirements during construction.



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	<p>the Caltrans Statewide Stormwater Management Plan.</p> <ul style="list-style-type: none"> <li>• Compliance with standard conditions in the form of regulatory requirements of federal, state and local agencies including Sutter County, Placer County Flood Control and Water Conservation District, and Reclamation District 1000 requirements for siting and design of facilities and hydrologic modification and floodplain encroachment guidance and siting/design guidance from FHWA, USCOE, Caltrans, and CDFG.</li> </ul>		
4.11.2	<p>Mitigation Consideration: Tier 2 design would consider, where possible, implementation of the following strategies to reduce potential impacts on hydrology and floodplains:</p> <ul style="list-style-type: none"> <li>• Avoidance or minimization of stream crossings.</li> <li>• Alignment of the roadway within the corridor to decrease impervious cover by reducing the area of pavement or number of road miles.</li> <li>• Provision of sufficient setback distances in accordance with Caltrans and county requirements between the highway right-of-way and wetlands or riparian areas.</li> <li>• Location of the Parkway and bridges away from sensitive areas and establish buffer zones.</li> <li>• Mimic natural patterns as much as possible, including considering Low Impact Development whenever appropriate.</li> </ul>	Project Proponent	During preliminary engineering as part of Tier 2 analyses.
4.11.3	<p>Mitigation Consideration: PCTPA will evaluate the potential use of an expansion of the City of Roseville retention basin as part of mitigation for the Parkway. Such an expansion would require City of Roseville approval and additional environmental review.</p>	Project Proponent, Lead Agency	During Tier 2 design and analysis.
4.11.4	<p>Mitigation Consideration: PCTPA will identify and address, as needed, Pleasant Grove Creek/Curry Creek Watershed Management Groups' requirements.</p>	Project Proponent, Lead Agency	During Tier 2 design and analysis.
4.11.5	<p>Mitigation Consideration: Objectives from the Pleasant Grove/Curry Creek Ecosystem Restoration Plan may be relevant and should be considered during planning, design, and construction of Placer Parkway.</p>	Project Proponent, Lead Agency	During Tier 2 design and analysis.
<b>12. Water Quality</b>			
4.12.1	<p>Mitigation Commitment: Compliance with standard conditions in the form of regulatory requirements of federal, state and local agencies including compliance with National</p>	Project Proponent	Implement design strategies during Tier 2

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	<p>Pollutant Discharge Elimination System (NPDES) requirements and Sutter and Placer county ordinances during Parkway construction and operations with respect to the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and BMPs to prevent erosion, control runoff, reduce roadway and vehicle pollutants from entering watercourses; and prevention of pollution discharge off site. Additional details of these strategies are included in the Placer Parkway Water Quality Technical Memorandum. Specific strategies would include:</p> <ul style="list-style-type: none"> <li>• Meeting Sutter and Placer county, and Reclamation District No. 1000 requirements for siting and design of facilities.</li> <li>• Pursuant to the Phase II NPDES General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems, the Parkway also must incorporate long-term, post-construction BMPs and monitoring to protect water quality and control runoff. Projects in Placer County must currently comply with these requirements. To comply with federal and state Clean Water Act requirements, local agencies may be required to adhere to Low Impact Development (LID) principles to protect water quality in the interest of fish and wildlife. LID strategies that integrate BMPs to protect water quality may also reduce runoff. Compliance with the applicable Caltrans and county NPDES Stormwater Permits; includes preparation and implementation of a Water Quality Management Plan.</li> <li>• Compliance with the NPDES General Construction Activity Stormwater Permit; includes preparation and implementation of an SWPPP.</li> <li>• Compliance with the applicable Sutter and Placer county ordinances that require Erosion and Grading Plans.</li> </ul>	(during design, permitting, and contracting phases); Construction Contractor (during construction)	design and analysis; implement construction requirements during construction.
4.12.2	Mitigation Commitment: If the Parkway involves discharge or places fill material into navigable water or wetlands, an application for a Section 404 permit must be submitted to the USCOE. This permit is required to ensure that discharge will not violate water quality standards.	Project Proponent	During Tier 2 design and analysis.
4.12.3	Mitigation Commitment: If the Parkway requires realignment of streams, which may include installation of culverts in streams, a Streambed Alteration agreement must be obtained from CDFG.	Project Proponent	During Tier 2 design and analysis.
4.12.4	Mitigation Commitment: In the event that during detailed design the need arises for	Project	During Tier 2 design

