

## **CHAPTER 2**

---

# **Response to Comments on the Draft EIR**

## **Introduction**

Individual responses to each of the comment letters received on the Draft EIR are included in this chapter. Individual responses to each of the comment letters received on the Recirculated Draft EIR are included in Chapter 3. Comments that do not directly relate to the analysis in this document (i.e., that are outside the scope of this document) will be considered, but may not be given specific responses. However, all comments are identified in this chapter so that the City of Lincoln Planning Commission and City Council will know the opinions of the Commenters.

In some cases, multiple comments were received with respect to several planning and/or environmental issues raised in the Draft EIR. In order to provide Commenters with a complete picture regarding the concern raised, the City prepared a master response regarding particular subjects. These master responses provide some background regarding the issue, identify how the issue was addressed in the Draft EIR, and provide additional explanation to address the Commenters' concerns. In some cases, these master responses have also been prepared to address specific land use or planning concerns (i.e., requests for land use/zoning changes, etc.) related to the Proposed Project but unrelated to the EIR or environmental issues associated with the Proposed Project. Comments that present opinions about the project unrelated to environmental issues or that raise issues not directly related either to the substance of the EIR, the General Plan Update, or to environmental issues are noted without a detailed response.

## **Response to Comments**

The following responses correspond to the numbers for each comment presented in Chapter 5 "Comments on the Draft and Recirculated Draft EIR." The section begins with the master responses that have been prepared to address multiple comments related to a single given subject.

## **Master Responses**

### **Master Response #1: Comments Specific to the General Plan Update Concepts and Policies**

During the public review period for the Draft EIR, several Commenters provided comments requesting clarification on several of the planning concepts (i.e., policy revisions, etc.) provided in the City's Updated General Plan. This master response addresses these comments, including but not limited to, individual comments: A-28, B-2, F-6, F-10, F-32, F-48, G-7, G-10, G-13, H-1,

H-3, I-1, I-4, K-2, N-2, P-1, Y-1, BB-1, FF-1, FF-2, GG-1, HH-1, OO-1, PP-1, PP-3, RR-1, SS-1, TT-4, TT-5, TT-8, TT-9, WW-2, WW-5, WW-11, WW-12, WW-13, AAA-1, BBB-1, CCC-1, GGG-1, JJJ-1, KKK-1, MMM-1, NNN-1, OOO-1, PPP-1, QQQ-1, SSS-1, TTT-1, UUU-1, VVV-1, and WWW-1.

The primary objective of this Final EIR is to respond to comments received during the public review period that address concerns specific to the adequacy of the Draft EIR analysis. Specific comments directed at the Draft 2050 General Plan, such as requested changes to or clarifications of general plan goals, policies, actions, or standards, are not considered comments on the adequacy of the Draft EIR analysis and, in most cases, responses are not included in this Final EIR. However, these comments have been identified and reviewed by City staff.

## **Master Response #2: Programmatic Nature of the EIR**

Several commenters on the Draft EIR request additional impact analysis regarding specific developments that may occur through implementation of the Draft 2050 General Plan. Additionally, several others commented that the Draft 2050 General Plan does not establish a set of specific and exact design criteria for each Village that would allow for a project-level analysis of impacts on natural and biological resources. This master response addresses these comments, including, but not limited to, the following individual comments: A-14, A-20, A-21, A-23, A-24, A-27, A-28, A-29, A-30, A-31, E-1, F-5, F-26, F-30, F-34, F-37, F-43, F-44, F-51, G-6, G-7, G-13, G-17, O-2, O-3, Q-1, V-2, V-7, V-9, V-19, V-20, V-21, V-24, V-25, YYY-1, and DDDD-16.

The Draft 2050 General Plan is a long range planning document that encompasses over 49 square miles within its planning boundaries, with approximately 19 square miles of that Planning Area within the current City limits. The long range population and job forecast for the Sacramento region, developed by the Sacramento Area Council of Governments (SACOG), indicates that the region will add approximately 1.7 million new residents and 1.1 million new jobs by the year 2050. The City, working in conjunction with the SACOG Blueprint effort, is planning for a similar horizon and will accommodate a portion of the region's projected growth that corresponds to the City's objectives. There is, obviously, a significant amount of vacant land that will be developed over the 50-year planning horizon of the Draft 2050 General Plan. The City's approach to guiding development within its current and proposed sphere of influence is to create a framework of principles and policies that will direct urbanization, in terms of its design, the preservation of natural resources, the need for public facilities, and the fiscal and economic implications of development.

As a means of guiding urbanization, the City established policies and guidelines in its Draft 2050 General Plan for seven "Villages" and three "Special Use Districts." The Villages and Special Use Districts do not have specific land uses assigned to parcels. Rather, the Draft 2050 General Plan establishes general densities and intensities of land use and a set of policies that will guide how urbanization will be designed in terms of the natural and man-made constraints as well as in achieving sustainable and smart growth development. The "Village" areas are the basic building blocks for major new development in the Planning Area along with the Special Use Districts. The "Villages" range in size from 680 to 3,200 acres, with the average being 2,000 acres in size. The

Special Use Districts vary in size from 1,844 to 2,114 acres, with the average being a little over 1,900 acres. Additionally, the Draft 2050 General Plan establishes policies that require the preparation, and City approval, of a Specific Plan before any development can occur within each one of those areas. Those policies, Policy LU-15.1 and Policy LU-16.1, provide as follows:

- **Policy LU-15.1 Village Specific Plans/General Plan Amendment.** The City shall require the completion and approval of a specific plan and associated General Plan Amendment prior to development of land within an area designated as a Village. *[New Policy]*
- **Policy LU-16.1 Development Area Specific Plans.** The City shall require the completion and approval of a specific plan to guide future development within the designated SUD. *[New Policy]*

At a minimum, a Specific Plan must be developed for the entire Village or Special Use District. This approach will allow for a flexible and comprehensive planning effort that is responsive to the variety of field conditions found throughout the Draft 2050 General Plan planning boundaries.

The City's Draft 2050 General Plan establishes several Goals, Goals OSC-1, OSC-4 and OSC-5 that are designed to protect and enhance the natural open space areas and streams within the Planning Area. These goals are supported by a series of General Plan policies (OSC-1.1 through OSC-1.5, OSC-4.1 through OSC-4.6, and OSC-5.1 through OSC-5.12), which will be the basis for developing future Specific Plans and guiding the manner in which each Specific Plan will address open space and biological resources. Those General Plan policies provide as follows:

- **Policy OSC-1.1 Protect Natural Resources.** The City shall strive to protect natural resource areas, fish and wildlife habitat areas, scenic areas, open space areas and parks from encroachment or destruction by incompatible development. *[Modified Existing Policy 1, Open Space, Conservation and Recreation Element]*
- **Policy OSC-1.2 Coordinate with Placer County for Open Space Preservation.** The City shall coordinate with Placer County and their Placer Legacy program to ensure City issues are incorporated into future plans. *[New Policy]*
- **Policy OSC-1.3 Creation of Buffers.** In new development areas, the City shall encourage the use of open space or recreational buffers between incompatible land uses. *[New Policy]*
- **Policy OSC-1.4 100-year Floodplains.** The City will apply open space designations to all lands located within the 100 year floodway as shown on the FIRM panel or as determined by a project drainage plan and approved by the City Engineer/Director of Public Works; The City will also apply open space designations to all 100-year floodplain fringe areas, and/or remaining floodplain fringe encroachment areas, and quantifying their impact along with other improvements to show a zero (0) net impact to the upstream, downstream and adjacent properties. Open space designations will apply to all land within a minimum of 50 feet from the center channel of all perennial and

- intermittent streams and creeks providing natural drainage, and to areas consisting of riparian habitat. In designating these areas as open space, the city is preserving natural resources and protecting these areas from development. *[Modified Existing Action Plan Policy 1, Open Space, Conservation and Recreation Element]*
- **Policy OSC-1.5 Protection of Minerals.** The City will protect mineral resources such as groundwater, clay deposits, as well as groundwater recharge areas from urban development. *[Existing Action Plan Policy 5, Open Space, Conservation and Recreation Element]*
  - **Policy OSC-4.1 Identify and Protect Aquifers.** The City shall identify and protect, in cooperation with Placer County and the Placer Legacy Open Space Program, local aquifers and water recharge areas. *[Modified Existing Policy 2, Open Space, Conservation and Recreation Element]*
  - **Policy OSC-4.2 Develop Groundwater Management Plan.** The City shall develop and periodically update a groundwater management plan to protect local aquifers. *[New Policy]*
  - **Policy OSC-4.3 Protect Surface Water and Groundwater.** The City shall ensure that new development projects do not degrade surface water and groundwater. *[New Policy]*
  - **Policy OSC-4.4 Protection and Management of Flood Plains.** The City shall encourage the protection of 100 year floodplains and where appropriate, obtain public easements for purposes of flood protection, public safety, wildlife preservation, groundwater recharge, access and recreation. *[New Policy]*
  - **Policy OSC-4.5 Use of Reclaimed Water.** The City shall encourage the use of reclaimed water, in place of treated potable water for landscaping and other suitable applications. *[Existing Policy 12, Open Space, Conservation and Recreation Element]*
  - **Policy OSC-4.6 Best Management Practices.** The City shall continue to require the use of feasible and practical best management practices (BMPs) to protect surface water and groundwater from the adverse effects of construction activities and urban runoff. Additionally, the City shall require, as part of its Storm Water NPDES Permit and ordinances, to implement the Pollution Prevention Plan (SWPPP) during construction activities for any improvement projects, new development and redevelopment projects for reducing pollutants to the maximum extent practicable. *[Revised Policy – Draft EIR Analysis]*
  - **Policy OSC-5.1 Protect Significant Vegetation.** The City shall support the preservation of heritage oaks and threatened or endangered vegetative habitat from destruction. *[Modified Existing Policy 5, Open Space, Conservation and Recreation Element]*
  - **Policy OSC-5.2 Management of Wetlands.** The City shall support the management of wetland and riparian plant communities for passive recreation, groundwater recharge, and wildlife habitats. Such communities shall be restored or expanded, where possible and as appropriate. *[New Policy]*

- **Policy OSC-5.3 Placer Legacy Open Space and Conservation Program.** The City will continue to coordinate with Placer County and the Placer Legacy Open Space and Conservation Program to protect habitat areas that support endangered species and other special-status species. *[New Policy]*
- **Policy OSC-5.4 Encourage Planting of Native Vegetation.** The City shall encourage the planting of native trees, shrubs, and grasslands in order to preserve the visual integrity of the landscape, provide habitat conditions suitable for native vegetation, and ensure that a maximum number and variety of well-adapted plants are maintained. *[New Policy]*
- **Policy OSC-5.5 New Development in Sensitive Areas.** The City shall require that new development in areas that are known to have particular value for biological resources be carefully planned and where possible avoided so that the value of existing sensitive vegetation and wildlife habitat can be maintained. *[New Policy]*
- **Policy OSC-5.6 No Net Loss of Wetlands.** The City will maintain a policy of no net loss of wetlands on a project-by-project basis, which may include an entire specific plan area. For the purpose of identifying such wetlands, the City will accept a map delineating wetlands which has been accepted by the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act of 1972. The term "no net loss" may include mitigation implemented through participation in an off-site mitigation bank or similar mitigation mechanism acceptable to the City and permitting agencies. *[Modified Existing Policy, Public Facilities Element]*
- **Policy OSC-5.7 404 Permit Requirements.** The City may require project proponents to obtain 404 Permits, and prepare mitigation plans for, or provide for the avoidance, preservation, and maintenance of identified wetlands prior to submitting applications for land use entitlements. *[Existing Policy, Public Facilities Element]*
- **Policy OSC-5.8 Corps of Engineers Disclaimers.** The City may, but need not, accept a Corps of Engineers disclaimer of any jurisdiction over any project of a Corps of Engineers 404 permit as the City's own plan for the achievement of a project's no net loss of wetlands. *[Modified Existing Policy, Public Facilities Element]*
- **Policy OSC-5.9 Wetlands Dedication.** All preserved wetlands shall be dedicated to the City or a non-profit organization acceptable to the City and preserved through perpetual covenants enforceable by the City or other appropriate agencies, to ensure their maintenance and survival. With respect to areas dedicated to the City, acceptance shall be conditioned upon establishment of a lighting and landscaping district or other public or private funding mechanisms acceptable to the City. *[Modified Existing Policy, Public Facilities Element]*
- **Policy OSC-5.10 Native Vegetation for Landscaping.** The City shall develop a list of native vegetation to be used as a landscape pallet for use within open space/preserve areas. Native plants should also be incorporated into plant palettes used in developed areas by citizens and developers. *[New Policy]*

- **Policy OSC-5.11 Requirement for Biological Studies.** Prior to project (i.e., specific plan or individual project) approval, the City shall require a biological study to be prepared by a qualified biologist for any proposed development within areas that contain a moderate to high potential for sensitive habitat. As appropriate, the study shall include the following activities: (1) inventory species listed in the California Native Plant Society Manual of California Vegetation, (2) inventory species identified by the USFWS and CDFG, (3) inventory special status species listed in the California NDDDB, and (4) field survey of the project site by a qualified biologist. *[Revised New Policy - Draft EIR Analysis]*
- **Policy OSC-5.12 Appropriate Mitigation Measures.** The City shall consider using appropriate mitigation measures for future projects (i.e., specific plans or individual projects) based on mitigation standards or protocols adopted by the applicable statute or agency (e.g., USFWS, CDFG, etc.) with jurisdiction over any affected sensitive habitats or special status species. *[New Policy – Draft EIR Analysis]*

At this stage, it would be impractical for the City to establish a single set of specific design criteria to preserve biological resources in the General Plan policies. Such design standards would not be based upon any of the specific field conditions found in each of the seven Villages or the three Special Use Districts. Nor would these standards be weighed against the particular design objectives of a Village or Special Use District. Further, such criteria may not be appropriate to address the specific field conditions for biological resource conservation in each of the Villages, as such criteria could be either under- or over-inclusive, depending on the physical conditions and the particular biological resources. For example, some 100-year flood areas are in excess of 2,000 feet from the centerline of the waterway while other areas are considerably narrower. Rather than using a one-size-fits-all methodology, the development of specific design criteria, including the design standards that will implement the Open Space and Conservation Element policies of the Draft 2050 General Plan will occur during the review of the required Specific Plan for each Village and Special Use District and the environmental review associated with the Specific Plan. Policy OSC-5.11 requires site specific biological studies for all projects within areas that contain moderate to high potential for sensitive habitat. At that stage, policy-makers will have more detailed information about the resources within a Village or Special Use District and the measures appropriate to achieving the City's open space goals as well as achieving other General Plan goals for the community. Of course, in all cases, compliance with the General Plan policies will be required.

The CEQA Guidelines (Section 15168(a)) allow a local agency to prepare a Program level EIR to address a series of actions that can be characterized as one large project or series of actions, that are linked geographically, are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program, or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The EIR for the Draft 2050 General Plan has been prepared as a Program EIR and as such serves as a first-tier document that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site-specific environmental review will be required to assess future projects implemented under the program. As Specific Plans for each of the Villages or Special Use Districts are planned, the City will evaluate each project to determine the extent to which this EIR covers the

impacts of the project and to what extent additional environmental analysis may be required for the proposed Specific Plan. Consequently, comments or requests for a project-level analysis of specific environmental issues at this stage are not appropriate. In the same vein, comments requesting specific design criteria or standards concerning biological and resource issues are not appropriate at this stage. Thus, comments regarding project-level analysis of specific environmental issues are identified but not addressed in this Program-level EIR but will be addressed in subsequent environmental documents. Also refer to Master Response #7.

In addition, the Implementation Measures for the General Plan expressly provide for the adoption of specific criteria for the protection of natural and cultural resources, for mitigation fees for habitat preservation and replacement, and for on-site habitat [i.e. the 40 percent open space requirement could provide adequate mitigation for habitat] (Implementation Policy Table 7-1).

Further, all of the future projects contemplated by the General Plan will be required to comply with both the State and Federal permitting regulations concerning biological resources. In addition, the City will utilize appropriate state and federal permitting regulations in developing mitigation measures for future projects (see Policy OSC-05.12.). As Specific Plans are developed for either a Village or Special Use District, more detailed information will be generated regarding the actual field conditions. This will allow for needed flexibility in terms of project design and for a more informed determination regarding issues such as the size and placement of buffers and the particular measures needed for preservation of natural habitat features within a Village or Special Use District. Given the variety of field conditions within each of the future development areas, pre-determining the most effective measures for any given setting would be speculative and not based upon any of the detailed information that will be acquired in the future concerning site resources and the design objectives of a project. During the development of the required Specific Plans for each of the Villages and Special Use Districts, detailed information will be provided to the decision-makers that will allow them to make informed determinations regarding the Goals and Objectives of the General Plan at a project specific level.

Thus, the General Plan provides for policies and implementation measures designed to provide policy guidance for development. Within the areas designated as Villages and Special Use Districts, no development can occur without the development and approval of a Specific Plan for the Village or District. At that time, through appropriate environmental review, specific standards and implementation measures will be imposed on the development.

### **Master Response #3: Comments Requesting Expansion of the Proposed Sphere of Influence**

Several Commenters on the Draft EIR request to have their specific properties included within the proposed Sphere of Influence for the City's Updated General Plan. This master response has been developed to address the following, but not limited to, individual comments: V-2, Y-1, JJ-1, CCC-1, and III-1.

The General Plan Steering Committee conducted 13 public workshops between February 2002 and August 2005 to provide direction on the Draft 2050 General Plan. This direction included

determining the study and/or Planning Area of the General Plan Update, which would become the Proposed Sphere of Influence. The Steering Committee at the August 2005 public workshop established the proposed General Plan boundaries to be analyzed in the Draft EIR (description provided on pages 2-1 and 2-2 of the Draft EIR and in Chapter 1 “Introduction” of this FEIR). The Draft EIR (see Figure 2-2 on page 2-4) also provides a map of the existing City Limits, Existing Sphere of Influence, and the Proposed Sphere of Influence. This figure is also provided in Chapter 1 of this FEIR.

The Draft EIR analyzed the potential environmental impacts of the Draft 2050 General Plan including the proposed Sphere of Influence. Through the Draft EIR public review process, the City received a number of comments requesting that specific properties be included (along with some to be excluded) in the proposed Sphere of Influence. The City does not intend to make substantial changes to the proposed Sphere of Influence. The City may make minor changes to the proposed Sphere of Influence if such changes would not result in significant environmental impacts.

#### **Master Response #4: Comments Requesting Rezoning of Specific Properties**

The City received a number of comments on the Draft EIR requesting that specific properties be rezoned. This master response has been developed to address the following, but not limited to, individual comments: FF-1, KK-1, OO-1, SS-1, BBB-1, GGG-1, KKK-1, MMM-1, NNN-1, OOO-1, PPP-1, QQQ-1, SSS-1, TTT-1, UUU-1, VVV-1, and WWW-1.

The purpose of this Draft 2050 General Plan update is to identify long-range boundaries that the City may develop between now and the year 2050. The Draft 2050 General Plan Update identifies the proposed City boundaries and identifies which new areas are designated as Villages or Special Use Districts. Each of these designated areas will be required to prepare a Specific Plan, which will identify individual land uses, infrastructure requirements, and a financing plan. To implement the Specific Plan, individual properties will be annexed and rezoned consistent with the Specific Plan land use designations when the property has access to the necessary infrastructure.

#### **Master Response #5: Comments Specific to Neighborhood Electric Vehicles (NEV)**

Several Commenters think that the Draft EIR does not provide sufficient reference or information related to the City’s current use of NEVs or the City’s recently adopted Neighborhood Electric Vehicle Transportation Plan. This master response has been developed to address the following, but not limited to, individual comments: A-15, S-1, T-1, U-1, V-2, V-6, X-1, BB-2, LL-1, UU-1, XX-1, YY-9, ZZ-1, DDD-1, and EEE-1.