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	dewatering during construction, the PCTPA will file an application for the Dewatering and Low Threat Discharges to Surface Waters Permit, Order No. 5-00-175 (NPDES CAG995001).	Proponent	and analysis.
4.12.5	Mitigation Commitment: The Caltrans Stormwater Quality Handbook (Caltrans, 2003a) Statewide Stormwater Management Plan (Caltrans, 2003b), and other Caltrans reference documents identify permanent and temporary BMPs that have been approved for statewide application and which must be considered during the planning and design process. Details of these BMPs are provided in the Placer Parkway Water Quality Technical Memorandum.	Project Proponent	During Tier 2 design and analysis.
4.12.6	Mitigation Consideration: To offset the increased volume of runoff created by the Parkway, the Parkway proponents could contribute to an expansion of the Reason Farms Regional Retention Basin. PCTPA will evaluate the potential use of an expansion of this retention basin as part of mitigation for the Parkway. Such an expansion would require City of Roseville approval and additional environmental review. PCTPA would also incorporate additional mitigation facilities to minimize run-off in areas outside of the Roseville Basin.	Lead Agency	During Tier 2 design and analysis.
4.12.7	Mitigation Consideration: PCTPA will identify and address, as needed, Pleasant Grove Creek/Curry Creek Watershed Management Groups' requirements. Objectives from the Pleasant Grove/ Curry Creek Ecosystem Restoration Plan may be relevant and should be considered during planning, design, and construction of Placer Parkway.	Project Proponent, Lead Agency	During Tier 2 design and analysis.
4.12.8	<p>Mitigation Consideration: Tier 2 design would consider, where possible, implementation of the following strategies to reduce potential impacts on water quality:</p> <ul style="list-style-type: none"> <li>• Limitation of disturbance during construction to minimize impacts, particularly near creeks, wetlands and vernal pool complexes, including limiting amount of fill placed in creeks, wetlands, or vernal pool complex areas and restoring disturbed areas to minimize erosion.</li> <li>• Locating the roadway to avoid or minimize impacts to streams and ecologically sensitive areas (e.g., wetlands and vernal pool complex areas).</li> <li>• Avoidance or minimization of stream crossings.</li> <li>• Consideration of bridges or viaducts across stream crossings where the angle of the crossing is 45 degrees or less.</li> </ul>	Project Proponent, Lead Agency	During Tier 2 design and analysis.

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	<ul style="list-style-type: none"> <li>• Consideration of the use of a combination of a viaduct/conventional highway in the western part of the Parkway.</li> <li>• Alignment of the roadway within the corridor to decrease impervious cover by reducing the area of pavement or number of road miles.</li> <li>• Provision of sufficient setback distances in accordance with Caltrans and county requirements between the highway right-of-way and wetlands or riparian areas.</li> <li>• Location of the Parkway and bridges away from sensitive areas and establish buffer zones.</li> <li>• Mimic natural patterns as much as possible, including considering LID whenever appropriate.</li> <li>• Locate the alternative as low in the watershed as possible, to minimize the area affected.</li> <li>• Design project features to avoid direct discharge of roadway runoff that may contain pollutants into streams and other sensitive sites (e.g., wetlands and vernal pool complex areas).</li> <li>• Use of structural runoff controls, such as vegetated swales.</li> <li>• Obtaining floodplain easements on private land adjacent to the Parkway in order to provide potential detention/retention facilities to mitigate excessive runoff and provide flood control.</li> <li>• Identify and address, as needed, Natomas Basin Habitat Conservation Plan (NBHCP)'s Requirements, including ensuring that stormwater runoff from the Parkway should not be discharged directly into habitat areas of special-status species (see the Placer Parkway Water Quality Technical Memorandum for further details).</li> </ul>		
<p><b>13. Soils, Geology, and Seismicity</b> Because no soil, geology, and seismicity impacts are identified, no mitigation strategies have been recommended for Tier 1 or Tier 2.</p>			
<p><b>14. Biology Resources</b></p>			
4.14.1	<p>Mitigation Commitment: Mitigation Strategy under the Natomas Basin Habitat Conservation Plan (NBHCP): Mitigation strategy for the Natomas Basin area will include a combination of avoidance, minimization, and compensation. To meet the mitigation</p>	Project Proponent	As early as possible to maximize habitat credit and minimize temporal

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	goals of the NBHCP, a mitigation fee is paid to the NBHCP by developers of projects when they apply for building permits. The NBHCP then uses the mitigation fees to acquire, restore, and manage mitigation lands to provide habitat for protected species and maintain agriculture in the basin (NBC, 2006). The required fees will be paid to the NBHCP to mitigate for Parkway impacts to special-status species in the NBHCP service area.		loss, but no later than initiation of construction.
4.14.2	Mitigation Commitment: For project components outside of the area permitted for development under the NBHCP, negotiations with the USFWS will be undertaken to amend the NBHCP or provide such other compensation as would meet the intent of the NBHCP with respect to protection of special-status species in the NBHCP service area.	Project Proponent	Identify amendment or compensation during Tier 2 analyses; implement compensation prior to construction.
4.14.3	Mitigation Commitment: Tier 2 design would implement the following strategies to reduce potential impacts on biological resources: <ul style="list-style-type: none"> <li>• Avoidance or minimization of stream crossings.</li> <li>• Alignment of the roadway within the corridor to avoid sensitive resources, and provision of buffer zones, including provision of sufficient setback distances in accordance with Caltrans and county requirements between the highway right-of-way and wetlands or riparian areas.</li> <li>• A site-specific assessment of this impact would be implemented during the Tier 2 evaluation when the actual limits of the proposed project are defined. Where feasible the project will be designed to minimize adverse impacts to the size, quality, or connectivity of adjacent vernal pool complexes by maintaining appropriate setbacks for ground-disturbing impacts, constructing culverts and drainage features for the future roadway to minimize changes to the natural hydrology or degradation of water quality in adjacent wetlands. If indirect effects cannot be substantially avoided or minimized, the project proponent would implement mitigation consistent with the strategies described in other Mitigation Measures, below.</li> </ul>	Project Proponent	During Tier 2 design and analysis.
4.14.4	Mitigation Consideration: Mitigation strategy for impacts to areas within Sutter County but not in the Natomas Basin: This would include a combination of avoidance, minimization, and compensation. Strategies to avoid and minimize potential impacts would include scheduling construction activities to minimize disturbance during sensitive life cycle phases of wildlife	Project Proponent (during Tier 2 analyses,	Identify feasible avoidance and minimization during Tier 2 analysis. Identify

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(Continued)**

Measure Number	Task and Brief Description	Responsible Entity	Timing
	species; monitoring construction activities to limit disturbance, vegetation removal, and habitat damage; and implementing an environmental awareness training program for all construction personnel. In keeping with the strategy presented in <i>Eco-Logical</i> (Brown, 2006), compensation would include some combination of habitat preservation, restoration, and creation developed in coordination with federal, state, and local agencies with the goal of protecting larger, connected habitat rather than protecting fragmented areas of a single resource.	permitting, and contracting phases); Construction Contractor (during construction)	compensation during Tier 2 analyses; implement compensation prior to construction; implement construction requirements during construction.
4.14.5	Mitigation Consideration: Mitigation for impacts to vernal pool species would be consistent with the Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. Existing USFWS and CDFG mitigation guidelines for giant garter snake, Valley elderberry longhorn beetle, and Swainson's hawks would be used.	Project Proponent	Identify feasible avoidance and minimization during Tier 2 analysis. Identify compensation during Tier 2 analyses; implement compensation prior to construction.
4.14.6	<p>Mitigation Consideration: Mitigation strategy under the proposed Placer County Conservation Plan (PCCP): The PCCP is currently under development and the timing of its completion is uncertain, but one of its goals to use regional opportunities to build on existing or planned conservation efforts. The conceptual mitigation for Placer Parkway is consistent with the goals of the PCCP, and may use (if available) its established mechanisms for conservation. At the same time, conceptual mitigation for Placer Parkway must provide for suitable alternatives should the PCCP not be functional in time to serve this project's mitigation needs.</p> <p>Under either scenario, the avoidance and minimization of impacts is the preferred strategy for Placer Parkway, as identified in <i>Eco-Logical</i> guidance from the U.S. Department of Transportation (Brown, 2006). Consistent with the <i>Eco-Logical</i> strategy, required mitigation will be implemented so that it would complement and expand existing conservation and open space areas in the Parkway vicinity. A number of opportunities for restoration and conservation are identified in the draft Ecosystem Restoration Plan for the Pleasant Grove Creek and Curry Creek watersheds (Foothill Associates, 2005).</p> <p>If the PCCP is approved, it would likely require mitigation based on acres of undeveloped</p>	Project Proponent	Identify feasible avoidance and minimization during Tier 2 analysis. Identify compensation during Tier 2 analyses; implement compensation prior to construction.

**Appendix D**  
**Mitigation Monitoring and Reporting Program**  
**Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/Environmental Impact Report**  
**(Continued)**

Measure Number	Task and Brief Description	Responsible Entity	Timing
	lands that are developed rather than on a habitat-specific basis. Two options to compensate for Parkway impacts are under consideration: in-lieu fee payment, or acquisition of conservation lands by the project developer. Both of these options would provide conservation of larger, consolidated areas of land that are consistent with the Eco-Logical approach advocated by Brown (2006).		
4.14.7	Mitigation Consideration: Mitigation strategy for impacts in the absence of the PCCP: This mitigation strategy would be based upon the mitigation guidelines presented in <i>Eco-Logical</i> (Brown, 2006). This strategy would include a combination of avoidance, minimization, and compensation. Compensation would include some combination of habitat preservation, restoration, and creation developed in coordination with federal, state, and local agencies. Compensation areas would be selected based on several criteria reflecting habitat value and regulatory and planning parameters. Compensatory habitat mitigation in the absence of the PCCP would be implemented according to the strategies outlined for Placer County in the Natural Environment Study.	Project Proponent	Identify feasible avoidance and minimization during Tier 2 analysis. Identify compensation during Tier 2 analyses; implement compensation prior to construction.
4.14.8	Mitigation Consideration: For project components outside of the area permitted for development under the NBHCP, negotiations with the USFWS will be undertaken to amend the NBHCP or provide such other compensation as would meet the intent of the NBHCP with respect to protection of special-status species in the NBHCP service area.	Project Proponent	Identify amendment or compensation during Tier 2 analyses.
<b>15. Hazardous Materials</b>			
4.15.1	Mitigation Commitment: All buildings and other structures proposed for demolition would be surveyed for the presence of LBP and ACM. Any such LBP and/or ACM should be appropriately abated by a certified contractor prior to demolition and disposed of in accordance with federal, state, and local regulations.	Project Proponent	Surveys conducted prior to issuance of any grading or disturbance permits; removal and remediation in conjunction with project activities.

**Appendix D**  
**Mitigation Monitoring and Reporting Program**  
**Placer Parkway Corridor Preservation Tier 1 Environmental Impact Statement/Environmental Impact Report**  
**(Continued)**