For several years, the City has been working with the community to encourage and facilitate the local use of NEVs. Most recently, the City prepared the Neighborhood Electric Vehicle Transportation Plan, which was adopted by the Lincoln City Council in August 2006. The overall goal of the Neighborhood Electric Vehicle Transportation Plan is to provide sufficient guidance on the continued design and construction of signage striping, pavement, and charging stations required to facilitate NEV access from homes within the City of Lincoln to the downtown

Lincoln commercial area. As part of the plan, a city-wide map (see Figure 2-1) is included which identifies future designated NEV routes that would be incorporated (i.e., striped, signed, etc.) into existing local roadways. Because the City's Neighborhood Electric Vehicle Transportation Plan and the updated Draft General Plan both share a variety of goals and objectives designed to promote the use of alternative transportation modes and a reduction in toxic air quality emissions, the Draft 2050 General Plan includes the following policy (contained in the Transportation and Circulation Element):

- **Policy T-4.8 Neighborhood Electric Vehicles.** The City will support the use of Neighborhood Electrical Vehicles, (NEV) and similar vehicles by providing where possible for street classifications that provide for their use and the removal of restrictions to their use throughout the City. *[New Policy]*

The intent of this policy is to promote the importance of NEV use within the City and the City's continued dedication to supporting use of the NEV and support for the City's Neighborhood Electric Vehicle Transportation Plan. Based on the number of comments suggesting support of NEVs, City staff has recommended revising Policy T-4.8 as follows:

- **Policy T-4.8 Neighborhood Electric Vehicles.** ~~The~~ Through the implementation of the Neighborhood Electric Vehicle Transportation Plan, the City will shall support the use of Neighborhood Electrical Vehicles, (NEV) and similar vehicles by providing where possible for street classifications that provide for their use and the removal of restrictions to their use throughout the City. *[New Policy – Revised Final EIR]*

## Master Response #6: Comments Specific to the 40% Open Space Requirement

Several Commenters state that the Draft EIR does not provide sufficient background information on how the open space requirement was developed or defined in the Draft 2050 General Plan. This master response has been developed to address the following, but not limited to, individual comments: A-14, A-15, A-18, R-6, V-2, V-20, BB-1, II-2, TT-7, TT-9, TT-10, WW-3, WW-4, WW-16, WW-17, YY-8, HHH-12, DDD-3, and HHHH-5.

The General Plan Steering Committee discussed open space requirements at numerous workshops between February 2002 and August 2005. The Steering Committee at the April 2004 workshop recommended that each Village have 40% open space. The Steering Committee's recommendation for the 40% open space was based in large measure on the experience of recent large scale projects in the City that achieved a level of open space approximating 40%. The Committee determined that this level of open space represented a land use pattern that retained much of the natural attributes in our region that make it a desirable place to reside and work.

The Draft EIR in Chapter 4 "Land Use" provides land use tables entitled "Description of Land Uses Proposed for Village" for each Village. These tables starting on page 4-7 to 4-13 present the 40% open space requirement in acres proposed for each Village.

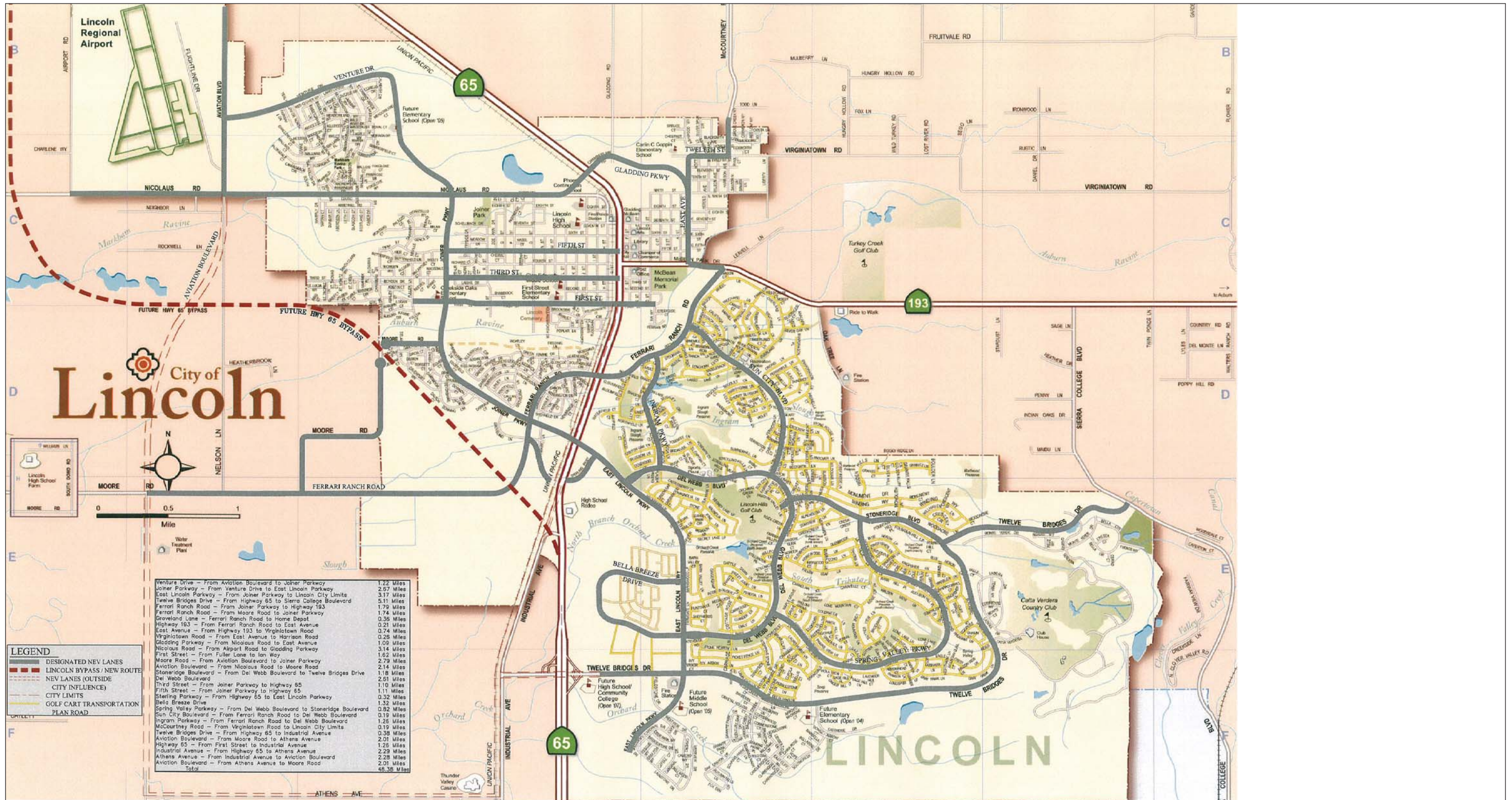
The Draft 2050 General Plan in Chapter 4 "Land Use" (see page 4-41) includes Policy LU-15.13, which presents the criteria or definition of open space as intended for use under the City's 40% open space requirement. This policy is also identified below:

- Policy LU-15.13 Interconnected / Usable Open Space.** Within each village or specific plan area, a minimum of 40 percent of the gross area will be reserved for open space. This open space will be identified in the required specific plan and secured from future development in a form acceptable to the City. The open space areas in a Village are defined using the following criteria. *[New Policy]*.

Criteria
<p>The following items <b>CAN</b> be used towards meeting the open space requirement:</p> <ul style="list-style-type: none"> <li>Public parks</li> <li>Public and private golf courses</li> <li>Natural areas to be permanently retained as open space, such as streams, floodways, wetlands, and other water features</li> <li>Land utilized for trails</li> <li>Land within buffer areas</li> <li>Land within utility corridors</li> <li>Land utilized for natural open space</li> </ul> <p>The following land areas <b>CAN NOT</b> be used towards meeting the open space requirement:</p> <ul style="list-style-type: none"> <li>Land owned by individual homeowners. Areas with a public access easement can be counted.</li> <li>Required roadway rights-of-way, including roadway medians.</li> <li>Areas in excess of required rights-of-way may be counted.</li> <li>Pocket parks</li> </ul>

### **Master Response #7: Comments Specific to the Future Requirement of Specific Plans for Villages and Special Use Districts (SUDs)**

Some Commenters believe that the Draft EIR does not provide sufficient information related to the requirements for future preparation of specific plans for the Villages and SUDs. This master response has been developed to address the following, but not limited to, individual comments: R-4, V-2, V-24, V-25, DD-1, DD-3, II-1, WW-1, WW-7, WW-8, WW-9, WW-10, WW-14, WW-15, YY-1, YY-6, YY-7, FFF-1, FFF-2, and HHHH-5.



SOURCE: MHM, 2006; and ESA, 2007

City of Lincoln General Plan Update EIR . 202078

**Figure 2-1**  
City of Lincoln NEV Plan



The Draft 2050 General Plan includes Policy LU-15.1 on page 4-33 that states “The City shall require the completion and approval of a specific plan and associated General Plan Amendment prior to development of land within an area designated as a Village.” Following this policy statement, descriptions of the “Criteria of a Specific Plan” and “Specific Plan Content” are provided to clarify the proposed land use framework anticipated for future development.

The Draft 2050 General Plan provides a discussion of “Special Use Districts” (SUD) in Section 4.5 beginning on page 4-42. Policy LU-16.1 states that “The City shall require the completion and approval of a specific plan to guide future development within the designated SUD.”

The City’s General Plan is intended to consist of a policy document and a land use/circulation diagram that conceptually identifies the location and type of land uses as well as conceptual street alignments for the entire City.

The Draft 2050 General Plan's projected residential dwelling units are intended to represent a potential estimated range of units that could occur for each type of dwelling unit proposed under the Draft Land Use and Circulation Diagram. The Draft 2050 General Plan policies anticipate that more precise determinations of land use and acreage will occur through development of the required Specific Plans for each of the Villages and SUDs. Because any Specific Plan must be consistent with the General Plan, the approved Specific Plans will cause the General Plan's adopted land uses to be amended.

Specific Plans for the Villages and SUDs will consider opportunities and constraints such as floodplains, wetlands, vernal pools, heritage trees, sensitive habitats, buffers, conservation easements, topography, etc. These plans will identify the specific location and type of land uses, detailed alignments for streets and the necessary infrastructure, as well as the financial funding for these improvements. The environmental impacts of each specific plan will be analyzed pursuant to CEQA, and there will be public hearings before the Planning Commission and City Council to consider the merits of each specific plan. As a result, each Specific Plan’s land use acreages and/or residential dwelling units may change through the entitlement and environmental process.

## **Master Response #8: Comments Specific to Regional Growth Projections**

Several Commenters state that the Draft EIR does not provide sufficient background information on how the regional population growth projections were developed for the City’s Draft General Plan. This master response has been developed to address the following, but not limited to, individual comments: V-2, V-5, V-17, JJJ-8, and DDD-12.

The Sacramento Valley has an estimated existing population of 1.8 million persons and is projected to grow by 1.7 million persons and experience an increase in new jobs of 1.1 million over the next 50 years by SACOG. These projections were developed by the Center for the Continuing Study of the California Economy on behalf of SACOG as part of its Blueprint Transportation and Land Use Study. SACOG is responsible for distributing funds for future roadways and air quality improvements within a six county region (which includes Placer County and the City of Lincoln). SACOG recently studied the necessary roadway improvements required

to accommodate this population growth by 2050 and found that there were not sufficient Federal, state and local funds to provide all the necessary future roadways for the projected growth. Therefore, SACOG prepared an additional study with a focus on altering the pattern of land use development to reduce the need for vehicle trips and to make better use of transportation funding for existing and possible future roadways. This study is commonly known as the “Blueprint Plan.” Part of this analysis was to understand not only potential levels of growth but also how it would likely be distributed throughout the six county region. This required the study to develop projections of growth for each of the counties and cities within the region, including Placer County. The SACOG study predicted that Placer County would capture some 25% of the new job growth, approximately 269,000 jobs by 2050 and add a population of approximately 592,000 residents during this timeframe. To house this population growth, SACOG estimated that Placer County and its cities would need to accommodate approximately 158,000 new dwelling units over the 50-year period.

The Blueprint Plan developed state-of-the-art modeling tools to estimate a variety of potential impacts (including transportation, air quality, and economic) associated with these land use patterns and to identify alternatives to these land use patterns. The Blueprint Plan provides the region’s 25 local jurisdictions (cities and counties) information upon which to base local land use planning decisions. With the study’s modeling tools, local jurisdictions will be able to determine how their land use choices might affect the regional transportation system that serves their citizens. Generally, the Blueprint Plan concluded that the best way to accommodate future population increases would be through a variety of “smart growth” principles including increased use of infill development and development with higher densities.

The Draft 2050 General Plan was developed in consideration of the general principles, land use concepts and “smart growth” principles of the SACOG Blueprint Plan. SACOG’s “Draft Preferred Blueprint Scenario” provided an estimate of the City’s existing housing and projections for new housing growth of 48,900 dwelling units through 2050, as shown in Table 2-1 below. As a participant in the Blueprint effort, the City, through its General Plan has planned to accommodate its share of the region’s projected growth. While the City’s build-out levels do not accommodate as much of the development as SACOG projected, this level was determined to be a reasonable share of the region’s growth, which allowed the City to achieve its objectives of economic development and a fiscally sustainable community.

**TABLE 2-1  
SACOG’S DRAFT PREFERRED BLUEPRINT SCENARIO FOR THE CITY OF LINCOLN**

<b>Residential Type</b>	<b>Percent of Existing</b>	<b>New Housing Growth through 2050</b>
Rural Residential	6%	0%
Large Lot Single-Family	80%	40%
Small Lot Single-Family	0%	29%
Attached Products	14%	31%
Total Dwelling Units		48, 900

As a comparison, the total number of new residential units developed for the Draft 2050 General Plan is projected at approximately 34,100 total new residential units. Of this total, new residential units by City residential land use categories as projected in the Draft 2050 General Plan are comprised of the following:

- 441 Rural Residential units at 0.5 dus/ac,
- 2,348 Country Estates units at 2 dus/ac,
- 13,800 Low Density Residential units at 4.5 dus/ac,
- 9,400 Medium Density Residential units at 8 dus/ac, and
- 8,100 High Density Residential units at 16 dus/ac.

Using residential densities developed for the City’s Draft 2050 General Plan, a comparison of proposed or projected residential type or density by percentages from SACOG “Draft Preferred Blueprint Scenario” for the City to the City’s Draft 2050 General Plan is presented in Table 2-2.

**TABLE 2-2  
COMPARISON OF RESIDENTIAL GOALS USING LINCOLN’S DENSITIES**

Residential Land Uses	SACOG Goals	Lincoln Goals
Rural Residential	0%	8%(a)
Low Density Residential	40%	40%
Medium Density Residential	29%	28%
High Density Residential	31%	24%
Total Dwelling Units	48,900	34,100

Footnote (a): Rural Residential is the only permitted land use in Lincoln Regional Airport overflight zone.

## **Master Response #9: Comments Specific to the Water Supply Analysis for the Proposed Project**

Several Commenters provide comments regarding the water supply and state that the Draft EIR does not provide sufficient background information on future water supply for the City’s Draft General Plan. This master response has been developed to address the following, but not limited to, individual comments: G-8, M-1, P-13, and P-14.

This master response further explains the water supply analysis contained in the Draft EIR and Background Report. The information provided in this master response is entirely consistent with the information contained in the Draft EIR; it is designed solely to provide further explanation and clarification of the water supply analysis in the Draft EIR. Notably, this master response does not constitute either “new information” or “substantial changes” to the project or the

circumstances under which the project is being undertaken, and, thus, does not trigger further recirculation under Public Resources Code section 21166.

After the release of the Draft EIR, on February 1, 2007, the California Supreme Court issued its decision in *Vineyard Area Citizens For Responsible Growth v. City of Rancho Cordova* (42 Cal.4th 412). The decision enunciates four overarching principles with regard to the manner in which cities and counties should prepare water supply analyses when preparing EIRs for large land use plans pursuant to CEQA. These principles are as follows:

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

This master response is provided, in part, because of the Supreme Court’s decision and the City of Lincoln’s desire to ensure full compliance with the Court’s ruling and to supplement its previous analysis. This supplement was prepared in order to describe how the Final EIR complies with the Court’s ruling and to update the current status of securing interim and permanent water supply, as necessary and appropriate.

This response discusses: (1) historical demand and existing City of Lincoln water supply conditions; (2) various aspects of the City’s water supplies including certainty and reliability of deliveries from PCWA and NID, (3) potential impacts of increased groundwater pumping by the City within the Sphere of Influence area, and (4) the City’s water management strategies during normal, single-dry and multiple-dry years. These elements are discussed in the Draft EIR; however, this information more fully describes how the City reached its conclusions.

### ***Historical Demand and Existing Conditions***

As described on page 6-2 of the Draft EIR, Lincoln meets its water needs through a treated water agreement with the Placer County Water Agency (PCWA) and a temporary raw water sales agreement between the City, PCWA, and the Nevada Irrigation District (NID), and with

groundwater and reclaimed water. NID is responsible for providing raw water to PCWA for wholesale treated water delivery to the NID service area within the existing City limits.

In 2006, PCWA sold approximately 10,600 acre-feet of treated water to the City. Total PCWA treated water delivery to Lincoln in 2005 was 7,602 acre-feet; of this, approximately 1,109 acre-feet was within the NID service area. Total PCWA treated water delivery to Lincoln in 2006 was 8,780 acre-feet; of this, approximately 1,402 acre-feet was within the NID service area.

Currently, NID water is delivered through PCWA facilities because NID does not have infrastructure in place to deliver treated water to its service area within Lincoln. NID currently delivers raw water directly within the City's Sphere of Influence. As the City limits expand, new customers are automatically within PCWA's Zone 1 service area. NID has entered into a temporary water sales agreement with PCWA to provide raw water to PCWA for treatment and delivery of surface water to the City and its Sphere of Influence until NID has the means available to serve the City's needs within NID's service area boundary.

The following discusses the existing potable and non-potable water demand in the City of Lincoln and its Sphere of Influence.

#### **Historical Potable Water Demand**

In 2006, the total potable water demand for the City was approximately 9,428 acre-feet, with 8,780 acre-feet of treated surface water from PCWA, and 648 acre-feet supplied from City wells. The ratio of surface water and ground water of the annual totals are 93% and 7% respectfully.

The 2006 maximum day demand was 16.6 million gallons, based on about 15.2 million gallons from PCWA and 1.4 million gallons from City wells. The City's current (2006) contract limit with PCWA for maximum day (24-hours) delivery is 15,510,778 gallons per day.

#### **Peaking Factors**

Potable water use within the City of Lincoln varies according to seasonal weather changes. The highest potable water demands usually occur between May and October when a lack of precipitation and higher temperatures lead to higher urban water uses involving landscaping and irrigation. Based on records from 2001 to 2006, peak demands usually occur in July and August. Minimum demand usually occurs in February.

The maximum day demands from 2001-2006 are shown in Table 6-2 of the General Plan Background Report.

#### ***City of Lincoln Water Supply Portfolio***

As explained on pages 6-2 to 6-3 of the Draft EIR and 6-4 to 6-8 of the General Plan Background Report, the City of Lincoln has the benefit of a diversified portfolio of water supply resources, but primarily relies upon surface water supplies provided by PCWA and NID. The City also relies upon groundwater sources to meet backup, emergency, and peak demands to facilitate the management of available surface water supplies. Moving forward with the land uses planned in the Draft 2050 General Plan, the City also is building facilities, creating ordinances, and

otherwise facilitating the use of recycled water from the City's recently completed Wastewater Treatment and Reclamation Facility (WWTRF).

Pages 6-4 to 6-5 of the Draft EIR explain how Lincoln plans to meet projected water demands under the Proposed Project from a combination of water deliveries (including those under existing contracts with PCWA and NID) from five sources.

These sources represent the proposed permanent or buildout water supply. The City believes that there is a reasonable certainty that the 53,000 AFA long-term or buildout water supply (including potable, treated surface water, potable groundwater, non-potable raw water and non-potable reclaimed water) from these sources will become available to serve the Draft 2050 General Plan area. A discussion regarding the certainty and reliability of each of these water supplies follows.