<b>Measure Number</b>	<b>Task and Brief Description</b>	<b>Responsible Entity</b>	<b>Timing</b>
4.15.2	Mitigation Commitment: Potentially impacted soils proposed for excavation associated with potential RECs, e.g., Tenco Tractor, Rio Bravo Power Plant, and three uncontrolled dump sites, will be tested for appropriate analytes and handled in accordance with regulatory standards.	Project Proponent	Testing conducted prior to issuance of any grading or disturbance permits; handling in conjunction with project activities.
4.15.3	Mitigation Commitment: Current agricultural soils and former undisturbed agricultural soils that are proposed for excavation during construction will be tested for pesticides and other contaminants and disposed of in accordance with federal, state, and local regulations.	Project Proponent	Testing conducted prior to issuance of any grading or disturbance permits; disposal in conjunction with project activities.
4.15.4	Mitigation Commitment: A Health and Safety Plan will be prepared by the contractor prior to construction. This plan will describe appropriate procedures to follow in the event that any contaminated soil or groundwater is encountered during construction activities. Any unknown substances should be tested, handled, and disposed of in accordance with appropriate federal, state, and local regulations.	Construction Contractor	Prior to construction.
4.15.5	Mitigation Consideration: The Parkway should be located, if feasible, so as to avoid disturbance of the five potential RECs identified in this Tier 1 EIS/EIR (see Section 4.15.4.3)	Project Proponent	During Tier 2 design and analysis.
4.15.6	Mitigation Consideration: An ADL (aerially deposited lead) investigation should be conducted along unpaved shoulders adjacent to highways and roads in high traffic areas that will be disturbed during construction activities. The only locations where traffic is heavy enough to warrant an ADL investigation (when peak monthly Average Daily Traffic exceeded 10,000 vehicles in 1985; 1985 was the last year when leaded gasoline was sold in the United States) would be the intersections of the Parkway and SR 65 in the east and SR 70/99 in the west; Caltrans will likely have completed an ADL site investigation at the above intersections a few years before the Parkway is constructed (Chadha, 2006).	Project Proponent	Surveys conducted prior to issuance of any grading or disturbance permits; removal and remediation in conjunction with project activities.
<b>16. Energy</b> Because no energy impacts are identified, no mitigation strategies have been recommended for Tier 1 or Tier 2.			



## References

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**APPENDIX E**  
**FINAL TIER 1 SECTION 4(f) EVALUATION**



**APPENDIX E**  
**FINAL TIER 1 SECTION 4(f) EVALUATION**  
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Figure E-1 Reclamation District 1000 Historic District



## 1.0 INTRODUCTION

The purpose of this report is to evaluate potential impacts to resources protected under Section 4(f) of the Department of Transportation Act of 1966, now codified at 49 U.S. Code 303(c), that may be associated with the proposed transportation improvement project referred to as Placer Parkway, located in south Sutter and southwestern Placer counties, California. The project (including location, maps and planning history) is described in detail in Chapter 2 of the Placer Parkway Corridor Preservation Final Tier 1 Environmental Impact Statement (EIS).

## 2.0 SECTION 4(f) APPLICABILITY

Section 4(f) of the Department of Transportation Act of 1966 declares it is “the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites.” To this end, Section 4(f) permits the Secretary of Transportation to approve a transportation program or project that would “use” land from a significant publicly owned public park, recreation area, or wildlife or waterfowl refuge, or land from a significant historic site (regardless of ownership), only if there is no “prudent and feasible alternative” to using that land and all possible planning has been done to minimize harm to the park, recreation area, wildlife or waterfowl refuge, or historic site resulting from the use.

In general, a project may “use” land from a 4(f) resource in one of three ways:

1. By permanently incorporating 4(f) land into a transportation facility,
2. By temporarily occupying 4(f) land in a way that is adverse in terms of the statute's preservationist purposes (23 Code of Federal Regulations [C.F.R.] 774.13(d)), or
3. By constructively using 4(f) land; that is, causing proximity impacts to a 4(f) resource so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired (23 C.F.R. 774.15).

If a project alternative would avoid 4(f) resources and be prudent and feasible to construct, then it must be selected. If no prudent and feasible avoidance alternative exists, the Federal Highway Administration (FHWA) must select the alternative that would cause the least overall harm to 4(f) resources. In cases where all project alternatives would cause substantially the same harm to 4(f) resources, FHWA may select any alternative it chooses.

This Tier 1 Section 4(f) Evaluation has been prepared in conjunction with the Tier 1 Environmental Impact Statement for the Placer Parkway Corridor Preservation Project. The FHWA’s regulations implementing Section 4(f) recognize that –

An analysis required by Section 4(f) may involve different levels of detail where the section 4(f) involvement is addressed in a tiered EIS.

(1) When the first-tier, broad-scale EIS is prepared, the detailed information necessary to complete the Section 4(f) approval may not be available at that stage in the development of the action. In such cases, the documentation should address the potential impacts that a proposed action will have on Section 4(f) property and whether those impacts could have a bearing on the decision to be made. A preliminary Section 4(f) approval may be made at this time as to whether the impacts resulting from the use of a Section 4(f) property are de minimis or whether there are feasible and prudent avoidance alternatives. This preliminary approval shall include all possible planning to minimize harm to the extent that the level of detail available at the first-tier EIS stage allows. It is recognized that such planning at this stage may be limited to ensuring that opportunities to minimize harm at subsequent stages in the development process have not been precluded by decisions made at the first-tier stage. This preliminary Section 4(f) approval is then incorporated into the first-tier EIS.

(2) The Section 4(f) approval will be finalized in the second-tier study. If no new Section 4(f) use, other than a de minimis impact, is identified in the second-tier study and if all possible planning to minimize harm has occurred, then the second-tier Section 4(f) approval may finalize the preliminary approval by reference to the first-tier documentation. Re-evaluation of the preliminary Section 4(f) approval is only needed to the extent that new or more detailed information available at the second-tier stage raises new Section 4(f) concerns not already considered.

(3) The final Section 4(f) approval may be made in the second-tier CE, EA, final EIS, ROD or FONSI.

23 CFR.774.7(e)

The following analysis has been undertaken in compliance with this regulatory provision.