### **Contract with the Placer County Water Agency**

#### PCWA Surface Water Supplies

PCWA has several sources of surface water supply entitlements available for use in western Placer County. These sources are described as follows:

- ***PCWA Yuba/Bear River Supply (also referred to as PG&E Supply).*** PCWA's primary source of supply for Zone 1 has been a surface water supply contract with PG&E for 100,400 AFA of Yuba/Bear River water that is delivered through PG&E's Drum Spaulding hydrogeneration system. PCWA's contract with PG&E ends in 2013, but PCWA has begun negotiations with PG&E about renewing this contract; and PCWA expects to conclude a new water supply contract with PG&E well before the expiration of the existing contract in 2013.

Historically, this source of water has a high reliability during normal, single-dry, and multiple dry years. For instance, between 1987 and 1992, the state experienced a five year drought, during which many areas in the state had reduced water supplies. PCWA had a full Yuba/Bear River supply each year of the drought. Records indicate that 1977 is the only year in which PCWA had to impose drought restrictions on its customers due to reduced PG&E supply. PCWA's 2005 *Urban Water Management Plan* contains a water shortage contingency analysis that includes a five-stage rationing plan that would be invoked during a declared water shortage.

There are no infrastructure limitations to the delivery of 100% of PCWA's surface water supply entitlements under its PG&E (100,400 AFA) contract.

- ***PCWA Middle Fork Project/American River Supply.*** PCWA augments its Bear/Yuba River surface water supply for consumptive use through its Middle Fork Project water rights to American River water and through a contract with the United States Bureau of Reclamation for a maximum of 120,000 acre-feet of Central Valley Project's American River water.

The Middle Fork Project reservoirs' storage capacity is 340,000 acre-feet. A Water Rights Permit from the California State Water Resources Control Board allows the PCWA to divert up to 120,000 AFA for consumptive use. The permit provides that this water supply may be diverted

from the American River at either Auburn or Folsom Reservoir. PCWA has performed extensive modeling of the Middle Fork Project system to determine its reliability during drought events using California's hydrologic record, which dates back to 1921. Based on that analysis, PCWA concluded that the Middle Fork Project can provide 120,000 AFA, even in dry years as severe as the 1976-1977 hydrologic event (PCWA 2005 UWMP, p. 4-3.).

PCWA is planning and developing several major water system improvements to carry American River water supplies to water users throughout western Placer County. These projects include:

- American River Pump Station: The United States Bureau of Reclamation is constructing a \$72 million project, which is slated to be complete in 2008. The American River Pump Station will supply up to 35,500 AFA to Placer County via the existing three mile-long Auburn Tunnel. If the 35,000 AFA Central Valley Project (CVP) water entitlement that is currently proposed to be taken from the Sacramento River (not to be confused with the existing 35,500 AFA entitlement to divert Middle Fork Project water at Auburn) is shifted to the American River Pump Station, an enlargement of the pump station facility would be required, so that the total amount to be diverted for PCWA's purposes would be 70,500 AFA.
- Auburn Tunnel Pump Station: The \$44 million Auburn Tunnel Pump Station is currently under construction at PCWA's Ophir Road site. The station will pump water to the surface of the 200-foot-deep Auburn Tunnel that runs beneath the site. The project will also pump water to the Foothill WTP and into the Dutch Ravine Canal system, which runs to the Lincoln and Rocklin areas. The pumps will also supply the new water treatment plant in Ophir.
- Ophir Water Treatment Plant and Conveyance Pipelines: PCWA has indicated that the long-term water supply from the American River Pump Station source at Auburn would require constructing 16.8 miles of new 60-inch and 6.3 miles of new 48-inch treated water pipeline connecting to PCWA's existing water distribution system. PCWA is currently in the design phase of the proposed state-of-the art Ophir Water Treatment Plant project located adjacent to the American River Pump Station. The Ophir Water Treatment Plant would supply a portion of the already approved 35,500 AFA for diversion at the American River Pump Station. Initially, the facility would provide 30 million gallons of water a day. The plant could be expanded to handle as much as 120 million gallons of water daily. The plant's design is about 95 percent complete, and a Final Environmental Impact Report has been certified for the project. The next phase is acquisition of various required environmental permits. Growth and land use policies in Placer County will determine expansion of the plant. Groundbreaking is scheduled for 2009, and the plant is scheduled for operation in 2011.
- Foothill Raw Water Pipeline: A 39-45-inch-diameter pipeline is proposed to run three miles from the Ophir Road site to the Foothill water treatment plant. This will serve as a backup water supply to the Foothill water treatment plant. It also includes a connection to the Dutch Ravine Canal system and a new 18-inch treated water line to provide for local service and to connect to the existing 1-million-gallon Newcastle storage tank.
- Central Valley Project Supply: PCWA has a contract with the United States Bureau of Reclamation (Reclamation) for a maximum of 117,000 AFA of CVP water to be available on a build-up schedule, which began with 15,000 acre-feet in 1992, building to the maximum of 117,000 acre-feet in 2007. Prior to delivering more than 35,000 AFA, however, Reclamation and PCWA must meet to determine to what extent, if any,

Reclamation is obligated to deliver more than 35,000 AFA to PCWA in the absence of Auburn Dam. PCWA is authorized through its contract with Reclamation to take 35,000 AFA of CVP contract water at Folsom Reservoir or other places that are agreed to by the affected parties. PCWA is currently pursuing this 35,000 AFA diversion at the Sacramento River in accordance with the Water Forum Agreement. An EIR/EIS is currently in process for the Sacramento River water diversion project, and an initial alternatives analysis has been completed (Sacramento River Water Reliability Study Initial Alternatives Report). The Draft EIR/EIS is projected for public release some time in summer/fall of 2008. PCWA does not plan to use any of the 35,000 AFA Reclamation contract entitlement prior to putting to use the full 120,000 acre-feet available to it annually from the American River pursuant to its water right permits. PCWA's CVP contract was amended in 2002 to provide for only 35,000 acre-feet of CVP water with an option to increase the contract if the Auburn Dam is built.

- Potential Sacramento River Supply: A long-term cooperative project between PCWA and the cities of Sacramento and Roseville is currently undergoing environmental review. The project proposes to divert 35,000 acre-feet of water from the Sacramento River to help accommodate the water needs of growth in western Placer County over the next 30 years. This project includes a river diversion and water treatment plant north of the Sacramento Airport. PCWA would be provided with 65 million gallons of treated water per day through a 13 mile-long, 72-inch-diameter pipeline. PCWA is in the process of trying to meet mitigation requirements for the indirect impacts associated with the project. The project is estimated to cost \$442 million and is charged for completion in 2016 (*Placer Vineyards Specific Plan Second Partially Recirculated Revised Draft EIR (2007)*).

At build-out, expected to occur prior to 2050, the City anticipates relying upon 34,000 acre-feet per year of water from PCWA as part of its water supply portfolio necessary to meet its municipal and industrial demands. Although the City's contract with PCWA does not guarantee that this amount will be available, PCWA's August 2006 *Integrated Water Resources Plan (IWRP)* projects that it will supply the City with 38,055 acre-feet of treated water per year at build-out of the City's general plan area<sup>1</sup>. Based on PCWA's representation of what will be available to the City at build-out and PCWA's water rights and contract entitlements, it is reasonably certain that 34,000 acre-feet per year in normal water years will be available from PCWA to meet water demands at build-out of the Draft 2050 General Plan. An important aspect of the City's projected build-out water supply from PCWA is that it does not rely upon the development by PCWA of additional water supply sources. Rather, as indicated in the PCWA IWRP, existing PCWA water rights and contracts will be sufficient to provide the City with anticipated water supplies. Further evidence supporting the availability of 34,000 acre-feet per year is contained in PCWA's comment letter to the Draft EIR, which states, "The water supply section of the [Draft EIR] closely reflects the Placer County Water Agency's Integrated Water Supply Plan for providing the City of Lincoln a treated water supply." Also, please refer to the response prepared to Comment M-1.

### PCWA Infrastructure

---

<sup>1</sup> The 38,055 acre-feet value in PCWA's document includes 3,300 acre-feet provided through PCWA from NID water supplies that are used to serve a portion of the City's existing customers within the NID service area.

The City is located in the PCWA Zone 1 service area. Other PCWA Zone 1 customers include Rocklin, Loomis, Penryn, Newcastle, Ophir, Auburn, and portions of Granite Bay. PCWA's water supply sources for Zone 1 are comprised of water purchased from PG&E's hydrogeneration facilities along the Yuba and Bear Rivers, Middle Fork Project water from the American River, and Central Valley Project. The City has a renewable contract with PCWA for wholesale treated water deliveries. PCWA's 2005 Urban Water Management Plan demonstrates that PCWA has identified adequate supplies for Zone 1.

The City's contract with PCWA does not specify the maximum amount of water that PCWA is obligated to deliver to the City in future years. Instead, the contract states that the water supply will be annually supplemented based on the number of equivalent development units paid for by the City. As of March 20, 2007, the City had a maximum annual water delivery from PCWA of 16,624,952 gallons per day (approximately 18,600 acre-feet per year). The City's water supply contract with PCWA expires on December 31, 2012, but provides that the City is "entitled to renewals for successive periods not to exceed twenty years at a time."

PCWA can deliver wholesale treated surface water to the City from the Foothill and Sunset water treatment plants, which are located in the southern part of Zone 1 and serve Lincoln, Penryn, Loomis, Rocklin, and a portion of Granite Bay. The Foothill and Sunset water treatment plants treat surface water from the Wise, South, and Caperton Canals. The maximum daily capacity of the Foothill plant is 55 million gallons per day. The Sunset plant's capacity is 8 million gallons per day, and it is typically only operated during the peak summer months and during outages in the PG&E supply to the Foothill water treatment plant.

From the Foothill water treatment plant, the treated water travels through a network of large diameter pipelines (24 through 42-inches in diameter). Treated water from the Sunset water treatment plant travels less than a mile via a 30-inch pipeline. This treated water from both sources is conveyed to two points-of-delivery (two PCWA metering stations) adjacent to the City's 5 million gallon concrete storage tank at Conspiracy Point. Conspiracy Point is located at the southeast corner of the Twelve Bridges development, near the easterly edge of the City Limits. The City's contract limit for PCWA treated surface water supplies in 2006 for maximum daily deliveries was approximately 17.3 mgd, or about 12,000 gallons per minute. For 2006, PCWA annual sales to Lincoln were approximately 8,800 acre-feet.

As discussed above, PCWA recently approved the construction of a new 30 million gallon per day water treatment plant, called the Ophir Water Treatment Plant, along Ophir Road near Newcastle (formerly Foothill II Water Treatment Plant). This new Ophir water treatment plant along with a new pipeline conveyance system would provide additional treated water supplies to the City. As analyzed in the Foothill II Water Treatment Plant and Pipeline EIR, construction of the project includes construction of a new treated water delivery pipeline (ranging from 42 to 60 inches) that will connect the new Ophir WTP to the City's proposed City Pond 10 mg storage tank at its City Pond site (identified as the Lincoln Storage Tank Farm in the Draft EIR) and the Sunset 10 mg water storage tanks. Development of the entire pipeline will be completed over two separate phases with each phase implemented, as required, to meet future planned water demand needs. Each of these phases is described below.

Phase I of the treated water conveyance facility will consist of a 4.7 mile transmission pipeline segment that will tie into the existing cross-basin water transmission system near the intersection of Taylor and Rock Springs Road in Penryn. The alignment will begin at the WTP and follow Ophir Road west for approximately 1.25 miles. The alignment then proceeds west along Taylor Road and through a developed industrial area until it reaches a crossing with the Union Pacific Railroad. The proposed pipeline will be tunneled under this crossing and then turn south towards Taylor Road. The final segment of the alignment follows along Taylor Road (predominately within paved sections of the roadway) until it reaches the existing cross-basin water transmission system. A pressure reducing station will be located at a location to be determined along the alignment (currently anticipated for a location along the alignment between Callison and Rock Springs Roads). The pipeline will range from 42 to 60 inches in diameter.

As part of the Phase I segment, a 12-inch pipeline is also proposed. This pipeline alignment would connect to an existing 12-inch waterline near the Interstate 80 park-and-ride lot and continue southwest to the existing Newcastle system in Taylor Road paralleling the larger 42 to 60-inch pipeline.

Phase II of the treatment water conveyance facility will consist of an 8.5 mile transmission pipeline segment that will begin at the intersection of Taylor and Callison Roads. Connecting with the Phase I pipeline segment, the alignment will travel west to Sierra College Boulevard. The pipeline alignment will then continue southwest to a new pressure reducing and City of Lincoln point-of-delivery (metering station) that will be constructed near the connection to a new PCWA 30-inch pipeline connecting the proposed City Pond and the Sunset 10 mg water storage tanks. A treated water high service pump station will be needed at the WTP to deliver water along this portion of the alignment. Similar to Phase I, this segment of the water conveyance facility will range from 42 to 60 inches in diameter. (Foothill II Water Treatment Plant and Pipeline Draft EIR (2005).)

### Reliability

The City's water supply contract with PCWA provides that water deliveries in dry water years may be reduced but does not specify how any shortages are allocated to the City or other wholesale or retail customers of PCWA. PCWA's most recent water supply planning documents are the 2005 *Urban Water Management Plan* (2005 PCWA UWMP) and the August 2006 *Integrated Water Resources Plan* (IWRP). Pages 4-8 to 4-9 of the 2005 PCWA UWMP analyze PCWA's 2030 surface water supply reliability for Zone 1 customers, including the City of Lincoln. Specifically, the PCWA UWMP provides that the City could potentially experience the following reductions in its PCWA surface water supply:

- Up to a 15 percent reduction in deliveries of water from PCWA to its wholesale customers in a single dry water year in 2030 (Table 4-8, PCWA UWMP)
- Up to 5 percent reduction in each year of a multiple dry-year.

Reductions in dry-year water supplies result from potential curtailments in deliveries of PCWA's surface water supplies. In a worst-case single-dry year, PCWA projects that it will be able to divert all of its 120,000 acre-feet per year Middle Fork Project supply (see Table 2-3 below), 75

percent of its CVP supply (26,250 acre-feet per year according to the U.S. Bureau of Reclamation's Municipal and Industrial (M&I) Shortage Policy of 25 percent reductions to urban contractors) and 50 percent of its PG&E supply (50,000 acre-feet per year). During multiple dry water years, PCWA projects that it will be able to divert all of its 120,000 acre-feet per year Middle Fork Project supply, 75 percent of its CVP supply (26,250 acre-feet per year) and 75 percent of its PG&E supply (75,300 acre-feet per year). Projected PCWA water supplies presented in the PCWA UWMP are shown in Table 2-3 below.

**TABLE 2-3  
PROJECTED PCWA WATER SUPPLIES**

PCWA Supply	Normal Year (acre-feet/year)	Multiple Dry Years (acre-feet/year)	Single Dry Year (acre-feet/year)
<b>Middle Fork Project</b>	120,000	120,000	120,000
<b>CVP</b>	35,000	26,250	26,250
<b>PG&amp;E</b>	100,400	75,300	50,000
<b>Total</b>	255,400	221,550	196,250

Potential reductions in PCWA's CVP supply as projected in the 2005 PCWA UWMP and PCWA IWRP do not consider operation of the planned Sacramento River Diversion currently being assessed. The Sacramento River diversion project would not provide an additional source of water nor insulate PCWA from potential reductions of up to 25 percent resulting from the U.S. Bureau of Reclamation's M&I Shortage Policy. However, it would allow PCWA to divert its CVP supply from the Sacramento River during periods that are critical to the American River habitat, thus adding to the reliability of PCWA's water supply portfolio.

#### **Contract with Nevada Irrigation District**

NID supplies irrigation, wholesale, and retail water to Nevada County and Placer County customers. Agricultural water use accounts for nearly 90 percent of the total demand on NID water supply. The remaining 12-13% of water supplied by the District is primarily delivered to single-family residential accounts. NID's service area covers Nevada County and a portion of Placer County. NID's mountain watersheds cover 70,000 acres and include the upper portions of the Middle Yuba River above Milton Diversion, Canyon Creek above Bowman Reservoir, and Deer Creek.

In anticipation of the proposed Draft 2050 General Plan update, the City negotiated a supply of treated surface water to be provided by NID. In October 2004, NID entered into a temporary water sales agreement to provide raw water to PCWA for treatment and delivery of surface water to the NID service area within the City of Lincoln until NID has other means available to serve Lincoln's treated needs within NID's service area boundary.

The City is currently negotiating with NID for a Water Facilities/Planning Phase agreement to establish a conceptual framework for the design and construction of a new \$235 million water treatment facility. The preferred site for the new plant is near NID's Valley View site located northeast of the City, as identified in the *Lincoln Area Water Treatment Plant Planning and Site*

*Study* (2005). The proposed treatment facility would allow NID to serve Lincoln customers directly rather than wheeling raw water to PCWA for treatment and delivery.

In addition to receiving a treated water supply, as discussed in the preceding paragraphs, Lincoln has historically received raw or non-potable surface water from NID for use by a few private customers. The private use of the raw water includes irrigation of landscape and golf course improvements, as well as maintaining delineated wetland areas within the developments. In addition, NID's Hemphill Canal on the easterly edge of the City limits and the Auburn Ravine provide raw water for uses within the City. NID currently has private contracts to deliver about 1,540 AFA within the City.

### NID Surface Water Supplies

NID's surface supplies consist of watershed runoff, carryover storage in surface reservoirs, recycled water, and contract purchases. The District's *2005 Urban Water Management Plan* concludes that the District will not experience supply deficiencies during single and multiple dry years throughout the 2006-2030 planning period. NID water supply sources are described as follows:

- ***Watershed Runoff.*** This supply consists of runoff from the Middle Yuba River above Milton Diversion, Canyon Creek above Bowman Reservoir, Texas Creek, Fall Creek, and Deer Creek. The amount of runoff and the manner in which it may be used depends upon the amount of water contained in the snow pack and the rate at which the snow pack melts. The system of storage reservoirs and conduits used to transport water to NID's service area boundary is referred to as the Upper Division. Maximum capacity of conduits in the Upper Division limits the amount of runoff for consumptive purposes. The 76-year average AFA of watershed runoff supply is 228,700 AFA.
- ***Carryover Storage.*** Carryover storage is the amount of water left in reservoirs at the end of a normal irrigation system. NID has ten primary storage reservoirs totaling a maximum of 280,390 acre-feet. The 37-year average of NID's carryover storage supply is 118,200 acre-feet. The only years that carryover storage fell below the 37-year average level in the past 37 years were 1992, 1994, and 2002.
- ***Recycled Water.*** NID's recycled water supply consists of effluent from municipal wastewater treatment plants that is captured and mixed with surface waters. At present, this occurs below the Grass Valley, Nevada City, Auburn, and Placer County at Joeger Road treatment plants. With the exception of the small town of Smartville, this raw water supply is not used as raw water supply for NID's treated water supply.
- In 2000, NID received 3,200 AFA of recycled water. The quantity of recycled water available is estimated to increase as NID's service area is developed. NID's *2005 Urban Water Management Plan* estimates that recycled water will supply 4,000 AFA by the year 2030.
- ***Contract Purchases.*** NID has a contract with PG&E for a maximum of 59,361 acre-feet during years of at least normal precipitation. This maximum amount is reduced to 23,581 acre-feet in dry years. In 1995, NID purchased only 7,356 AFA of surface water under the PG&E contract and only 8,936 AFA in the year 2000. NID's *2005 Urban Water Management Plan* estimates purchasing 8,000 AFA a year up through the year 2030.

The contract expires in 2013, and a renegotiated contract could affect NID's overall water supply. According to NID's 2005 *Urban Water Management Plan*, NID does not foresee any major changes over present operations once negotiations have concluded.