### **3.0 DESCRIPTION OF SECTION 4(f) PROPERTY**

Reclamation District 1000 occupies more than 55,130 acres of land and consists of a historic system of drainage canals, pumps, levees, ditches, pumping plants, and a system of access roads. It is currently managed by the Bureau of Reclamation. In 1994, Reclamation District 1000 was determined eligible for the National Register of Historic Places.

South Sutter County and the greater Sacramento area were historically vulnerable to seasonal flooding events. In the nineteenth century, various attempts were made to address this problem through the construction of levees and installation of river gauges to monitor water levels. In spite of these efforts, agricultural activities in the south Sutter County area in the late nineteenth century were limited to grazing, with some farming on higher ground areas. Early in the twentieth century, the state legislature began a series of new reclamation efforts. In 1911, the legislature created Reclamation District 1000, which later became part of the Sacramento Valley Flood Control Project.

The Natomas Consolidated Company used large-scale earth moving and gold-dredging equipment to transform the Reclamation District 1000 area into productive agricultural land. Its activities included construction of the Natomas East Main Drainage Canal, parallel to the Western Pacific (now Southern Pacific) railroad tracks, as well as construction of a 60-mile network of roads to provide access to drainage canals for construction and maintenance. The company then subdivided and leased large acreage blocks for wheat and grain crop production, thus establishing a pattern of large-acreage, predominately single crop agricultural land use in the area. The Reclamation District 1000 road system provided access to the farm parcels within the district's new subdivisions. The original two-lane dirt roads, which were paved with macadam or concrete during the 1920s and 1930s, generally followed the township and section survey lines and drainage canals to delineate the large, regularly spaced agricultural parcels (JRP Historical Consulting, 2006).

The State Office of Historic Preservation has concurred that the Reclamation District 1000 rural historic landscape historic district is significant within the context of reclamation and flood control activity in the Sacramento Valley during the early twentieth century, because Reclamation District 1000 was one of the first large, modern reclamation districts in the state and it was the largest reclamation project in the country at the time of its inception. It provided flood control security and facilitated the creation of large areas of land that could be farmed much more productively. The levees, canals, and road system built by Natomas Consolidated Company helped shape the spatial land use pattern of the district. Reclamation District 1000 also served the goals of the region-wide early twentieth century Sacramento Flood Control Project, the result of more than six decades of legislation and technical studies that provided the legal, institutional, and engineering framework to achieve flood control along the Sacramento River. The Sacramento Flood Control Project supported improved navigation along the river, as well as land reclamation for agricultural use and other development. Reclamation District 1000 and its landscape features are considered representative of this important historical trend, including the emergence of modern corporations as land managers and developers in reclamation districts. The historic district's primary contributing features are its drainage system, road system, and large-scale land patterns (JRP Historical Consulting, 2006).

#### **4.0 POTENTIAL IMPACTS ON SECTION 4(f) PROPERTY**

All of the project corridor alignment alternatives would impact Reclamation District 1000 (see Figure E-1) in the Western Segment, from State Route (SR) 70/99 to the drainage canal. The northerly corridor alignment alternatives (Alternatives 4 and 5) would impact 268.3 acres, while the southerly alignments (Alternatives 1, 2, and 3) would impact 363.2 acres of land that lie within the boundaries of this historic district. The roadway ultimately constructed within this corridor, however, would impact considerably less land, since the road surface would occupy a maximum width of 350 feet within the 500-foot corridor in this area. A new roadway would affect landscape features within Reclamation District 1000, although this area is part of the Sutter Pointe Specific Plan of Sutter County that has been approved for urban development. Some of the Sutter Pointe mixed use development that has been approved for this area is likely to be completed before Placer Parkway construction would begin, as discussed in Chapters 3 and 7 of the Community Impact Assessment. Impacts to specific features such as ditches, canals, and pumping facilities would be identified and mitigated once a specific roadway alignment is selected within the preserved future corridor.



Three properties were identified that appear to retain sufficient integrity to warrant formal evaluation during the Tier 2 phase of the proposed action (JRP, 2006). These resources are Assessor's Parcel Number (APN) 35-260-011, which is within the Alternative 3 corridor alignment, APN 35-260-014, which is immediately south of the corridor alignment for Alternatives 1, 2, and 3, and APN 017-130-036, which is within the Alternative 2 corridor alignment.

## 5.0 AVOIDANCE ALTERNATIVES

The No-Build Alternative would avoid impacts to Reclamation District 1000; however, this alternative would not meet the project purpose and need. Minor corridor alignment adjustments would not avoid or minimize impacts to Reclamation District 1000, since it extends north to south throughout the western end of the study area (see Figure E-1), and the proposed roadway is an east-west facility. If the Western Segment of the Parkway were to be located to the north of the existing study area, avoiding Reclamation District 1000, this would result in a facility of considerably greater length than currently proposed. This would also result in out of direction travel and consequentially a substantial increase in vehicle miles traveled, as the facility would have to connect with SR 70/99 several miles to the north, and part of the Parkway would therefore be located several miles farther away from the areas in south Sutter County it is intended to serve, compared to the existing build alternatives. Extending the corridor along the northern portion of the study area (thus reducing the length of out of direction travel) was examined (URS Corporation and DKS Associates, 2004). This alternative was rejected because it would not sufficiently meet the project purpose and need (i.e., it would not attract enough vehicles to reduce local roadway congestion in southwest Placer County), and because it would directly affect numerous vernal pool and wetland areas totaling approximately 306 acres, which would not likely result in permit approval from the Wildlife Agencies. Also, it would substantially affect prime farmland in Sutter County, which would be an important economic factor for that area. This alternative would also have greater environmental impacts due to the out of direction travel, including impacts on traffic and air quality.

Other major corridor alignment alternatives such as tunneling or bridging would be prohibitively expensive and/or technically infeasible, because of the distances involved (approximately 4 miles of the Parkway are currently proposed within Reclamation District 1000), and because of its location within a floodplain, and in any case, in this situation an interchange to SR 70/99 would still be required within the Reclamation District 1000 boundaries. If the facility were to be constructed to the south of Reclamation District 1000, it would require a diversion of more than 10 miles in order to avoid the district, which is not prudent in terms of construction costs or in meeting travel demand. This location would also not provide for any connections to the local roadway network in Sutter County, and so would not contribute to the advancement of economic development in the county, which is one of the major purposes of the Parkway.

During Tier 2 roadway alignment selection and design, coordination and planning can occur to identify and avoid or minimize impacts to specific Reclamation District 1000 facilities such as ditches, canals, or pumping equipment in coordination with the Bureau of Reclamation.

## 6.0 MEASURES TO MINIMIZE HARM

Planning and design efforts of the project to date have incorporated numerous measures to minimize harm to 4(f) resources, including:

- Elimination of corridor alternatives with unacceptably high impacts from further consideration. Such impacts included potential effect on known historic resources, and anticipated impacts on special-status species habitats, wetlands, and conservation areas (see Section 2.5 of the Placer Parkway Corridor Preservation Draft EIS/EIR for additional details);
- Inclusion of buffer areas along the proposed Parkway to help preserve open space and agricultural activities;
- Inclusion of plans to maintain the integrity of existing canals, pumping facilities, ditches and local roadways within Reclamation District 1000; and
- Coordination and consultation with local planning agencies to reduce the potential for cumulative impacts to protected resources.
- Preparation of a Memorandum of Agreement in concert with the Office of Historic Preservation would occur during the Tier 2 process if there is an adverse effect to a historic property. The Memorandum of Agreement is a document prepared under Section 106 that outlines specific avoidance, minimization, and mitigation measures.

The project alignment alternatives have been designed through a concurrent planning process that has included extensive consultation with appropriate resource agencies and iterative consideration of environmental impacts, including impacts to the facilities and features (such as canals and roadways) that are contributing elements to the Reclamation District 1000 historic district. Additional measures to minimize harm to Reclamation District 1000 will be identified through coordination and consultation between FHWA/California Department of Transportation (Caltrans) and the Bureau of Reclamation, as described below. With the exception of the first bullet, above, which is complete, all measures to minimize harm to 4(f) resources listed here will be addressed again and documented in the Tier 2 process, including the Tier 2 Section 4(f) Evaluation.

## 7.0 COORDINATION

FHWA/Caltrans has coordinated and consulted with the State Office of Historic Preservation during preparation of the Historic Resources Evaluation Report and with other resource agencies and local jurisdictions through a consultative planning process aimed at selecting feasible corridor alignment alternatives that minimize environmental impacts and meet project purpose and need. During the Tier 2 process, consultation with the official with jurisdiction will occur, including consultation with the Bureau of Reclamation to obtain their concurrence on findings and to identify additional strategies for avoiding or minimizing potential project impacts on Reclamation District 1000 resources.

The public had an opportunity to comment on the findings of the Section 4(f) analysis through circulation of the draft environmental document prepared for the project. No comments regarding Section 4(f) were received.

## **8.0 POTENTIAL FUTURE 4(f) RESOURCES IN THE STUDY AREA**

Several proposed (but not yet approved or adopted) development plans include provisions for proposed future parks and recreation facilities that could be affected by project corridor alignment alternatives, as described below. While these parks and recreational facilities are not Section 4(f) resources at this time, they would become 4(f) resources once the plans were formally adopted, and the newly designated parks transferred to public ownership.

Additionally, two projects that could be affected by project corridor alignment alternatives were approved since publication of the Draft Tier 1 EIS/EIR in 2007: the Regional University Specific Plan (RUSP) and the Sutter Pointe Specific Plan (SPSP). Permits have not yet been obtained and no construction has taken place. These two projects are in the early design stage for development. It is too early to determine the exact location for the future-planned recreational or park areas that would be part of these development plans. If a planned Section 4(f) resource is affected by the preferred corridor alignment then the prudence and feasibility of avoidance alternatives would be analyzed under a Tier 2 environmental document.

Future development in the project study area, including conceptual planning for future parks and recreation facilities, is being planned within a context that includes development of the Parkway. Placer Parkway is noted as a conceptual alignment on numerous major adopted plans, including the Placer County General Plan, the Metropolitan Transportation Plan and the Regional Transportation Plan, as well as Sacramento Area Council of Governments' Preferred 2020 Blueprint Scenario. These planning documents provide notice to other agencies of the plans for a future Placer Parkway. Thus, conceptual planning for the Parkway has preceded conceptual planning for the other resources discussed below. Nonetheless, once they are formally designated, publicly owned recreation facilities or wildlife and waterfowl refuges would become resources that would be protected under the provisions of Section 4(f). Section 4(f) protection would apply to such facilities if they are adopted prior to formal adoption and preservation of a Placer Parkway corridor.

Each identified potential and/or planned but not yet constructed future 4(f) resource is briefly discussed below. The discussion, based on the limited information available, includes, where feasible, the location, status, concurrent planning efforts, and potential for avoidance of the resource.