### Certainty

On February 4, 2004, the City and NID entered into a Memorandum of Understanding (MOU) to assess the feasibility of providing the City with a treated water supply. Among the numerous efforts undertaken pursuant to the MOU was completion of the *Lincoln Area Water Treatment Plant Planning and Site Study* (WTP Study) in August 2005. As described in the WTP Study, the treatment plant would be capable of meeting projected annual water demand of 17,500 acre-feet per year. Of this amount, approximately 70 percent would be allocated to the City, which is estimated to be approximately 12,000 acre-feet per year.

On July 4, 2007, the City and NID established a conceptual framework for the development of a treated water facility including a Framework for Collaboration. The City and NID contemplate moving forward under the following four definitive agreements:

- Agreement on the respective service areas of NID and Lincoln;
- Agreement regarding the planning required to install the water treatment plant and associated facilities, including environmental evaluation;
- Agreement on terms and conditions of treated water service to be provided, at wholesale, by NID to Lincoln; and
- Agreement on the financing and construction of said Project.

Similar to the City's water supply from PCWA, water supplies from NID would come from existing NID water rights and entitlements and do not require that additional water supply sources be developed by NID. Therefore, the City believes with reasonable certainty that its NID water supplies are likely to serve the Proposed Project.

### Reliability

Although the Framework for Collaboration between the City and NID provides that any curtailments in water deliveries from NID would be shared equally between the City and NID's own domestic water customers using the same water source, NID's 2005 Urban Water Management Plan (2005 NID UWMP) projects that no reductions are likely during dry periods. The 2005 NID UWMP includes the 12,000 acre-feet per year that the City is relying upon from NID to meet its water demands at build-out. Of its total annual supply of 358,900 acre-feet projected at 2030, NID projects that it will have all of its available supply during multiple dry water years and 269,025 acre-feet per year available during a single dry water year.

Despite potential decreases in supply, NID projects that its water demands will be 215,700 acre-feet per year in 2030. This is over 50,000 acre-feet per year less than projected water supplies during a single dry water year, allowing NID to meet all projected demands during dry periods well into the future.

### ***Potential Impacts of Groundwater Pumping within City's Sphere of Influence***

The Draft EIR discusses the Project's potential impacts of groundwater pumping on pages 6-9 to 6-10. The Lincoln Sphere of Influence (SOI) is located in the eastern central part of the Sacramento Valley Groundwater Basin, within the North American Subbasin. Placer County's underlying groundwater basin generally contains high quality water. Preliminary findings of PCWA's ongoing groundwater study show the maximum average annual yield within the Placer County portion of the groundwater basin is approximately 95,000 AFA. Groundwater use in western Placer County is mostly limited to agricultural uses, though the City of Lincoln supplements its surface water with groundwater when necessary during peak demand or emergency supply periods.

Existing information indicates that there are significant groundwater resources underlying the Lincoln SOI, especially in the western part of the area. According to Lincoln's 2005 Urban Water Management Plan, a conservative estimate of the Lincoln SOI's groundwater supply is 47,250 acre-feet of recoverable water in place. An average yearly total recharge to the Lincoln SOI area is thought to be approximately 17,153 AFA, of which 11,664 AFA occurs as deep percolation and 3,697 AFA as inflows from streams or canals.

The City currently pumps groundwater to meet emergency, dry, and peak water demands for the City. The combined pumping capacity of these wells is about 8 million gallons per day. In 2006, groundwater production provided about 17% of the annual demand, or approximately 1,603 acre-feet.

In 2003, the City completed and adopted a Groundwater Management Plan (GMP) that provides a framework to effectively manage and protect this vital groundwater resource. The City has established a goal in the GMP of meeting no more than 10% of the estimated annual demand of 2050 General Plan build-out from groundwater. Meeting this goal is dependent on a multitude of factors, including, but not limited to, seasonal climatic conditions, wholesale water supply availability from PCWA and NID, peak seasonal demands, increased usage of recycled water supplies, and through providing above-ground maximum day storage.

In 2006, a Memorandum of Understanding was signed by Lincoln, PCWA, and the City of Roseville to proceed with the West Placer County Groundwater Management Plan (WPCGMP) effort. The Basin Management Objectives are listed below:

- Management of the groundwater basin shall not have a significant adverse effect on groundwater quality;
- Manage groundwater elevations to ensure an adequate groundwater supply for backup, emergency, and peak demands without adversely impacting adjacent areas;
- Participate in State and Federal land surface subsidence monitoring programs;
- Protect against adverse impacts to surface water flows in creeks and rivers due to groundwater pumping; and
- Ensure groundwater recharge projects comply with State and federal regulations and protect beneficial uses of groundwater.

In 2007, the City, working with PCWA and others, began developing the WPCGMP. The City of Lincoln adopted the WPCGMP on November 27, 2007. This effort builds upon and expands the

geographic coverage of the City's own GMP. As documented in both the City's GMP and the WPCGMP, the groundwater conditions underlying the City and the SOI indicate currently and historically stable groundwater elevations and reliable water quality.

The City is planning to install additional wells within the Lincoln Sphere of Influence to be able to, when necessary in back-up and emergency situations, meet 75% of the average day demand at buildout (approximately 34 mgd) with groundwater. The City is conducting ongoing groundwater investigations to help determine optimal well spacing and pumping schedules.

The City will continue its field and theoretical analyses over the next few years, developing a Lincoln area groundwater model and quantifying recharge and recoverable groundwater volumes. The City is currently in discussions with the Regional Water Authority, PCWA, the County of Placer and the City of Roseville regarding the sharing of groundwater data in the Western Placer County area, and developing a mutually beneficial Integrated Water Resources Management Program. The Integrated Water Resources Management Plan will address anticipated water use policies and goals regarding surface water, groundwater, and reclaimed water in western Placer County.

The following findings with regard to the use of groundwater can be concluded from PCWA's *Integrated Water Resources Plan* (2006):

- The historic average annual rate of groundwater use within the Placer County portion of the North American River Groundwater Basin is approximately 95,000.
- According to semi-annual well data collected by the State Department of Water Resources since the 1940s, the subsurface groundwater level in western Placer County in the area west of Roseville has been relatively stable since the early 1980s following decades of steady decline.
- Based upon this information, PCWA believes that the current groundwater use and natural recharge rate are in balance and that current average annual groundwater pumping rates within the basin can be sustained indefinitely without a further decline in the subsurface groundwater level. Therefore, the average annual rate of groundwater use of 95,000 is considered the "safe yield."
- Therefore, as urban development replaces historic groundwater irrigated agriculture, there is an opportunity to develop groundwater for use in meeting urban domestic and irrigation demands without adversely affecting groundwater levels or long-term groundwater reliability.

The City of Lincoln's surface water supplies, particularly PCWA's 35,000 AFA CVP contract entitlement and its Yuba/Bear River 100,400 AFA contract with PG&E, will be subject to shortages in future dry years. To make up for such dry year shortfalls and for backup in the event of emergency or planned outages, the City of Lincoln will supplement its surface water supply with groundwater to serve the 2050 General Plan area. In order to ensure there is no adverse long-term impact of such dry year groundwater use, there must be groundwater banking in normal and wet years to offset the planned dry year use. That banking can most efficiently occur

through “in-lieu recharge,” which is the reduction of historic groundwater use in normal and wet years, allowing the natural recharge flow to accumulate in the aquifer. Based on the conclusions of PCWA’s *Integrated Water Resources Plan* (2006) and the City’s implementation of groundwater banking in normal and wet years, the City’s groundwater use will not, in any event, exceed the “safe yield” of the groundwater basin.

### Certainty

As the City grows, additional municipal wells are anticipated to be placed within the SOI west of the City. Currently, much of this area is in irrigated agriculture, which uses a varying amount of surface water and groundwater to meet crop water demands. As the agricultural uses in this area are replaced with urban land uses, the historic use of groundwater for agricultural irrigation will decline. However, with the placement of new City wells to manage for emergency, dry, and peak water needs, groundwater use will continue.

To understand whether future groundwater within the areas of the SOI are similar to historic and existing uses of groundwater for irrigated agriculture, and therefore reasonably certain to exist, a groundwater analysis was completed and is described below.

### Groundwater Analysis

Primary data sources and assumptions used in the analysis include:

1. Data:

- a. Existing and anticipated future crop acreage data for the lands within the SOI but outside the existing City boundaries - ECORP Consulting
- b. Evapotranspiration rates, crop coefficient values and precipitation – California Irrigation Management Information System (CIMIS) for Station #131 (Fair Oaks)
- c. Irrigation methods and associated irrigation efficiencies – Technical Memo: On-Farm Irrigation Systems Management (June 1994) prepared in support of the Bureau of Reclamation, Mid-Pacific Region’s Central Valley Project Improvement Act Programmatic EIS

2. Assumptions:

- a. Groundwater is used to regionally supplement PCWA raw water supplies:
  - i. early in the growing season for some PCWA contractors
  - ii. directly to irrigate crops with no surface water supplies

- iii. to supplement shortages in PCWA raw water based on a frequency of shortfalls once every 6 to 10 years (equivalent to a 10 to 15 percent occurrence of shortfalls in surface water supplies over multiple years).
- b. Groundwater use for early irrigation and for lands with no surface water is assumed to represent 10 percent of the total estimate of applied water.
- c. Based on PCWA's Integrated Water Resources Plan, shortages to users in Zone 5 are estimated to be 15 percent.
- d. The long-term annual average of this shortage condition is represented by assuming an additional two percent of the applied water is met with groundwater every year (e.g., nine of ten years has 100 percent surface supply and one year has only 85 percent).
- e. Combined, groundwater is assumed to meet 12 percent of the annual applied water demand for the crops within the SOI under both existing and future conditions.

Table 2-4 indicates the estimated applied water use under the existing crop acreage and crop mix, as well as that expected after build-out according to the Draft 2050 General Plan.

**TABLE 2-4  
CURRENT WATER USE FOR AGRICULTURAL LANDS IN  
THE CITY OF LINCOLN SPHERE OF INFLUENCE**

Crop	Irrigated Acres in SOI		Applied Water per acre (feet)	Total Applied Water	
	Existing	Future		Existing	Future
<b>Alfalfa</b>	220	129	4.7	1,034	605
<b>Orchards</b>	100	95	4.4	441	418
<b>Pasture</b>	901	193	4.8	4,325	927
<b>Rice</b>	3,168	515	5.7	18,060	2,933
<b>Row Crops</b>	2,116	689	4.6	9,735	3,169
<b>TOTAL</b>	<b>6,506</b>	<b>1,620</b>		<b>33,595</b>	<b>8,052</b>

Using the assumption that 12 percent of the total applied water values is met with groundwater, it is estimated that current use of groundwater within the SOI represents approximately 4,000 acre-feet annually. Under future conditions, groundwater use for irrigated crops is estimated to be 1,000 acre-feet. This represents a reduction of about 3,000 acre-feet from current conditions as a result of irrigated lands taken out of production for new land uses proposed in the General Plan Update.

The increment of groundwater demand necessary to meet the expanded water demand under the 2050 General Plan Update is therefore 2,900 acre-feet per year (5,300 acre-feet minus 2,400 acre-feet). Comparing this to the estimated decrease in use of groundwater for irrigated agriculture indicates a nearly equal offset. Thus, the incremental increase in use of groundwater as part of the City's water supply portfolio represents a use of groundwater equivalent to current conditions. As documented in the WPCGMP and the City's GMP, the groundwater elevations underlying the City and the SOI have remained stable at current conditions. It is safe to conclude, therefore, that the

increment of groundwater use for the City's planned growth would also still maintain current stable conditions. Continued monitoring and management of the groundwater as indicated in both the WPCGMP and the City's GMP will help maintain this condition over time while still providing a reliable increment of groundwater for the City's emergency, dry and peak water demand needs.

### Reliability

The City intends to limit groundwater use during normal years to 10 percent of the overall demand, which is about 5,300 acre-feet. However, to offset shortages in surface water supplies during single and multiple dry years, the City would increase groundwater pumping up to 9,400 acre-feet and 7,800 acre-feet per year, respectively.

Similar to the assumptions presented above regarding the frequency of shortfalls, increased groundwater pumping is expected to only occur every 6 to 10 years. Using this frequency, the long-term average groundwater use would be approximately 11 percent of the annual demand, or about 5,700 to 5,900 acre-feet annually.

### **Recycled Water**

Lincoln recently completed a new Wastewater Treatment and Reclamation Facility (WWTRF) for the purpose of treating wastewater generated within the City. The WWTRF is capable of producing recycled water that meets DHS requirements in Title 22 for unrestricted reuse. Recycled water from the WWTRF is currently utilized for agricultural purposes at four sites with a net area of 382 acres. These are as follows:

1. 122 acres near the City airport
2. 38 acres at the WWTP site
3. 105 acres at Antonio Mountain Ranch, south of the WWTRF
4. 117 acres at the Warm Springs site, west of the WWTRF

Recycled water uses are currently restricted by State regulations; the future City uses of its reclaimed water are expected to be redefined by pending federal and State actions.

The anticipated recycled water uses within the City will account for as much as 1,700 AF/year of the anticipated build-out water demand. Uses for recycled water include irrigation of park, school, and median landscapes (including along the proposed Highway 65 Bypass right of way) and industrial cooling and process water for a few of the City's primary industries.

### ***Water Supply Management during Normal, Dry and Multi-Dry Water Years***

#### **Normal Water Years**

The City projects that build-out water demand will be 53,000 acre-feet per year<sup>2</sup>. To meet this demand in normal water years, the City's water supply portfolio relies upon 34,000 acre-feet per

---

<sup>2</sup> This value is presented in Table 5 of Appendix F to the Draft EIR as the water demand to use for the projected population and land-uses proposed in the General Plan Update.

year of treated water from PCWA, 12,000 acre-feet per year of treated water from NID, 5,300 acre-feet per year of groundwater, and 1,700 acre-feet per year of recycled water (see Table 2-5).

**TABLE 2-5  
CITY OF LINCOLN NORMAL YEAR WATER SUPPLIES AT BUILD-OUT**

Supply	Quantity (acre-feet per year)
PCWA	34,000
NID	12,000
Groundwater	5,300
Recycled Water	1,700
<b>TOTAL</b>	<b>53,000</b>

### Single-Dry and Multiple-Dry Water Years

Water demands are planned to be met with a combination of water deliveries from PCWA and NID, pumping from the City's groundwater wells, and recycled water. As a result of potential reductions in the City's PCWA supply of up to 15 percent during a single-dry year and up to five percent in each year of multiple-dry years, the City is planning to increase groundwater pumping to be able to meet water demands without the need to implement demand reduction measures as shown in Table 2-6 below.<sup>3</sup> No reductions in supply from NID during dry years are projected. Use of recycled water is planned to be constant regardless of hydrologic year type.

**TABLE 2-6  
CITY OF LINCOLN WATER SUPPLY**

Supply	Normal Water Year (acre-feet/year)	Single Dry Water Year (acre-feet/year)	Multiple Dry Water Years (acre-feet/year)			
			1	2	3	4
PCWA	34,000	28,900	32,300	32,300	32,300	32,300
NID	12,000	12,000	10,200	10,200	10,200	10,200
Groundwater	5,300	10,400	8,800	8,800	8,800	8,800
Recycled Water	1,700	1,700	1,700	1,700	1,700	1,700
<b>TOTAL</b>	<b>53,000</b>	<b>53,000</b>	<b>53,000</b>	<b>53,000</b>	<b>53,000</b>	<b>53,000</b>

<sup>3</sup> Implementation of temporary demand reduction measures during a dry period would reduce the reliance on increased groundwater use. However, ignoring this benefit allows this analysis to understand the reliability of identified water supply sources under more conservative conditions.

## Individual Responses

### Public Agencies – Federal, State and Local

#### **Letter A. US Fish and Wildlife Service and California Department of Fish and Game**

**Response to Comment A-1:** Commenter provides background information regarding the natural setting and biological resources found within the Planning Area. This comment does not require a response.

**Response to Comment A-2:** Commenter requests revisions to General Plan Policy LU-1.4, which include defining “significant watercourses” and developing criteria to evaluate the effectiveness of buffers between development projects and natural resources. Policy LU-1.4 states, “The City shall require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands.” Defining the term "significant watercourse" and developing evaluation criteria would be, at this point, premature. Concerning the definition of "significant watercourse," this term will change in meaning as ongoing environmental and regulatory efforts provide additional scientific data regarding local and regional habitat conditions. The Draft 2050 General Plan is a broad policy document. The City will, on a case-by-case basis, evaluate a variety of natural resources (including the significance of each watercourse) through its current planning and environmental review process, which implements existing scientific information and appropriate evaluation techniques in cooperation with applicable regulatory agencies to determine the significance of specific watercourses and other natural habitats found in the Planning Area.

Commenter also states that Policy LU-1.4 (as currently proposed) does not require buffers adjacent to other types of natural resources. The following policies, proposed as part of the Draft 2050 General Plan, address buffers between development projects and natural resources and provide for natural resource protection:

- **Policy LU-1.4 Buffer.** The City shall require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands. *[New Policy]*
- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use Element Policy 4.29]*
- **Policy LU-12.4 Creek Natural Edges.** Where feasible, the City should preserve the existing natural edges along the City’s creek system and wetland areas and restore impacted creeks by planting natural vegetation. *[New Policy]*
- **Policy LU-12.8 Site Planning.** The City shall encourage site planning that incorporates creek and wetland edges into the overall development. *[New Policy]*

- **Policy OSC-1.1 Protect Natural Resources.** The City shall strive to protect natural resource areas, fish and wildlife habitat areas, scenic areas, open space areas and parks from encroachment or destruction by incompatible development. *[Modified Existing Policy 1, Open Space, Conservation and Recreation Element]*
- **Policy OSC-1.3 Creation of Buffers.** In new development areas, the City shall encourage the use of open space or recreational buffers between incompatible land uses. *[New Policy]*
- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*

Identification of additional, specific, and quantified criteria for evaluating the effectiveness of buffers, as suggested by this comment is considered unnecessary at this point. This type of language goes beyond the intent of a typical general plan policy, which is to provide guidance for development within a particular jurisdiction and not to provide project-specific mitigation measures that would be developed and monitored to address the individual impacts of a particular project.

Because the use of specific buffers (i.e., type, length, width, etc.) will be highly contingent on a number of site specific factors (including project type, land uses, topographic conditions, etc.), general plan policies have been developed to provide flexibility on the types of buffers that may be used in order to address the range of circumstances where buffers may be appropriate to address open space or biological resource impacts. As development is proposed for future Village or SUD areas, more detailed specific plans and subsequent project-level environmental documentation will be prepared to address localized impacts to biological resources (including the use and type of open space buffer). Please refer to Master Responses #2 and #7.

**Response to Comment A-3:** Commenter suggests that the City develop an additional land use policy that specifically addresses the preservation of natural habitat features. An additional land use policy is not necessary because existing policies address the preservation of natural habitat features. Please see Response to Comment A-2 and Master Response #2.

Commenter also recommends that all existing conserved land within the project area be extracted from the General Plan boundaries to assure clarity. Changing the General Plan boundary to exclude existing conservation lands will not improve or clarify the open space policies of the General Plan; nor would it change the fact that parcels currently under conservation easements will continue to remain as open space and protected by an easement. The retention of existing conserved land within the Planning Area is consistent with current City practices and will continue to occur throughout the Draft 2050 General Plan timeframe. By continuing to include these areas within the proposed General Plan boundaries and implementing the land use and conservation policies included in the Draft 2050 General Plan, the City has the ability to influence the creation of continuous areas of open space or preservation areas around existing conservation lands. The General Plan boundary will not be modified to exclude existing conservation lands.

Commenter also requests that the General Plan clarify whether existing conserved lands count towards the 40% open space requirement for each Village. As proposed under the Draft 2050 General Plan, existing conserved open space will count toward the 40% open space requirement for each Village due to its classification as an open space use. Please see page 4-41 of the Draft Goals and Policies Report for additional information on how open space uses within proposed Villages are defined.

**Response to Comment A-4:** Commenter recommends that the General Plan incorporate specific policies that will ensure that Open Space policies effectively conserve natural resources. The City reviewed its Draft Goals and Policies Report specific to the conservation of open space resources and considers the proposed policies adequate to address this issue. Therefore, no additional policies or revisions to existing policies have been made specific to this request. The Draft 2050 General Plan (as proposed) includes several policies that will effectively address a variety of environmental resources, with several of these policies (including but not limited to) identified below from the Land Use and Open Space/Conservation Elements:

- **Policy LU-1.4 Buffer.** The City shall require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands. *[New Policy]*
- **Policy LU-1.11 Natural Resource Conservation.** To promote a high quality of life within the community, the City will in conjunction with related policies in other general plan elements, promote the retention of natural open space areas, greenbelts, and the provision of adequate parks as part of approving new land use designs. *[New Policy]*
- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing, and berming. *[Revised Land Use Element Policy 4.29]*
- **Policy OSC-1.1 Protect Natural Resources.** The City shall strive to protect natural resource areas, fish and wildlife habitat areas, scenic areas, open space areas, and parks from encroachment or destruction by incompatible development. *[Modified Existing Policy 1, Open Space, Conservation and Recreation Element]*
- **Policy OSC-5.1 Protect Significant Vegetation.** The City shall support the preservation of heritage oaks and threatened or endangered vegetative habitat from destruction. *[Modified Existing Policy 5, Open Space, Conservation and Recreation Element]*
- **Policy OSC-5.2 Management of Wetlands.** The City shall support the management of wetland and riparian plant communities for passive recreation, groundwater recharge, and wildlife habitats. Such communities shall be restored or expanded, where possible and as appropriate. *[New Policy]*

Additionally, additional project-level analysis will occur for future projects, which would identify specific impacts to a variety of open space resources and provide additional preservation opportunities for these areas that would be affected based on project specific information. Where impacts are identified, associated mitigation for these impacts will be developed subject to State and Federal regulations. Please refer to Master Response #2 for further discussion of the requirements of a program EIR.

**Response to Comment A-5:** Commenter states that General Plan goals (including Goal OSC-1 and OSC-5) regarding protection and preservation of biological resources conflict with projected growth and proposed growth patterns and, thus, are unachievable. Goals OSC-1 and OSC-5 are broad statements that are intended to lay the foundation for a specific set of policy statements that will guide a specific course of action for decision-makers to use in achieving a desired goal.

Additionally, Commenter states that the General Plan does not contain any goals or policies considering federally or state listed or sensitive species or winter migrant waterfowl or migrant raptors. The City, regardless of any specific policy, is required to comply with all federal and state laws concerning endangered species and understands its requirements. To reinforce this commitment and understanding of federal and state law, the City is also proposing the following additional policy that was developed during preparation of the Draft EIR:

- **Policy OSC-5.12 Appropriate Mitigation Measures.** The City shall consider using appropriate mitigation measures for future projects (i.e., specific plans or individual projects) based on mitigation standards or protocols adopted by the applicable statute or agency (e.g., USFWS, CDFG, etc.) with jurisdiction over any affected sensitive habitats or special status species. *[New Policy – Draft EIR Analysis]*

Further, specific policies from the Draft 2050 General Plan will protect natural resources and include the following:

- **Policy OSC-1.1 Protect Natural Resources.** The City shall strive to protect natural resource areas, fish and wildlife habitat areas, scenic areas, open space areas and parks from encroachment or destruction by incompatible development. *[Modified Existing Policy 1, Open Space, Conservation and Recreation Element]*
- **Policy OSC-1.2 Coordinate with Placer County for Open Space Preservation.** The City shall coordinate with Placer County and their Placer Legacy program to ensure City issues are incorporated into future plans. *[New Policy]*
- **Policy OSC-1.3 Creation of Buffers.** In new development areas, the City shall encourage the use of open space or recreational buffers between incompatible land uses. *[New Policy]*
- **Policy OSC-5.1 Protect Significant Vegetation.** The City shall support the preservation of heritage oaks and threatened or endangered vegetative habitat from destruction. *[Modified Existing Policy 5, Open Space, Conservation and Recreation Element]*

- **Policy OSC-5.2 Management of Wetlands.** The City shall support the management of wetland and riparian plant communities for passive recreation, groundwater recharge, and wildlife habitats. Such communities shall be restored or expanded, where possible and as appropriate. *[New Policy]*
- **Policy OSC-5.3 Placer Legacy Open Space and Conservation Program.** The City will continue to coordinate with Placer County and the Placer Legacy Open Space and Conservation Program to protect habitat areas that support endangered species and other special-status species. *[New Policy]*
- **Policy OSC-5.5 New Development in Sensitive Areas.** The City shall require that new development in areas that are known to have particular value for biological resources be carefully planned and where possible avoided so that the value of existing sensitive vegetation and wildlife habitat can be maintained. *[New Policy]*
- **Policy OSC-5.6 No Net Loss of Wetlands.** The City will maintain a policy of no net loss of wetlands on a project-by project basis, which may include an entire specific plan area. For the purpose of identifying such wetlands, the City will accept a map delineating wetlands which has been accepted by the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act of 1972. The term “no net loss” may include mitigation implemented through participation in an off-site mitigation bank or similar mitigation mechanism acceptable to the City and permitting agencies. *[Modified Existing Policy, Public Facilities Element]*

In response to Commenter’s opinion regarding a potential conflict between the City’s goals addressing habitat preservation efforts and projected population growth, regardless of how one characterizes previous growth patterns/trends, one of the primary guiding principles (see pages 1-6 and 1-7 of Chapter 1 of this Final EIR) of the City’s Draft 2050 General Plan is to implement a variety of smart growth principles to help guide future growth in the Planning Area. These smart growth principles include the organization of future growth into Villages (see Section 4.4 “Villages” of the Draft Goals and Policies Report) that will be developed through the adoption of specific plans. These specific plans will be used to organize future growth in a manner that addresses the preservation of natural resources (including 100 year floodplains, dedicated conservation areas, etc.) and the various species associated with the habitats that comprise these resource areas. Further, past growth patterns are not necessarily a predictor of future growth. Also, please refer to Master Response #2.

**Response to Comment A-6:** Commenter suggests that Policy OSC-1.1 be revised to develop quantifiable or measurable means of achieving natural resource conservation. Policy OSC-1.1, “Protect Natural Resources,” is intended to lay the foundation for subsequent project-specific activities that would be developed for the protection of a variety of land uses, including those that remain as open space, which includes fish and wildlife habitat, natural resource areas, scenic areas, and parks. Quantifying means of achieving natural resource conservation would, at this stage, be premature. Proposed Draft 2050 General Plan policies contained in the Open Space and Conservation Element identify specific resources that should be preserved and protected. These

policies include OSC-5.1 “Protect Significant Vegetation,” OSC-5.2 “Management of Wetlands,” and OSC-5.6 “No Net Loss of Wetlands,” which read as follows:

- **Policy OSC-5.1 Protect Significant Vegetation.** The City shall support the preservation of heritage oaks and threatened or endangered vegetative habitat from destruction. *[Modified Existing Policy 5, Open Space, Conservation and Recreation Element]*
- **Policy OSC-5.2 Management of Wetlands.** The City shall support the management of wetland and riparian plan communities for passive recreation, groundwater recharge, and wildlife habitats. Such communities shall be restored or expanded, where possible and as appropriate. *[New Policy]*
- **Policy OSC-5.6 No Net Loss of Wetlands.** The City will maintain a policy of no net loss of wetlands on a project-by-project basis, which may include an entire specific plan area. For the purpose of identifying such wetlands, the City will accept a map delineating wetlands which has been accepted by the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act of 1972. The term "no net loss" may include mitigation implemented through participation in an off-site mitigation bank or similar mitigation mechanism acceptable to the City and permitting agencies. *[Modified Existing Policy, Public Facilities Element]*

These policies in conjunction with existing or modified policies from other elements of the General Plan (see General Plan Policies LU-1.4, LU-1.14, and LU-15.13), provide guidance for the future protection of natural resources to the extent feasible and read as follows:

- **Policy LU-1.4 Buffer.** The City shall require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands. *[New Policy]*
- **Policy LU-1.14 Land Use Conflicts.** The City shall continue to apply the regulations and procedures of the City's Zoning Ordinance and shall use the environmental process to prevent or mitigate land use conflicts. *[New Policy – Draft EIR Analysis]*
- **Policy LU-15.13 Village Land Use Mixes.** The City shall ensure that each village area maintains a mix of residential types and densities, and that the residential mix will provide appropriate transitional features that integrate the villages with the surrounding area. The distribution of residential designations within each village shall fall within the ranges specified in Table 4-5. Table 4-5 shows targeted land use percentages. The specific plans will define the exact land uses based on site-specific information (e.g., topography, wetlands, and floodplains). *[New Policy]*.

Additionally, the environmental impacts of future projects will be analyzed during the development and approval process for the specific plans. That process will identify project-specific impacts to a variety of open space resources and provide additional preservation opportunities for areas. Where impacts are identified, associated mitigation for these impacts will be developed pursuant to State and Federal regulations. Please refer to Master Response #2 for further discussion of the requirements of a Program EIR.

**Response to Comment A-7:** Commenter suggests that the Draft 2050 General Plan incorporate policies that will ensure that future development avoid important natural resources. Lands within the proposed General Plan boundaries primarily located beyond the edges of the existing urbanized areas of the City are considered to be comprised of land with a higher probability of important natural resources, such as listed species or sensitive habitats. However, these Villages and Special Use Districts will be subject to project-specific environmental review that will require each project to identify and mitigate any impacts to biological resources. Development in the Villages and Special Use Districts will also be required to submit a Specific Plan laying out the land uses and location of where development will occur. Additionally, these areas are subject to General Plan Policy LU-15.13, which requires that 40 percent of the gross area be designated for open space. Development within these areas is further limited by the locations of existing conserved lands and State and federal requirements for mitigating or avoiding impacts to listed species and sensitive habitats, such as vernal pools.

Furthermore, the Draft 2050 General Plan contains a number of policies that outline methods and guidance for the creation and maintenance of open space areas that will protect and preserve listed species and sensitive habitats. These policies include the following:

- **Policy LU-1.4 Buffer.** The City shall require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands. *[New Policy]*
- **LU-15.13 Interconnected / Usable Open Space.** Within each village or specific plan area, a minimum of 40 percent of the gross area will be reserved for open space. This open space will be identified in the required specific plan and secured from future development in a form acceptable to the City. *[New Policy]*
- **Policy OSC-1.1 Protect Natural Resources.** The City shall strive to protect natural resource areas, fish and wildlife habitat areas, scenic areas, open space areas and parks from encroachment or destruction by incompatible development. *[Modified Existing Policy 1, Open Space, Conservation and Recreation Element]*
- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*
- **Policy OSC-5.1 Protect Significant Vegetation.** The City shall support the preservation of heritage oaks and threatened or endangered vegetative habitat from destruction. *[Modified Existing Policy 5, Open Space, Conservation and Recreation Element]*
- **Policy OSC-5.3 Placer Legacy Open Space and Conservation Program.** The City will continue to coordinate with Placer County and the Placer Legacy Open Space and Conservation Program to protect habitat areas that support endangered species and other special-status species. *[NewPolicy]*

- **Policy OSC-5.5 New Development in Sensitive Areas.** The City shall require that new development in areas that are known to have particular value for biological resources be carefully planned and where possible avoided so that the value of existing sensitive vegetation and wildlife habitat can be maintained. *[New Policy]*
- **Policy OSC-5.6 No Net Loss of Wetlands.** The City will maintain a policy of no net loss of wetlands on a project-by project basis, which may include an entire specific plan area. For the purpose of identifying such wetlands, the City will accept a map delineating wetlands which has been accepted by the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act of 1972. The term “no net loss” may include mitigation implemented through participation in an off-site mitigation bank or similar mitigation mechanism acceptable to the City and permitting agencies. *[Modified Existing Policy, Public Facilities Element]*

**Response to Comment A-8:** Commenter states that Policy OSC-1.3 will not ensure that adequate buffers will be employed to ensure resource conservation. As more fully described in the response prepared to Comment A-2, the determination of an adequate buffer area will be determined on a case-by-case basis. Please refer to the response prepared for Comment A-2 and Master Responses #2 and #7.

**Response to Comment A-9:** Commenter suggests that Policy OSC-1.4 be rewritten to provide additional setbacks for local waterways, which will assure protection of natural resources and conserve water quality. Policy OSC-1.4 sets a minimum of 50 feet for the establishment of future buffer areas and, therefore, does not preclude the use of larger sized buffer areas where appropriate. Please refer to Response to Comment A-2.

Commenter also suggests that Auburn Ravine, Coon Creek, and Markham Ravine be protected with 300 foot setbacks. The use of a standard 300 foot setback is considered arbitrary and may not be appropriate for all areas of these waterways. For example, the width of the Auburn Ravine channel varies in width within the Planning Area due to a variety of topographic conditions. Consequently, the appropriate setback around this waterway will be evaluated on a case-by-case basis to ensure protection of water quality and natural resource protection. The Draft 2050 General Plan also includes a number of policies (including policies OSC-4.3, OSC-4.6, and PFS-4.8) that provide guidance on water quality issues and help to complement open space policies designed to establish buffer areas and setbacks around sensitive resources in the Planning Area. Those policies read as follows:

- **Policy OSC-4.3 Protect Surface Water and Groundwater.** The City shall ensure that new development projects do not degrade surface water and groundwater. *[New Policy]*
- **Policy OSC-4.6 Best Management Practices.** The City shall continue to require the use of feasible and practical best management practices (BMPs) to protect surface water and groundwater from the adverse effects of construction activities and urban runoff. Additionally, the City shall require, as part of its Storm Water NPDES Permit and ordinances, to implement the Pollution Prevention Plan (SWPPP) during

construction activities for any improvement projects, new development and redevelopment projects for reducing pollutants to the maximum extent practicable. *[Revised Policy – Draft EIR Analysis]*

- **Policy PFS-4.8 Discharge of Urban Pollutants.** The City shall require appropriate runoff control measures as part of future development proposals to minimize discharge of urban pollutants (such as oil and grease) into area drainages. *[Modified Existing Policy, Public Facilities Element]*

**Response to Comment A-10:** Commenter suggests that BMPs identified in Policy OSC-4.6 be replaced with Low Impact Development Strategies (LIDS). LIDS are an innovative approach to stormwater management that allow for stormwater and environmental controls to be incorporated into the landscape, built environment, and infrastructure so that pollution is controlled at the source in small scale distributed facilities, such as green roofs, rain gardens, or permeable pavers. An advantage of such systems is that pollution is not transported through the infrastructure or drainage system, and facilities can be constructed incrementally. LIDS allow for multiple objectives to be achieved including maintaining water quality programs, reduction of the urban heat island effect, and improvement in the overall aesthetics of a site.

The City's Draft 2050 General Plan includes a number of policies that require the use of a variety of BMPs, which could include the use of LIDs. Additionally, given the City's commitment to this issue, the City is considering adoption of the following implementation measure as part of the Public Facilities and Services Element:

- **Implementation Measure 10.0.** The City shall incorporate low impact development (LID) alternatives for stormwater quality control into development requirements. LID alternatives may include, but are not limited to, the following: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education. *[New Implementation Measure – Final EIR]*

**Response to Comment A-11:** Commenter suggests replacing “threatened or endangered vegetative habitat” in Policy OSC-5.1 with “federally and state threatened and endangered fish, wildlife and plant species”. Policy OSC-5.1 states, "The City shall support the preservation of heritage oaks and threatened or endangered vegetative habitat from destruction." In consideration of this request, the City reviewed its Draft Goals and Policies Report. Policy OSC-5.1 addresses protecting significant vegetation; thus, the City does not believe that changing the policy to include fish and wildlife is appropriate for this policy. Additionally, other policies in the Draft 2050 General Plan protect fish and wildlife, and the City is required to comply with all applicable state and federal laws concerning endangered species. The City considers such other policies adequate to address this issue. Please see the response to Comment A-5 for additional information. Further, by preserving a variety of sensitive habitats, the City is also preserving sensitive plants and wildlife species that are associated with or use these habitats.

**Response to Comment A-12:** Commenter suggests amending Policy OSC-5.2 to include adjacent upland habitats as a necessary component for supporting the management of wetland and riparian plant communities. Policy OSC-5.2 reads as follows:

- **Policy OSC-5.2 Management of Wetlands.** The City shall support the management of wetland and riparian plant communities for passive recreation, groundwater recharge, and wildlife habitats. Such communities shall be restored or expanded, where possible and as appropriate. *[New Policy]*

In consideration of this request, the City reviewed its Draft Goals and Policies Report specific to wetland resources and considers the policy adequate to address this issue. By developing and including Policy OSC-5.2 “Management of Wetlands,” the City does consider the holistic management of wetland areas including those upland areas that contribute to the maintenance of a healthy wetland ecosystem. Therefore, no additional policies or revisions to existing policies have been made specific to this request.

**Response to Comment A-13:** Commenter states that, based on the history of growth patterns, Policy OSC-5.5, as written, will not effectively ensure the maintenance of wildlife habitat. The policy reads as follows:

- **Policy OSC-5.5 New Development in Sensitive Areas.** The City shall require that new development in areas that are known to have particular value for biological resources be carefully planned and where possible avoided so that the value of existing sensitive vegetation and wildlife habitat can be maintained. *[New Policy]*

As previously described above in the response to Comment A-5, the Draft 2050 General Plan includes a number of policies that ensure the City’s commitment to providing the maximum protection for natural resources, such as wildlife habitat, to the extent feasible. These policies provide guidance for avoidance of sensitive habitats and protection and preservation measures for significant fish and wildlife species and sensitive habitats, such as the creation of buffers. Furthermore, past activities are not necessarily indicative of future actions.

**Response to Comment A-14:** Commenter notes that the EIR lacks any discussion of local, regional, and statewide vernal pool habitat. Commenter also suggests that the EIR address how the proposed land uses and habitat mitigation or other compensation measures will contribute to the recovery of the vernal pool fairy shrimp. For a complete response to this comment, please see the information provided in the Recirculated Draft EIR and the responses prepared to comment letters YYY-1b and DDDD-1, DDD-3, and DDD-4 (see Chapter 3, “Response to Comments on the Recirculated Draft EIR”).

**Response to Comment A-15:** Commenter states that the Draft EIR does not identify parcels in the Planning Area under long-term protection for natural resource conservation. Commenter indicates that the Draft EIR does not discuss, identify, or quantify the myriad of parcels within the project area that are currently fully protected for purposes of long term natural resource conservation. The General Plan Background Report and Recirculated Draft EIR, in particular Figures 7.2 and 7.6, identify the parcels under long-term protection.

**Response to Comment A-16:** Commenter states that the existing conditions analysis of the Draft EIR does not analyze project impacts to water-oriented birds of the Pacific Flyway or to winter migrant raptors. Impact OSC-6 on page 7-17 of the Draft EIR addresses interference with the movement of migratory wildlife species or with established migratory wildlife corridors. Background environmental setting information on the Pacific Flyway and the current status of migratory bird species is provided in the General Plan Background Report and on page 2.2-14 of the Recirculated Draft EIR. Impacts to water-oriented birds (along with a variety of other species with potential to occur within the Planning Area) are identified on pages 7-11 to 7-14 of the Draft EIR and on pages 2.2-55 to 2.2-63 of the Recirculated Draft EIR. Impacts to a migratory wildlife species or corridor are identified on pages 7-17 to 7-18 of the Draft EIR and on pages 2.2-67 to 2.2-69 of the Recirculated Draft EIR. As described in both the Draft and Recirculated Draft EIRs, the resultant impacts to biological resources remain significant and unavoidable even after implementation of General Plan Goals and Policies designed to minimize impacts to sensitive habitats and wildlife (see Policies OSC-1.1, OSC-1.3, OSC-5.1, OSC-5.2, OSC-5.3, OSC-5.5, OSC-5.6, OSC-5.9, and OSC-5.10).