### *Reason Farms Retention Basin*

Future proposed uses of the City of Roseville's Reason Farms Retention Basin include certain recreational uses such as picnicking, hiking, horseback riding, and model airplane flying. The City of Roseville held public workshops in the spring of 2006 to obtain community input on the concept master plan for the Retention Basin and continued to modify the conceptual plan for the Retention Basin based on input received from the public and from the Park and Recreation

Commission. A Final Supplemental EIR on the master plan is on hold because of fiscal constraints.

It is evident that the City of Roseville is considering the Placer Parkway concept in its planning for the Retention Basin, as indicated by the Placer Parkway corridor concept line shown on the current Master Plan (Figure 5-3). Placer County Transportation Planning Agency (PCTPA) has been coordinating planning efforts with city staff to ensure that project design is compatible with facilities being planned for the Retention Basin. At this time, recreational uses are generally planned for the central area of the Retention Basin, away from the southeastern area where the Placer Parkway would cross the property. Until the plan is finalized, the location of specific recreation facilities will not be confirmed.

#### *Regional University Specific Plan*

The Alternative 1 alignment would affect the eastern periphery of the approved RUSP, within which low- and medium-density residential development is planned, with a community park and open space areas. The Alternative 2 corridor alignment would also impact an area of the RUSP that includes a community park and open spaces.

#### *Sierra Vista Specific Plan*

The Alternative 1 alignment would affect the the northwestern section of the proposed Sierra Vista Specific Plan (SVSP) area, which is currently proposed as Urban Reserve. This area contains wetlands and is bounded on the north and south by designated open space; potentially this area would be developed as open space in the future, but currently it is not planned as a Section 4(f) property (i.e., a publicly owned wildlife or waterfowl refuge).

#### *Sutter Pointe Specific Plan*

Alternative alignments 1, 2, and 3 would affect a planned park in the southeastern portion of the approved SPSP in Sutter County. The Alternative 4 and 5 alignments would not affect any planned Section 4(f) properties in the SPSP. They were included in the planning for the SPSP, including a local roadway circulation pattern to address users of the current Sankey Road.

#### *Wildlife Refuges Created by Placer County Conservation Plan*

It is possible that new refuges could be designated through the ongoing efforts of the Placer County Conservation Plan (PCCP), a proposed Habitat Conservation Plan/Natural Communities Conservation Plan in the Placer County portion of the study area, as described in Draft Tier 1 EIS/EIR Section 3.1.4.4. However, the PCCP is being developed in concert with adopted local and regional plans that include Placer Parkway, and this concurrent planning will reduce conflicts between uses, and reduce the possibility of use of a 4(f) resource. In addition, the process of defining Parkway alternatives has taken into consideration sensitive resources such as vernal pool complexes and riparian habitat, in order to avoid or minimize potential impacts on these resources early in the planning process and to be consistent with resource agency guidance relative to habitat plans. Avoidance of these resources (as well as continued concurrent planning efforts) is likely to minimize potential use of any future-designated wildlife refuge or park.

## 9.0 LEAST HARM ANALYSIS AND CONCLUDING STATEMENT

If there is no feasible and prudent avoidance alternative, FHWA “may approve only the alternative that causes the least overall harm in light of the statute’s preservation purpose.” The “least overall harm” is determined by balancing the following list of factors:

- a. Ability to mitigate adverse impacts to each Section 4(f) resource;
- b. Relative severity of the remaining harm, after mitigation, to the protected activities and attributes or features (document even if harm is substantially equal);
- c. Relative significance of each Section 4(f) property;
- d. Views of the officials with jurisdiction over each Section 4(f) property;
- e. Degree to which each alternative meets the purpose and need;
- f. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
- g. Substantial differences in costs among alternatives.

See 23 CFR 774.3(c).

Based upon the information available at the Tier 1 stage, Alternatives 4 and 5 would likely result in the least harm to actual or potential Section 4(f) resources, because:

- Alternatives 4 and 5 would affect the least amount of land in Reclamation District 1000 – up to 268.3 acres, while Alternatives 1, 2, and 3 would impact up to 363.2 acres of land that lie within the boundaries of this historic district. No feasible mitigation is available that would still enable the Parkway meet the purpose and need of the project, for the reasons described in Section 5.0 above.
- Alternatives 4 and 5 would not conflict with any potential Section 4(f) properties planned or currently proposed as part of future land development, including possible future parks/recreational resources and/or wildlife refuges. The corridor alignments for Alternatives 1, 2, and 3 might have the possibility to affect the following planned Section 4(f) land uses:
  - the eastern periphery of the approved RUSP, within which low- and medium-density residential development is planned, with a community park and open space areas (Alternative 1);
  - an area of the eastern portion of the RUSP that includes a community park and open spaces (Alternative 2); and,
  - a planned park in the southeastern portion of the approved Sutter Pointe Specific Plan (Alternatives 1, 2, and 3).
- The corridor alignment for Alternatives 4 and 5 avoids the three potentially NRHP-eligible properties that could be affected by the other alternatives, i.e.:
  - APN 017-130-036 (Alternative 2 would affect this parcel)

- APN 35-260-011 (Alternative 3), and
- APN 35-260-014 Alternatives 1, 2, and 3 would affect this parcel)
- Costs to build Alternatives 4 and 5 would be less than for Alternatives 1, 2, or 3 because of the length of the roadway, fewer interchanges, and less impacts on biological resources requiring costly mitigation. Detailed cost estimates are not available at the Tier 1 stage.