**Response to Comment A-17:** Commenter requests that the document be revised to fully disclose existing conditions in order for the project impacts to be properly evaluated and mitigated. The Draft EIR on pages 7-8 through 7-10 summarizes the environmental setting for biological resources, and, as more fully described on page 7-8 of the Draft EIR, the General Plan Background Report provides the complete biological resources regulatory and environmental setting section for the General Plan Planning Area. Additionally, the City recirculated the “Biological Resources” section of the General Plan Background Report as part of the Recirculated Draft EIR (see pages 2.2-3 to 2.2-49) for the Draft 2050 General Plan update. The updated “Biological Resources” section includes current regulatory information specific to local resource conditions and current habitat mapping data provided through the County’s conservation planning efforts.

**Response to Comment A-18:** Commenter states that the EIR either fails to discuss or understates impacts associated with habitat fragmentation as a result of the matrix of urban and native lands that will likely result as a consequence of compliance with the broad General Plan policy requiring the retention of 40% open space within General Plan boundaries. In response to this comment, the Recirculated DEIR studied habitat fragmentation. Commenter made similar comments on the Recirculated DEIR, which are responded to in Response to Comment YYY-2 (see Chapter 3 of this Final EIR).

**Response to Comment A-19:** Commenter states that the Draft EIR does not identify project impacts to existing conserved land. Refer to the response prepared for Comment A-15 and A-17 for a discussion of impacts to existing conserved land.

Commenter also states that the EIR does not recognize impacts of the Proposed Project to habitat fragmentation, wildlife population isolation, and habitat connectivity. Refer to the response prepared for Comment A-18 for a discussion of impacts to habitat fragmentation, wildlife population isolation, and habitat connectivity. The EIR describes impacts to a variety of habitats, which would include parcels with existing conserved lands. Consistent with the objectives of a

program-level EIR, the analysis provided in both the Draft and Recirculated Draft EIRs assume that impacts to specific parcels in the Planning Area will be further identified as part of future project-specific environmental analysis (refer to Master Response #2). For a response specific to habitat fragmentation issues, please refer to Response to Comment YYY-2 (see Chapter 3 of this Final EIR), which is a response to comment received on the Recirculated Draft EIR.

Commenter also states that relationship of existing conserved parcels to the proposed project is relevant to the ability of Placer County to develop a viable conservation plan for the HCP/NCCP. As discussed under Impact OSC-8 on page 7-19 of the DEIR, the Placer County Conservation Plan (PCCP) is in the process of being prepared, and the City is participating in developing the PCCP. The impact discussion also refers to policies of the General Plan, such as Policies OSC-1.2 (coordination with Placer County for open space protection) and -5.3 (coordinate with Placer Legacy Open Space and Conservation Program) that would minimize any conflicts with planning documents of nearby jurisdictions.

**Response to Comment A-20:** Commenter states that the Draft EIR does not adequately address direct or cumulative impacts of the Proposed Project on federally-listed, state-listed, and sensitive species associated with vernal pool habitats. Additionally, Commenter states that the Draft EIR should discuss how the proposed alternative will address the goals outlined for the Western Placer Core Area in the U.S. Fish and Wildlife Service's 2005 Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. Direct impacts to species associated with vernal pool habitats are discussed under Impacts OSC-3, OSC-4, and OSC-5 on pages 7-11 through 7-16 of the Draft EIR. Cumulative impacts to annual grasslands, vernal pools, and other seasonal wetlands are addressed on page 11-8 of the Draft EIR and on pages 2.2-72 through 2.2-73 of the Recirculated Draft EIR. The cumulative impact analysis refers to a range of policies in the General Plan that are designed to minimize, to the extent feasible, impacts to biological resources, including sensitive habitats and special status species. For information specific to the Final Recovery Plan for the Vernal Pool Ecosystems of California and Southern Oregon as it relates to the Planning Area, Commenter is directed to pages 2.2-47 and 2.2-48 of the Draft Recirculated EIR.

Overall, the Draft 2050 General Plan was developed with the intention to balance future growth with the need to designate, protect, and encourage the viability of natural resources and open space areas in the Planning Area (see Open Space Conservation Element Goal OSC-1 on page 7-1 of the Draft Goals and Policies Report). Please see the response prepared for Comment A-5 for additional information related to the various goals and policies (including the new policy OSC-5.12) of the Draft 2050 General Plan that have been developed with the intent to preserve open space areas and insure the City's participation in larger regional conservation efforts. Policy OSC-5.12 provides as follows:

- **Policy OSC-5.12 Appropriate Mitigation Measures.** The City shall consider using appropriate mitigation measures for future projects (i.e., specific plans or individual projects) based on mitigation standards or protocols adopted by the applicable statute or agency (e.g., USFWS, CDFG, etc.) with jurisdiction over any affected sensitive habitats or special status species. *[New Policy – Draft EIR Analysis]*.

Due to the programmatic nature of the Draft EIR, only broad impacts to vernal pool habitats and associated species are discussed. Future projects will undergo additional project-level environmental analysis that will identify potential specific impacts to these resources and where those impacts would occur. Where impacts are identified, associated mitigation for these impacts will be developed subject to State and Federal regulations. Please refer to Master Response #2 for further discussion of the requirements of a program EIR.

**Response to Comment A-21:** Commenter states that the Draft EIR presumes that wildlife habitat values can be maintained by configuring a system of avoidance of sensitive habitat areas within the urban matrix. The purpose of the Draft EIR is to identify the impacts associated with implementation of the Draft 2050 General Plan. Consequently, the Draft EIR does not state that existing wildlife habitat values can be maintained through implementation of the Draft 2050 General Plan; nor is the EIR intended to serve the same goals as those intended for a habitat conservation plan. The purpose of the programmatic EIR prepared for the Draft General Plan is to identify the potential impacts to biological resources resulting from implementation of the Draft General Plan and to identify ways (in this case General Plan policies) to minimize significant effects of the project. The EIR prepared for the Draft General Plan clearly identifies at a programmatic level the implications (number of habitat acres converted) of development resulting from implementation of the Draft General Plan. The EIR also acknowledges that even with the implementation of General Plan policies designed to avoid or minimize impacts to species and habitat, development resulting from implementation of the Draft General Plan would ultimately still result in the overall conversion of existing open space resources to developed uses.

As identified on pages 7-11 through 7-19 of the Draft EIR and pages 2.2-55 through 2.2-72 of the Draft Recirculated EIR, most biological resource impacts are considered significant and unavoidable (even with implementation of mitigation in the form of General Plan policies and implementation measures). As part of the approval process for the Draft General Plan, the City will prepare a statement of overriding considerations to address these significant and unavoidable impacts associated with the General Plan.

Commenter also states that neither the General Plan nor the Draft EIR provide specific standards to assure that the 40% reserved open space requirement will be collected in such a manner to fully function as habitat to support the wildlife in this area. As previously described, the EIR is a Program EIR (please refer to Master Response #2 for additional information). As a Program EIR, this document serves as a first-tier document that assesses and documents the broader environmental impacts of a program with the understanding that a more detailed site-specific environmental review may be required to assess future projects implemented under the program. As individual projects with specific site plans and facilities are planned, the City will evaluate each project to determine the extent to which this EIR covers the impacts of the project (including those to wildlife and habitats) and to what extent additional environmental analysis may be required for each specific future project. If further analysis indicates that sensitive habitats or species would be affected by a specific project, the additional project-specific analysis would quantify these impacts and identify project-specific mitigation that would be developed to reduce the severity (to the extent feasible) of the impact. For all required mitigation, a mitigation monitoring and reporting program (MMRP) would be developed and implemented by the City and the specific project applicant. The

MMRP would identify the specific standards that will be required to ensure the effectiveness of the mitigation measures, which may include establishment of onsite or offsite habitat preservation or open space areas. The development of these site or project specific standards is more appropriate at the individual project or specific plan level of analysis and is not intended to be part of the broader policy framework characteristic of a general plan.

**Response to Comment A-22:** Commenter provides background information regarding the relationship between habitat, given its size and connectivity with other habitat areas, and the health of wildlife populations depending on that habitat area. Commenter states that fragmenting large habitat areas into smaller ones reduces the total number of species that can be supported in an area. The City agrees that the preservation of larger areas is preferred to smaller isolated areas that provide limited habitat values. However, the intent of the Draft 2050 General Plan is to balance new growth with the preservation of existing habitat areas. Please refer to the response prepared for comment A-5 for additional information related to the various goals and policies (including the new policy OSC-5.12, which provides that the City shall consider using appropriate mitigation measures for future projects based on mitigation standards or protocols adopted by applicable statutes or agencies) of the Draft 2050 General Plan that have been developed with the intent to preserve open space areas and ensure the City's participation in larger regional conservation efforts. Additionally, as described in the Draft 2050 General Plan, the City is requiring the preservation of open space (minimum 40 percent) within each future village or specific plan area (see Draft 2050 General Plan Policy LU-15.13, which provides that a minimum of 40 percent of the gross area within each village or specific plan will be reserved for open space). Commenter is referred to response prepared for Comment Letter YYY-2 (see Chapter 3 of this Final EIR) for information specific to habitat fragmentation issues.

Commenter also expresses an opinion that the value of on-site open space for conservation is minimal and that the Draft EIR has erred in its conclusions regarding post project values of on-site land. The Draft EIR does not draw any conclusions about post project values of on-site land.

**Response to Comment A-23:** Commenter states that the Draft EIR does not identify impacts to wildlife and habitat associated with required infrastructure, principally road expansion and new arterials. Commenter is referred to Chapter 2 of the Draft EIR, which provides a detailed description of what constitutes the project being analyzed in the EIR. As described in that chapter, the Proposed Project includes the Draft Land Use and Circulation Diagram. Additionally, infrastructure, such as road expansion and new roads would also be considered as future project-specific development occurs throughout the Planning Area. For additional information specific to the scope and content of a Program EIR, please refer to Master Response #2.

**Response to Comment A-24:** Commenter states that the discussion of the Proposed Project's impacts is understated as a result of failing to specify adequate buffers adjacent to habitat areas. As more fully described in the response prepared to Comment A-2, the determination of an adequate buffer area will be determined on a case-by-case basis. Please refer to the response prepared for Comment A-2 and Master Responses #2 and #7.

**Response to Comment A-25:** Commenter states a general disapproval of mitigation measures provided by the Draft 2050 General Plan and Draft EIR and notes previous requests for project-level measures. This document is a Program EIR, which is provided for under CEQA Guideline section 15168(a). This document is a first tier analysis that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site-specific environmental review may be required to assess future projects, which may also require more specific mitigation measures to address identified impacts. Additionally, please refer to Master Response #2.

**Response to Comment A-26:** Commenter states that the mitigation measure modifying Policy OSC-5.11 is required information under CEQA and not an appropriate mitigation measure. Policy OSC-5.11 states, "The City shall require a biological study to be prepared by a qualified biologist for proposed development within areas that contain a moderate to high potential for sensitive habitat." Policy OSC-5.11 provides the means for the City to determine the basis or environmental setting when it looks at biological impact assessment and potential mitigation requirements. For example, as more fully described above under Master Response #7, the preparation of specific plans for the Villages and SUDs will consider opportunities and constraints such as floodplains, wetlands, vernal pools, heritage trees, sensitive habitats, buffers, conservation easements, topography, etc. when preparing the detailed land use plan. In addition, to reinforce the City's commitment to mitigating impacts to biological resources, the City is also proposing the following additional policy that was developed during preparation of the Draft EIR:

- **Policy OSC-5.12 Appropriate Mitigation Measures.** The City shall consider using appropriate mitigation measures for future projects (i.e., specific plans or individual projects) based on mitigation standards or protocols adopted by the applicable statute or agency (e.g., USFWS, CDFG, etc.) with jurisdiction over any affected sensitive habitats or special status species. *[New Policy – Draft EIR Analysis]*

**Response to Comment A-27:** Commenter states that the mitigation measure adding Policy OSC-5.12 only defers conservation of habitat to subsequent actions and unknown mitigation measures. As explained in Master Response #2, this EIR is a Program EIR, which identifies the broad implications of the land use diagram. It is not meant to defer analysis or mitigate future project-specific impacts associated with individual developments. Project-specific impact assessment and mitigation measures will be analyzed as specific plans are developed for the Villages and Special Use Districts.

**Response to Comment A-28:** Commenter suggests that Section 6.4, "Stormwater Drainage," incorporate a discussion of LIDS to reduce project impacts to storm water drainage and water quality. Please see the response for Comment A-10.

**Response to Comment A-29:** Commenter states that the DEIR does not identify feasible and reasonable mitigation measures relating to vernal pools, grassland resources, winter migrant waterfowl, winter migrant raptors, and federally and state listed and sensitive species. Impacts to general biological resources are addressed in Impacts OSC-3, OSC-5, and OSC-6 on pages 7-11 through 7-18 of the Draft EIR. Consistent with a program-level EIR, the Draft EIR impact

analysis identifies policies of the General Plan that are intended to mitigate biological resource impacts. The City is committed to addressing impacts to biological resources. Please see the response prepared for Comment A-26.

**Response to Comment A-30:** Commenter suggests that the Draft EIR analyze the availability of existing vernal pool grasslands in western Placer County. On page 7-2, the Draft EIR addresses impacts to a variety of habitats, including annual grasslands and wetlands. As previously described above under the response to Comment A-21, the specific mitigation requirements for individual projects (including the identification of both on-site and off-site compensation areas) will be identified for all future project-specific environmental compliance activities. The Recirculated Draft EIR provides additional information specific to the location of preservation areas. Please refer to the response prepared for Comment A-15.

**Response to Comment A-31:** Commenter suggests that the Draft EIR develop specific mitigation measures that consider buffers, minimum retained size of native habitats, the spatial relationship to existing resources, values for connectivity, adjacent land uses, buffers on urban land, and new roads. As previously described, additional project-specific environmental compliance activities, including mitigation measures, may be required in the future as specific plans are prepared for the Villages and Special Use Districts. Please refer to the response prepared for Comment A-2.

**Response to Comment A-32:** Commenter concludes that the benefits of the mitigation measures identified in the Draft 2050 General Plan and Draft EIR are vastly overstated. This general comment has been addressed as part of the responses to Comments A-1 through A-31 included above. No further response is necessary.

**Response to Comment A-33:** Commenter provides a summary of previous statements, suggestions, and requests related to the City of Lincoln's Draft 2050 General Plan Update EIR, which have been addressed in the previous responses prepared for Comments A-1 through A-31.

### ***Letter B. Department of Conservation***

**Response to Comment B-1:** Commenter provides background information regarding the Department's responsibilities and jurisdiction. This information is noted, and no specific response is required.

Commenter also provides a summary of project impacts and the mitigation measures proposed to address the conversion of agricultural land. The Draft EIR at page 4-25 and the Recirculated EIR at page 2.1-2 address the conversion of agricultural land within the project area. The Recirculated EIR corrects an error in Table 4-21, which incorrectly lists 710 acres of Important Farmlands as being converted. The correct number of 7,110 acres is shown in the revised Table 4-21 of the Recirculated EIR. Both documents reach the same conclusion, which is that policies and implementation measures included as part of the Proposed Project would minimize this impact (See Policies LU-5.4, LU-9.6 and OSC-2.1 and Open Space and Conservation Implementation Measure #7), they would not prevent the overall net loss of Important Farmlands within the project boundaries. Those policies and implementation measure read as follows:

- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use Element Policy 4.29]*
- **Policy LU-9.6 Maintain Urban Edge.** The City shall maintain a distinct urban edge, while creating a gradual transition between urban uses and open space. *[New Policy]*
- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*
- **Open Space and Conservation Implementation Measure #7.** The City shall adopt a right-to-farm ordinance to protect agricultural operations immediately adjacent to the City from complaints from new urban development.

Consequently, the impact was determined to remain significant and unavoidable.

**Response to Comment B-2:** Commenter recommends that additional information be provided on the objectives identified by other cities and Placer County to address agricultural land conversion. Commenter does not name any specific cities. A review of the General Plan of surrounding cities in Placer County found that the cities do not have specific policies or objectives regarding agricultural land conversion. Placer County, in its General Plan, adopted many policies designed to support and maintain agricultural operations within its jurisdiction. The City identified just one policy specific to the issue of agricultural land conversions, Policy 1.H.4, which states that the County shall allow the conversion of existing agricultural land to urban uses only within community plan areas and within city spheres of influence where designated for urban development by the General Plan Land Use Diagram. It is, thus, unknown what specific information Commenter requested be included.

**Response to Comment B-3:** Commenter recommends that the City consider the purchase of agricultural conservation easements to mitigate impacts to agricultural land or the provision of fees to a local, regional or statewide organization or agency whose purpose includes the purchase and maintenance of agricultural conservation easements. The Draft 2050 General Plan does provide for Goals and Policies to preserve agricultural lands, (See Goal OSC-2, Policies OSC-2.1 and OSC-2.2, Policies LU-5.3, -5.4 and -5.5, and Open Space and Conservation Implementation Measure #7) and avoid land use conflicts with those agricultural areas that are not within the planning boundaries of the City. The goals and policies read as follows:

- **Goal OSC-2.** To cooperate with Placer County in preserving agricultural operations which area located outside the city's planning boundaries. *[New Goal]*
- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*

- **Policy OSC-2.2 Agricultural Disclosures.** The City will require that developers of residential projects, which are within general proximity of agricultural operations in the county, provide notification to new homeowners within their deeds, of the County's right to farm ordinance. *[New Policy]*
- **Policy LU-5.3 Protect Agriculture.** The City shall ensure that agricultural land uses are not prematurely terminated by protecting the continued operation of agricultural land uses. *[Revised Land use Element Policy 4.28]*
- **Policy LU-5.4 Agricultural Buffers.** The city shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use Element Policy 4.29]*
- **Policy LU-5.5 Agricultural Disclosure.** Residential development locating next to active agricultural areas will have a notice included in the deed notifying buyers of the agricultural use. *[New Policy]*
- **Open Space and Conservation Implementation Measure #7:** The City shall adopt a right-to-farm ordinance to protect agricultural operations immediately adjacent to the City from complaints from new urban development.

Additionally, the City is considering the following policy:

- **Policy OSC-2.3 Coordinate with Neighboring City/County Agricultural Objectives.** The City shall support policies adopted by neighboring cities and Placer County to promote the viability of agriculture in the county. *[New Policy – Draft EIR]*

These policies are designed to provide adequate buffers and land use designs necessary to avoid incompatible land uses that might impact those areas in the unincorporated portions of the County planned for ongoing agricultural activities. With these policies, the City considers the proposed policies adequate to address the protection of agricultural resources. Although development anticipated under the Draft 2050 General Plan would result in the conversion of some existing agricultural lands to a developed use, the City is committed to balancing the impacts of future planned growth with existing agricultural resource areas and activities. The adoption of a measure to purchase agricultural conservation easements would not alter the findings of the EIR analysis that the conversion of agricultural land is a significant and unavoidable impact.

**Response to Comment B-4:** Commenter notes the various sections of the California Government Code and California Code of Regulations that address land under a Williamson Act contract that are proposed for cancellation. There are no proposed cancellations of Williamson Act contracts as part of the update of the General Plan. The City will follow the proper procedures contained within the Williamson Act contract. The Draft 2050 General Plan provides policies that encourage orderly development and strive to avoid the premature conversion of agricultural lands; please refer to Policy LU-5.3, entitled "Protect Agriculture," which provides,

"The City shall ensure that agricultural land uses are not prematurely terminated by protecting the continued operation of agricultural land uses."

***Letter C. California Governor's Office of Planning and Research***

**Response to Comment C-1:** Commenter states that the City of Lincoln has complied with the State Clearinghouse review requirements pursuant to the requirements of CEQA. This comment does not require a specific response.

***Letter D. California Department of Transportation, District 3***

**Response to Comment D-1:** Commenter provides a general summary regarding the project description of the Draft EIR. No specific response is required.

**Response to Comment D-2:** Caltrans commends the City of Lincoln for identifying impacts to the State Highway System. This comment does not require a specific response.

**Response to Comment D-3:** Commenter states that the existing plus project analysis estimates an additional approximate 300,000 trips on the State Highway System. It appears that Commenter estimates an increase of 300,000 "trips" on the State Highway System by summing the average daily traffic (ADT) volumes for all highway segments in Table 5-26 (of the Draft EIR) for "Existing Plus Project" and then subtracting the sum of ADT for "Existing Conditions." While this comparison provides a general indication of how the Draft 2050 General Plan would impact the State Highway System, it double-counts trips that impact multiple highway segments.

Mitigation Measures involving improvements to the State Highway System include the following:

- Existing Plus Project Conditions: Measures TC-7a and TC-7b
- Cumulative (2050) Conditions: Measures TC-16a, TC-16b and TC-16c
- 2025 Plus Project Conditions: Measures TC-30a and TC-30b

The "Existing Plus Project" analysis represents an unlikely condition, given the magnitude of planned development in the proposed Sphere of Influence. In reality, the City will develop over the 45-year planning period of the General Plan, as dictated by market absorption rates, and many mitigation measures would not be needed for some time in the future. The Existing Plus Project analysis was conducted for CEQA purposes.

Commenter also states that it may not be feasible to fund and construct all of the transportation improvements referenced in the Draft EIR. All of the measures listed above involve improvements to State Route (SR) 65 and improvements to the State Highway System and will take time to plan, fund, and construct. As shown in Tables 5-12 and 5-51 of the Draft EIR, much of State Route (SR) 65 already operates at level of service (LOS) F conditions and would operate at LOS F conditions under the 2025 No Project scenario.

The City shares Caltrans' concern that it will take time to plan, fund, and implement improvements to SR 65. As discussed further in the response to Comment D-4, the City of Lincoln is working with regional agencies and their member jurisdictions to develop funding for improvements to SR 65 in Placer County.

**Response to Comment D-4:** Commenter states the importance for regional collaboration in developing and implementing transportation solutions. The City of Lincoln recognizes the magnitude of the projected growth in Placer County, its resulting increase in travel demand, and the need for a cooperative approach to plan, obtain funding, and implement transportation improvements to accommodate that growth, including improvements to the State Highway System in Placer County.

The City is working with the Placer County Transportation Planning Agency (PCTPA), the South Placer Regional Transportation Authority (SPRTA) and their member jurisdictions to develop a strategic "Transportation Expenditure Plan" that includes funding for improvements for State highways in Placer County. The Expenditure Plan includes a number of critical transportation projects and programs including construction of the SR 65 Lincoln Bypass, improvements to I-80 and SR 65, and construction of Placer Parkway.

The proposed funding components for the Expenditure Plan are as follows:

- Additional development fees
  - Tier 2 Fee
  - Transportation Uniform Mitigation Fee
- Transportation sales tax
- Existing and future State and Federal funds

The additional development fees will need to be adopted by each of the jurisdictions in South Placer County. The City of Lincoln supports implementation of the Transportation Expenditure Plan to fund regional improvements in South Placer County. The City will support Caltrans and regional agencies in efforts to:

- 1) Secure as much Federal and State funding for improvements to SR 65 as possible, including funds for the transportation bond measure approved by the voters in 2006.
- 2) Place an appropriate transportation sales tax measure on a future Placer County ballot for regional transportation improvements, and
- 3) Establish additional impact fees so that development throughout South Placer County pays their fair share of the unfunded cost of regional improvements, including improvements to SR 65

In addition, please see the response to Comment D-3.

**Response to Comment D-5:** Commenter is pleased with the inclusion of goals and policies that could result in reduced trip distances and encouragement of trip linkages as well as bicycle, pedestrian, transit, and electric vehicle trips. This comment does not require a specific response.

**Response to Comment D-6:** Commenter notes the lack of full build-out of the Draft 2050 General Plan in the transportation impact analysis. Commenter states that as additional build-out beyond the analysis included in the Draft EIR occurs, a supplemental or updated impact analysis will be required or conducted. The cumulative traffic impacts in the Draft EIR are based on 2050 development estimates for Placer County. Full build-out of residential uses is expected by 2050, but non-residential uses in the City's Draft 2050 General Plan may take up to 100 years to fully develop. On or before the time that development of non-residential land in the City's proposed Sphere of Influence reaches the levels projected in the Draft EIR, the City would update the Draft 2050 General Plan and its horizon year and evaluate development levels beyond those identified in the Draft EIR.

**Response to Comment D-7:** In light of the "significant and unavoidable" impact conclusions for traffic impacts, Commenter requests that the City aggressively optimize the design and feasible mitigation strategies to reduce impacts. The Draft EIR has identified mitigation measures on the State Highway System and as discussed in the response to Comment D-4 above; the City is working with regional agencies and other jurisdictions to aggressively pursue funding for transportation regional improvements that would reduce impacts on the State Highway System.

**Response to Comment D-8:** Commenter recommends developing viable alternate parallel arterials to SR 65. Commenter also notes that consideration be given to provide for a highway over-crossing or underpass between the Nelson Road interchange and the Ferrari Ranch Road interchange. The City recognizes the need to develop north-south parallel roadways to reduce projected travel demand on SR 65 as well as on Fiddymment Road. The land between Fiddymment Road and SR 65 north of Athens Road is currently unincorporated Placer County, but this area is proposed to be included in the City's Sphere of Influence. Placer County's General Plan identified the need for a future north-south roadway between Industrial Road and Fiddymment Road that would connect the Sunset Industrial Area Plan with the City of Lincoln. However, this area contains one of the largest concentrations of vernal pool complexes in Placer County.

Much of the land north of Athens Road between Industrial Road and Fiddymment Road is already in a conservation preserve, and most of the remaining land is proposed to be in a reserve under all of the alternatives for the Placer County Conservation Plan (PCCP). The PCCP is intended to address the impacts associated primarily with unincorporated growth in west Placer and growth associated with the buildout of Lincoln's updated General Plan. Both the County and the City recognize that construction of a north-south roadway through the area between Industrial Road and Fiddymment Road is infeasible.

The Draft EIR identifies a Mitigated Roadway Network that includes six lanes on Fiddymment Road and the extension of Dowd Road south of Athens Road. Combined with the future Westside Drive in the City of Roseville's West Plan, the Dowd Road Extension would create a north-south route that connects the City of Lincoln to Roseville, the proposed developments in

Placer County (that were assumed to be fully built out by 2050), and the Watt Avenue corridor in Sacramento County. The Mitigated Roadway Network combined with the widening of Industrial Avenue and East Lincoln Parkway that are part of the Draft 2050 General Plan would substantially increase north-south roadway capacity parallel to SR 65.

Collector roadways that will serve the new growth areas of the City's Draft 2050 General Plan will be defined when specific plans are prepared for each plan area, including Special Use District B (SUD-B) which includes the southeast quadrant of the Nelson Lane/SR 65 interchange.

During the preparation of the Circulation Element of the Draft General Plan, the benefits of providing overpasses or underpasses to SR 65 between the planned freeway interchanges was evaluated under 2050 conditions. While several such crossings were found to be beneficial and were thus included in the Draft General Plan, the traffic analysis indicated little benefit from a crossing between the Nelson Lane and Ferrari Ranch Road. If provided, this crossing would not substantially reduce traffic volumes on Nelson Lane or Ferrari Ranch Road. Therefore, this crossing was not included in the Draft General Plan.

**Response to Comment D-9:** Commenter requests additional information regarding future possible drainage or retention sites. The volumetric mitigation is for a storm set as an 8-day duration, and this typically would not be related to a peak flow type event. The mitigation for volume identified in the Draft EIR is for an event where the Sacramento River backs up into the Natomas Cross Canal tributary lowlands at Sutter County. These areas are well downstream of the Caltrans facilities. The types of events characterized as being of impact to Caltrans facilities are of a peak storm duration of 24-hours or less in and around the City of Lincoln. Mitigation for these events is provided for in the peak flow mitigation or detention mitigation. These mitigation measures will be developed on a project by project or specific plan area basis as individual projects proposed under the Draft 2050 General Plan are considered by the City. As required by policies LU-15.1 and LU-16.1, no proposed projects within a Village or Special Use District will be able to move forward with a development project without first developing a Specific Plan for the entire Village or Special Use District. Those policies provide as follows:

- **Policy LU-15.1 Village Specific Plans/General Plan Amendment** The City shall require the completion and approval of a specific plan and associated General Plan Amendment prior to development of land within an area designated as a Village. *[New Policy]*
- **Policy LU-16.1 Development Area Specific Plans.** The City shall require the completion and approval of a specific plan to guide future development within the designated SUD. *[New Policy]*

**Response to Comment D-10:** Commenter states it is looking forward to working with the City and provides contact information. This comment does not require a specific response.

### ***Letter E. California Department of Water Resources***

**Response to Comment E-1:** Commenter states that the Proposed Project may occur on an adopted flood control plan. If the Proposed Project does encroach on a flood control plan, then an encroachment permit must be obtained. The Background Report for the Proposed Project, an

attachment to the EIR, discusses potential flooding hazards on pages 8-34 through 8-39. The Draft EIR discusses flooding impacts with stormwater drainage impacts under Impacts PFS-9, PFS-10, and PFS-11 (see pages 6-22 through 6-28). Consistent with a programmatic EIR, specific construction-related activities for each individual project anticipated under the Proposed Project were not analyzed in the Draft EIR. Additionally, it is assumed that as specific site plans and facilities are planned, the City will evaluate each project's encroachment on a flood plain area and identify the need to obtain an encroachment permit. For additional information related to the scope and contents of a program-level EIR, please refer to Master Response #2.

### ***Letter F. County of Placer Community Development Resource Agency***

**Response to Comment F-1:** Commenter states that the Draft 2050 General Plan policies should provide more detail and establish specific criteria on which to base a compatibility analysis to determine City and County land use compatibility and states that providing an appropriate transition to the County's zoning districts will be necessary to preserve the County's rural/agricultural areas. As noted by Commenter, the County's zoning varies from 4.6 acre minimums to 80 acre minimums. In the easterly and northeasterly areas of the Draft 2050 General Plan (Villages 1, 2, and 3) the County's zoning is generally smaller rural residential parcels with limited agricultural activity; while the western and southwestern portions (Villages 4, 5, and 6) of the County typically maintain the 80 acre minimum zoning allowing for a broader range of agricultural activity.

The variety of adjoining land uses does not lend itself to a single set of criteria that could be used to evaluate an appropriate buffer in every situation. Land Use Policy 5.4 states that the City shall require that agricultural land uses designated for long-term protection shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, sound-walls, fencing and berming. This policy will be implemented in conjunction with Land Use Policy 15-1, which requires the completion and approval of a Specific Plan prior to development of land within any Village. During the development of a specific plan for each Village area, specific conditions and details of the buffers will be established based upon the exact nature of the surrounding land uses. See Master Response # 2.

**Response to Comment F-2:** Commenter asks what land use designations constitute urban uses in Policy LU-9.6. Policy LU-9.6 states, "The City shall maintain a distinct urban edge, while creating a gradual transition between urban uses and open space." Urban land uses would include those typically found within a municipality, including a range of residential land uses, commercial, industrial, and public facilities; please refer to Table 4.1 page 4-5 of the Goals and Policy Report.

Commenter also asks which criteria are proposed to determine whether a gradual transition, as that term is used in Policy LU-9.6, is achieved. This policy is not solely directed at a situation of transition between urban land use and open space in the adjoining unincorporated areas. This policy along with others is organized under the Land Use Goal LU-9 (to ensure high quality appearance and harmony between existing and new uses, while avoiding repetitive style, height, and mass) and also speaks to the relationship between land uses occurring within the City limits, not just those occurring between the City's edge and the unincorporated areas of the County.

Regarding the criteria that would be used in determining an appropriate transition, this level of planning detail will occur during the crafting of a Specific Plan for each of the Village and Special Use Districts. The General Plan provides a series of policies that will be used to guide such determination, (see Policies LU-1.4, LU-2.7, LU-2.10, LU-4.1, LU-5.4, LU-9.8, LU-12.4, OSC-1.3, and OSC-2.1) as the circumstances of each planning area is assessed. Those policies read as follows:

- **Policy LU-1.4 Buffer.** The City shall require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands. *[New Policy]*
- **Policy LU-2.7 Compatible Uses.** The City shall work with neighboring jurisdictions in planning contiguous areas in order to ensure compatible land uses. *[Revised Land Use Element Policy 4.8]*
- **Policy LU-2.10 Airport Buffer.** Protect existing and planned local air transportation facilities from encroachment by potentially incompatible land uses and require developers to file an aviation easement with the City if a proposed development or expansion of an existing use is located in an area subject to a designated overlay district within the Placer County Airport Land Use Compatibility Plan (ALUCP). *[Revised Land Use Element Policy 4.12]*
- **Policy LU-4.1 Buffer Incompatible Uses.** The City shall require that industrial land uses be buffered from incompatible land uses and protected from encroachment by residential or other incompatible land uses through the use of techniques including, but not limited to, landscaping, soundwalls, berms, fencing, open space setbacks, greenbelts, and building orientation. *[Existing Land Use Element Policy 4.20]*
- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use element Policy 4.29]*
- **Policy LU-9.8 Integrate Natural Features.** The City shall emphasize Lincoln's natural features as the visual framework for new development and redevelopment. *[New Policy]*
- **Policy LU-12.4 Creek Natural Edges.** Where feasible, the City should preserve the existing natural edges along the City's creek system and wetland areas and restore impacted creeks by planting natural vegetation. *[New Policy]*
- **Policy OSC-1.3 Creation of Buffers.** In new development areas, the city shall encourage the use of open space or recreational buffers between incompatible land uses. *[New Policy]*

- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*

Additionally, Commenter is referred to Master Response # 2.

**Response to Comment F-3:** Commenter requests clarification of the language presented in the Draft 2050 General Plan related to the guiding principles and descriptions for each of the proposed Villages in terms of what criteria is proposed to define the terms “adequate transition” and “buffer.” As stated in Master Response #2, this Draft EIR is a Program EIR. It would be premature to, at this time, develop specific widths for the buffers or transitions. Instead, the City has proposed the following numerous policies, which provide that the City will address these issues at the appropriate time:

- **Policy LU-1.4 Buffer.** The City shall require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands. *[New Policy]*
- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use Element Policy 4.29]*
- **Policy LU-12.4 Creek Natural Edges.** Where feasible, the City should preserve the existing natural edges along the City’s creek system and wetland areas and restore impacted creeks by planting natural vegetation. *[New Policy]*
- **Policy LU-12.8 Site Planning.** The City shall encourage site planning that incorporates creek and wetland edges into the overall development. *[New Policy]*
- **Policy OSC-1.1 Protect Natural Resources.** The City shall strive to protect natural resource areas, fish and wildlife habitat areas, scenic areas, open space areas and parks from encroachment or destruction by incompatible development. *[Modified Existing Policy 1, Open Space, Conservation and Recreation Element]*
- **Policy OSC-1.3 Creation of Buffers.** In new development areas, the City shall encourage the use of open space or recreational buffers between incompatible land uses. *[New Policy]*
- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*

Additionally, Commenter is referred to the response prepared for Comment F-1.

**Response to Comment F-4:** Commenter requests clarification of policy language regarding the phrases “agricultural land uses” and “agricultural operations.” There is no distinction intended in the use of the phrases for purposes of policy implementation. The phrase “agricultural land uses” will be used universally. In terms of Land Use Policy 5.4 concerning agricultural buffers, the use of the phrase “agricultural land uses designated for long-term protection” is intended to reflect the distinction between agricultural land uses located outside the City’s proposed Sphere of Influence that are intended to remain in agricultural uses and those agricultural areas that would be within the City’s Sphere of Influence and would be expected to eventually be incorporated into the City.

The design and placement of the buffers noted in Policy 5.4 are intended to address the conditions along the perimeter of the proposed Sphere of Influence and serve as a permanent interface with the surrounding agricultural land uses. The treatment of agricultural land uses that are within the Sphere of Influence would be different given the expectation that eventually these areas would be incorporated into the City. Given the transitional nature of such uses, it is likely that measures would include providing notice to buyers regarding the County’s Right to Farm Ordinance, design solutions involving setbacks, fencing and berming, as well as the use of minimal exterior lighting among others. These situations would not typically be viewed as locations where large permanent buffers would be utilized. As required by Draft 2050 General Plan policies LU-15.1 and LU-16.1, proposed projects within a Village or Special Use District will be required to first develop a Specific Plan for the entire Village or Special Use District. During the review of the Specific Plan, issues of transitional uses would be addressed based upon detailed information. The draft Specific Plans will also be submitted to the County for review and comments regarding the design of the transitional areas.

**Response to Comment F-5:** Commenter requests further clarification of the discussion of Transitional Neighborhoods, found on page 4-38 of the Goals and Policy Report. As noted in the discussion of Transitional Neighborhoods, these are situations in which the edge of a Village may adjoin environmentally sensitive areas, agricultural areas, or rural residential areas. In order to be responsive to the variety of field conditions that may exist along the edge of a particular Village area, those details will be determined when a specific plan is developed for that particular Village. As noted in the response to Comment F-1, prior to the approval of any development of land within a Village, a specific plan must be developed for the entire Village. During this process, the details of transitions will be worked out based upon exact field conditions and the proposed land uses. Concepts such as natural vegetation along roadways, minimal exterior lighting, open fencing designs, and similar measures are potential aspects of designing transitional areas as part of developing each individual specific plan. The specific plans will also be submitted to the County for review and comment. Please refer to Master Response #2 for additional information regarding design criteria and standards..

**Response to Comment F-6:** Commenter requests that additional language be provided in the Goals and Policy Report of the Draft 2050 General Plan to address land use compatibility with the surrounding 20-acre and 80-acre parcels in the unincorporated area that adjoins Special Use District – A of the Draft 2050 General Plan. Currently, the proposed plan for Special Use District –A includes an agricultural land use along the northern portion of the district. This area is also part of the southern floodway for Coon Creek and is intended to provide a transition into the

unincorporated areas to the north that contain the 20 acre and 80 acres parcels. The Draft 2050 General Plan does currently address the issue of land use compatibility. Policies such as LU-5.4, which requires buffering of long term agricultural uses applies to the Special Use Districts as well as the Village areas and other land uses within the Planning Area..

**Response to Comment F-7:** Commenter requests the City identify what measures are proposed to address land use compatibility issues along the City/County line. The Draft EIR on pages 4-26-27, identifies the Draft 2050 General Plan policies that address issues of compatibility and buffers. Commenter is also directed to the responses prepared for Comments F-1 and F-4.

**Response to Comment F-8:** Commenter notes that Policy T-2.20 requires the City to coordinate with neighboring jurisdictions to address regional transportation issues. As discussed in the response prepared for Comment D-4, the City supports PCTPA’s efforts to define and implement the Transportation Expenditure Plan that will fund improvements to the major transportation system serving Placer County, including improvements to SR 65 and construction of Placer Parkway. As noted in the response to Comment D-4, the Expenditure Plan calls for the Tier 2 fee program as well as other funding methods. Also see Response to Comment Q-8.

**Response to Comment F-9:** Commenter states that for any identified mitigation measure, there must be a description of how improvements will be funded and who will construct the proposed improvements. The City concurs with this comment and follows such a process as part of the implementation of its Draft 2050 General Plan. As part of the analysis, infrastructure improvements are identified and then placed into the City’s Public Facilities Element fee program. The City will conduct the required nexus analysis in establishing the costs of the improvements and the fees assessed upon new development to fund the identified infrastructure. The Public Facilities Element fee program is also the basis upon which the City may require developers to construct improvements that are identified in the program and to receive credits against their impact fees.

**Response to Comment F-10:** Commenter states that a Draft 2050 General Plan policy should be created that would require the City to incorporate the entire roadway when annexation occurs. The Placer County Local Agency Formation Commission presently has policies that address such issues, and the City will follow these procedures as part of any future application for annexation.

**Response to Comment F-11:** Commenter requests clarification about land use assumptions used in trip-generation numbers. Like some other jurisdictions in Placer County, the supply of residential land in the Draft 2050 General Plan is expected to build out well before non-residential land. The residential uses are expected to develop over the 45-year planning period of the General Plan – by 2050. The commercial and industrial land in the Draft 2050 General Plan may take 100 years to fully develop.