Alternative 5 with a no-access buffer has been identified as the Preferred Alignment in the Placer Parkway Corridor Preservation Final Tier 1 EIS/EIR. Alternative 5 affects only one known Section 4(f) resource – Reclamation District 1000. Based upon the information available at this stage, FHWA has made a preliminary decision that there is no feasible and prudent alternative that would avoid the use of land from Reclamation District 1000 by project-level alignments located within the Alternative 5 corridor. In addition, the Preferred Alignment includes all possible planning to minimize harm resulting from such future project-level use at the Tier 1, broad scale level of analysis.

In order to build Placer Parkway within the preferred corridor alignment, more specific design details will be pursued as part of the Tier 2 effort. These design details or minor shifts of the roadway alignment within the preferred corridor would be examined in a Section 4(f) Tier 2 analysis to determine whether these alternatives meet purpose and need, or present any other unique or unusual factors as they relate to safety and operational issues, social, economic, environmental impacts, or community disruption.

At the subsequent Tier 2 level, if it is determined that there are no prudent and feasible alternatives that avoid all Section 4(f) properties, a least harm analysis will be prepared, which would include all possible planning to minimize harm, at the time when more design details become available.

The preliminary Section 4(f) approval would be subject to a re-evaluation if new or more detailed information became available at the second-tier stage. The final Section 4(f) approval may be made in the second-tier Final EIS.

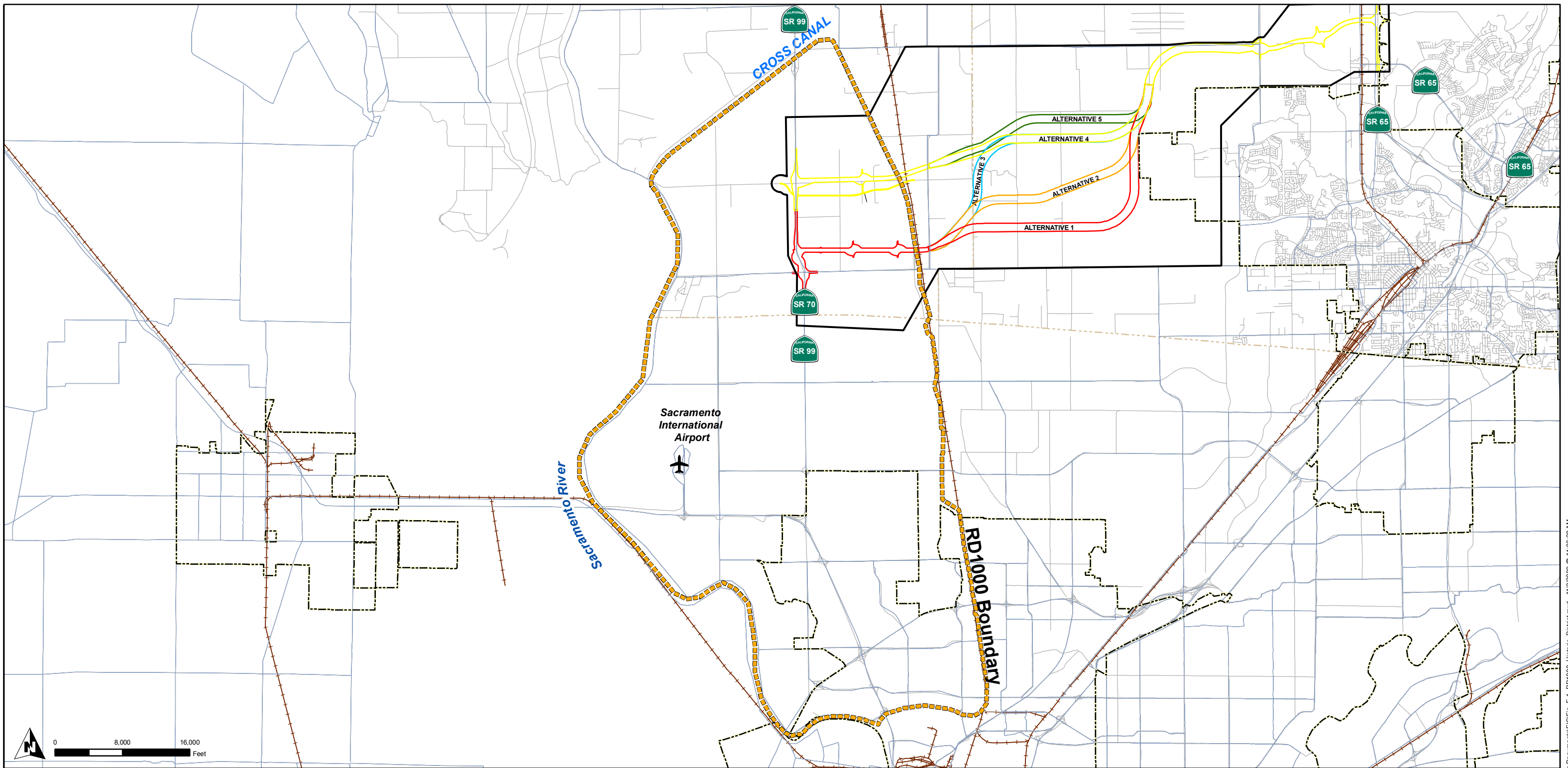
## **10.0 REFERENCES**

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Source: URS

- County Boundary
- Railroads
- RD1000 Boundary
- Alternative 1
- Alternative 2
- Alternative 3
- Alternative 4
- Alternative 5
- Project Study Area Boundary



TIER 1 EIS/EIR

## Reclamation District 1000 Historic District

Figure E-1

November 2009