As noted in the Draft EIR, the Cumulative (2050) development scenario for traffic impacts is based on the so-called “Super-Cumulative” development scenario that covers all of Placer County. This development scenario was prepared for the evaluation of traffic impacts in several recent EIRs for major developments in Placer County, including the proposed Placer Vineyards, Placer Ranch, Rio Vineyards, and regional University developments.

The Super-Cumulative scenario was prepared during discussions with the staffs of Placer County and the cities of Roseville, Rocklin, and Lincoln. In those discussions, it was recognized that 1) collectively there was an abundance of non-residential land and 2) that commercial and industrial development would take substantially longer to develop than residential development. Therefore, the County staff agreed that it would be appropriate to generally balance the amount of jobs with housing in Placer County and thereby balance trip-making.

It should be noted that the amount of both residential and non-residential development in Placer County as a whole and in the City's Sphere of Influence under the Cumulative (2050) development scenario is approximately equal to the amount of jobs and housing projected by SACOG for 2050. The Super-Cumulative scenario attempts to represent a market-based development scenario for 2050.

The land uses in the Draft 2050 General Plan were not modified to match the Draft EIR assumptions related to the balancing of jobs/housing. The City recognizes that non-residential uses will continue to develop beyond the 45-year planning period of the General Plan. Much of the non-residential land in the Draft 2050 General Plan could not be converted to residential uses because of its location near the Lincoln Airport. It should be noted that if the land near the airport is converted to residential uses, it would be very low density to meet federal requirements. Such a land use scenario would 1) not generate substantially more trips than the 2050 "balanced" development forecast evaluated in the Draft EIR and 2) such low residential densities do not meet the objectives of the General Plan. The trip generation for 2050 development levels is accurately reported in the Draft EIR.

For the 1993 General Plan EIR, Placer County based the cumulative traffic analysis on market-based estimates of development for the 2010 horizon year of its General Plan. The County's 1993 General Plan EIR did not evaluate build-out of its non-residential uses, including the Sunset Industrial Plan Area, since that land would take many years to build out. The City of Lincoln is justified in basing its cumulative traffic impacts on expected development levels over a long period – the 2050 horizon year of its Draft General Plan.

On or before the time that development of non-residential land in the City's proposed Sphere of Influence reaches the levels projected in the Draft EIR, the City would update the Draft 2050 General Plan and its horizon year and evaluate development levels beyond those in the Draft EIR.

**Response to Comment F-12:** Commenter requests clarification of the estimated number of regional trips identified in the analysis on page 5-20 of the Draft EIR and asks whether the trips were reduced after the model run. Trips were not reduced before or after the Placer County Travel Demand Model was run to estimate traffic volumes under the Draft General Plan. There is no underestimation of regional trips. The trip rates in Tables 5-16 and 5-17 (of the Draft EIR) are those used in the travel demand and reflect "trip ends." The discussion on Page 5-20 of the Draft EIR is intended to describe the difference between "trip ends" and "trips," which can also be described in the following example:

A person makes a trip from home to a store and a second trip back to home from the store. In the travel demand model, that person's travel is described by two "trip ends" at home (the trip end leaving the driveway at home and the trip end entering the driveway

when returning home) and two trip ends at the store (the trip ends entering and exiting the store's driveway). There are four "trip ends" to describe two vehicle "trips."

The intent of the discussion on Page 5-20 (of the Draft EIR) was to indicate that the trip generation rates used to calculate the number of vehicle "trips ends" is not equal to the number of vehicle "trips" assigned by the travel model to the roadway network. The travel demand model uses the same trip rates to calculate vehicle "trip ends" and uses these "trip ends" to calculate vehicle "trips" between origins and destinations.

**Response to Comment F-13:** Commenter states that a discussion of a local funding source for roadways be identified in the discussion of transportation improvements in the proposed sphere of influence on page 5-21 of the DEIR. The source of funding for the specified roadway improvements will vary. Nelson Lane lies within the City's Sphere of Influence, and its realignment would be funded by local sources. New interchanges along the SR 65 Lincoln Bypass would also be funded by the development they serve. Traffic on the SR 65 mainline comes from throughout the region, and the City would work with regional agencies to pursue a mix of federal, state, and local funding for those improvements. The Dowd Road extension would connect Western Lincoln with a "backdoor" connection to Placer Ranch and with Westside Drive in the City of Roseville. Thus, this roadway serves three jurisdictions. The City is prepared to work with other jurisdictions to fund this roadway. Also see Response Comment Q-8.

**Response to Comment F-14:** Commenter inquires as to whether or not the City is intending to annex as far as the south side of Athens Avenue and states that Athens Avenue is not listed in Table 5-18. The City of Lincoln's current Sphere of Influence includes parcels that front onto Athens Avenue between Industrial Blvd and Fiddymont Road. Should the City annex such parcels it is anticipated that Placer County LAFCo policies will require the City and County to reach an agreement regarding maintenance responsibilities for Athens Avenue.

**Response to Comment F-15:** Commenter requests that if an intersection within the County's jurisdiction operates at a LOS below the County standard, appropriate mitigation be identified to increase the LOS to an acceptable level where feasible. The Standard of Significance in the DEIR for impacts on Placer County roadways is consistent with the Standard of Significance used by Placer County in the Revised DEIR for the Placer Vineyards Specific Plan. For roadways and intersections that would operate at an unacceptable LOS without the project, the County used a 5% increase in the volume to capacity ratio as a threshold for defining impacts. If an impact was defined under this Standard of Significance, mitigation measures were identified that would increase the LOS to the level under No Project conditions where feasible.

**Response to Comment F-16:** Commenter states that Mitigation Measure TC-1B on page 5-34 of the DEIR needs to include a grade separated crossing of the tracks on Athens Avenue near Industrial Boulevard. Much of the existing traffic on Athens Road is generated by the Thunder Valley Casino and the Western Regional Sanitation Landfill, and much of the expected growth in traffic on Athens Road would come from growth related to development outside the City of Lincoln, including expansion of the casino and from the proposed Placer Ranch development. The grade separation is not needed to meet a level of service impact from growth under the City's Draft General Plan.

**Response to Comment F-17:** Commenter requests that any roadways identified in comments on the Notice of Preparation that were not initially analyzed in the Draft EIR should be analyzed and appropriate mitigation be identified where necessary. The following tables summarize the roadway segment analysis for the roadway segments requested by Placer County. On many of the additional segments, a peak hour intersection analysis was conducted at the major intersections on those segments. For two very short roadway segments, South Loop Road and Placer Corporate Center Drive, a roadway segment analysis is not appropriate since the intersection LOS analysis provided in the Draft EIR adequately covers impacts on these roadway segments.

For the roadway segments not included in the Draft EIR, the analysis summarized in revised versions of Tables 5-20, 5-29, 5-37 and 5-45 below confirms the intersection LOS impact analysis and mitigation measures in the Draft EIR.

Under Existing Plus Project conditions (see Revised Table 5-20); LOS impacts were identified on two additional roadway segments:

- Fiddymment Road south of Athens Avenue
- Industrial Avenue south of Athens Avenue.

The roadway segment LOS impact on Fiddymment Road south of Athens Avenue is consistent with the intersection LOS impacts reported in the Draft EIR at the Fiddymment Road/Athens Avenue and Fiddymment Road/Sunset Boulevard West intersections. The mitigation measures at both intersections (TC-1a and TC-2a), the widening of Fiddymment Road to four lanes, is consistent with a measure that would mitigate the roadway segment LOS impact on the Fiddymment Road south of Athens Avenue – the widening of Fiddymment Road to four lanes from Athens Avenue to Sunset Boulevard West.

The roadway segment LOS impact on Industrial Avenue south of Athens is consistent with the intersection LOS impacts reported in the Draft EIR at the Industrial Avenue/Athens Avenue and Industrial Avenue/Placer Corporate Drive intersections. The mitigation measure at both intersections (TC-1b and TC-2b), the widening of Industrial Avenue to four lanes, is consistent with a measure that would mitigate the roadway segment LOS impact on the Industrial Avenue south of Athens Avenue – the widening of Industrial Avenue to four lanes from Athens Avenue to Placer Corporate Drive.

**REVISED TABLE 5-20  
DAILY LEVELS OF SERVICE ON STUDY ROADWAYS IN  
UNINCORPORATED PLACER COUNTY EXISTING PLUS PROJECT CONDITION**

Study Roadway	Roadway Section	Existing Conditions		Existing Plus Project	
		Average Daily Traffic <sup>1</sup>	Level of Service	Average Daily Traffic <sup>1</sup>	Level of Service
Wise Road	East of Brewer Road	300	A	500	A
Wise Road	West of Road "A"	300	A	500	A
Wise Road	East of McCourtney Road	4,600	A	9,400	A
Wise Road	West of Gold Hill Rd	1,200	A	2,900	A

**REVISED TABLE 5-20  
DAILY LEVELS OF SERVICE ON STUDY ROADWAYS IN  
UNINCORPORATED PLACER COUNTY EXISTING PLUS PROJECT CONDITION**

Study Roadway	Roadway Section	Existing Conditions		Existing Plus Project	
		Average Daily Traffic <sup>1</sup>	Level of Service	Average Daily Traffic <sup>1</sup>	Level of Service
Fruitvale Road	East of McCourtney Road	900	A	600	A
Nicolaus Road	West of Brewer Road	2,600	A	11,700	B
Nicolaus Road	East of Brewer Road	2,500	A	12,200	B
Virginiatown Road	East of McCourtney Road	1,800	A	9,500	A
Moore Road	West of Brewer Road	200	A	3,000	A
Moore Road	East of Brewer Road	200	A	3,000	A
Moore Road	West of Road "A"	200	A	3,000	A
Catlett Road	West of Brewer Road	900	A	1,100	A
Catlett Road	East of Brewer Road	900	A	6,000	A
Catlett Road	West of Athens Avenue	900	A	6,000	A
Brewer Road	South of Catlett Road	100	A	5,100	A
McCourtney Road	South of Wise Road	3,200	A	2,000	A
Dowd Road	North of Wise Road	2,700	A	1,000	A
Dowd Road	South of Riosa Road	2,600	A	800	A
Fiddymment Road	South of Athens Avenue	5,600	A	<b>27,300</b>	<b>F</b>
Fiddymment Road	North of Roseville City limit	4,400	A	13,272	C
Industrial Ave	South of Athens Avenue	13,500	C	<b>23,100</b>	<b>F</b>
Industrial Ave	North of Placer Corp Dr	18,300	F	25,400	F

Highlighted roadway segments were not included in DEIR

Source: DKS Associates, 2007.

Under Cumulative Plus Project conditions (see Revised Table 5-29); LOS impacts were identified on three additional roadway segments:

- Fiddymment Road south of Athens Avenue
- Fiddymment Road north of Blue Oaks Boulevard
- Industrial Avenue south of Athens Avenue.

The roadway segment LOS impacts on Fiddymment Road south of Athens Avenue and north of the Roseville City limits are consistent with the intersection LOS impacts reported in the Draft EIR at the Fiddymment Road/Athens Avenue, Fiddymment Road/Sunset Boulevard West and Fiddymment/Placer Ranch Road intersections. The mitigation measure TC-10, the widening of Fiddymment Road to six lanes from Athens Avenue to Placer Parkway and the extension of Dowd Road, is consistent with a measure that would reduce the roadway segment LOS impacts on Fiddymment Road both south of Athens Avenue and north of the Roseville City limit.

The roadway segment LOS impact on Industrial Avenue south of Athens Avenue is consistent with the intersection LOS impact reported in the Draft EIR at the Industrial Avenue/Placer Corporate Drive intersection. The mitigation measure TC-10, the widening of Fiddymment Road to six lanes from Athens Avenue to Placer Parkway and the extension of Dowd Road, is consistent with a measure that would reduce the roadway segment LOS impacts on Industrial Avenue south of Athens Avenue.

The Cumulative Plus Project without Placer Parkway conditions (see revised Table 5-37) LOS impacts were identified on three additional roadway segments:

- Fiddymment Road south of Athens Avenue
- Fiddymment Road north of Blue Oaks Boulevard
- Industrial Avenue south of Athens Avenue.

The roadway segment LOS impacts on Fiddymment Road south of Athens Avenue and north of the Roseville City limits are consistent with the intersection LOS impacts reported in the Draft EIR at Fiddymment/Placer Ranch Road intersections. The mitigation measure TC-10, the widening of Fiddymment Road to six lanes from Athens Avenue to Placer Parkway and the extension of Dowd Road, is consistent with a measure that would mitigate the roadway segment LOS impacts on Fiddymment Road both south of Athens Avenue and north of the Roseville City limit.

The roadway segment LOS impact on Industrial Avenue south of Athens Avenue is consistent with the intersection LOS impact reported in the Draft EIR at the Industrial Avenue/Athens Avenue intersection. The mitigation measure TC-10, the widening of Fiddymment Road to six lanes from Athens Avenue to Placer Parkway and the extension of Dowd Road, is consistent with a measure that would mitigate the roadway segment LOS impacts on Industrial Avenue south of Athens Avenue.

**REVISED TABLE 5-29  
DAILY LEVELS OF SERVICE ON STUDY ROADWAYS IN UNINCORPORATED PLACER COUNTY CUMULATIVE PLUS PROJECT CONDITION**

Study Roadway	Roadway Section	Cumulative No Project		Cumulative Plus Project		Cumulative Plus Project Mitigated	
		Average Daily Traffic	Level of Service	Average Daily Traffic	Level of Service	Average Daily Traffic	Level of Service
Wise Road	East of Brewer Road	100	A	2,800	A	2,500	A
Wise Road	West of Road "A"	100	A	2,800	A	2,500	A
Wise Road	East of McCourtney Road	8,700	A	12,000	B	11,900	B
Wise Road	West of Gold Hill Rd	3,000	A	3,700	A	3,600	A
Fruitvale Road	East of McCourtney Road	800	A	700	A	700	A
Nicolaus Road	West of Brewer Road	6,700	A	14,400	C	12,000	B
Nicolaus Road	East of Brewer Road	7,100	A	<b>15,200</b>	<b>D</b>	12,600	B
Virginiatown Road	East of McCourtney Road	9,500	A	9,000	A	8,900	A
Moore Road	West of Brewer Road	200	A	1,600	A	400	A
Moore Road	East of Brewer Road	300	A	1,700	A	500	A
Moore Road	West of Road "A"	300	A	1,700	A	500	A
Catlett Road	West of Brewer Road	4,100	A	1,700	A	3,900	A
Catlett Road	East of Brewer Road	4,200	A	4,300	A	4,500	A
Catlett Road	West of Athens Avenue	4,200	A	4,300	A	4,500	A
Brewer Road	South of Catlett Road	100	A	2,800	A	500	A
McCourtney Road	South of Wise Road	4,700	A	5,400	A	5,300	A
Dowd Road	North of Wise Road	300	A	1,400	A	1,300	A
Dowd Road	South of Riosa Road	100	A	1,000	A	1,000	A
Fiddymment Road	South of Athens Avenue	26,900	C	<b>61,600</b>	<b>F</b>	<b>54,000</b>	<b>E</b>
Fiddymment Road	North of Roseville City limit	48,600	D	<b>52,300</b>	<b>E</b>	47,400	D
Industrial Ave	South of Athens Avenue	28,200	C	<b>35,100</b>	<b>E</b>	<b>32,400</b>	<b>D</b>
Industrial Ave	North of Placer Corp Dr	39,900	F	43,800	F	39,900	F

Highlighted roadway segments were not included in DEIR  
Source: DKS Associates, 2007.

**REVISED TABLE 5-37**  
**DAILY LEVELS OF SERVICE ON STUDY ROADWAYS IN UNINCORPORATED PLACER COUNTY**  
**CUMULATIVE PLUS PROJECT CONDITION – WITHOUT PLACER PARKWAY**

Study Roadway	Roadway Section	Cumulative No Project		Cumulative Plus Project		Cumulative Plus Project Mitigated	
		Average Daily Traffic <sup>1</sup>	Level of Service	Average Daily Traffic <sup>1</sup>	Level of Service	Average Daily Traffic <sup>1</sup>	Level of Service
Wise Road	East of Brewer Road	100	A	3,600	A	3,900	A
Wise Road	West of Road "A"	100	A	3,600	A	3,900	A
Wise Road	East of McCourtney Road	9,000	A	12,200	B	12,500	B
Wise Road	West of Gold Hill Rd	3,000	A	3,700	A	3,600	A
Fruitvale Road	East of McCourtney Road	800	A	700	A	700	A
Nicolaus Road	West of Brewer Road	13,400	C	<b>19,400</b>	<b>F</b>	<b>19,600</b>	<b>F</b>
Nicolaus Road	East of Brewer Road	13,800	C	<b>20,600</b>	<b>F</b>	<b>20,000</b>	<b>F</b>
Virginiatown Road	East of McCourtney Road	9,600	A	8,600	A	8,600	A
Moore Road	West of Brewer Road	2,500	A	6,000	A	5,100	A
Moore Road	East of Brewer Road	2,600	A	6,900	A	5,300	A
Moore Road	West of Road "A"	2,600	A	6,900	A	5,300	A
Catlett Road	West of Brewer Road	4,800	A	7,400	A	7,100	A
Catlett Road	East of Brewer Road	2,600	A	8,700	A	8,400	A
Catlett Road	West of Athens Avenue	2,600	A	8,700	A	8,400	A
Brewer Road	South of Catlett Road	3,000	A	8,400	A	3,000	A
McCourtney Road	South of Wise Road	4,700	A	5,700	A	5,900	A
Dowd Road	North of Wise Road	500	A	1,400	A	1,300	A
Dowd Road	South of Riosa Road	200	A	1,000	A	1,000	A
Fiddymont Road	South of Athens Avenue	39,900	F	<b>71,500</b>	<b>F</b>	<b>55,000</b>	<b>F</b>
Fiddymont Road	North of Roseville City limit	53,800	E	<b>54,700</b>	<b>F</b>	52,800	E
Industrial Ave	South of Athens Avenue	28,900	D	<b>34,000</b>	<b>E</b>	30,100	D
Industrial Ave	North of Placer Corp Dr	40,600	F	42,300	F	38,000	F

Highlighted roadway segments were not included in DEIR

Source: DKS Associates, 2007.

**REVISED TABLE 5-45  
DAILY LEVELS OF SERVICE ON STUDY ROADWAYS IN UNINCORPORATED PLACER COUNTY  
2025 PLUS PROJECT CONDITION**

Study Roadway	Roadway Section	2025 No Project		2025 Plus Project	
		Average Daily Traffic <sup>1</sup>	Level of Service	Average Daily Traffic <sup>1</sup>	Level of Service
Wise Road	East of Brewer Road	100	A	2,900	A
Wise Road	West of Road "A"	100	A	2,900	A
Wise Road	East of McCourtney Road	10,000	A	12,400	B
Wise Road	West of Gold Hill Rd	3,000	A	4,000	A
Fruitvale Road	East of McCourtney Road	1,000	A	800	A
Nicolaus Road	West of Brewer Road	12,400	B	<b>18,600</b>	<b>F</b>
Nicolaus Road	East of Brewer Road	12,800	C	<b>20,300</b>	<b>F</b>
Virginiatown Road	East of McCourtney Road	9,100	A	9,400	A
Moore Road	West of Brewer Road	2,500	A	8,200	A
Moore Road	East of Brewer Road	2,600	A	9,100	A
Moore Road	West of Road "A"	2,600	A	9,100	A
Catlett Road	West of Brewer Road	4,200	A	7,400	A
Catlett Road	East of Brewer Road	3,600	A	<b>14,600</b>	<b>D</b>
Brewer Road	South of Catlett Road	1,600	A	<b>19,200</b>	<b>F</b>
McCourtney Road	South of Wise Road	6,500	A	6,100	A
Dowd Road	North of Wise Road	1,100	A	1,400	A
Dowd Road	South of Riosa Road	800	A	1,100	A
Fiddymment Road	South of Athens Avenue	29,000	F	<b>38,000</b>	<b>F</b>
Fiddymment Road	North of Roseville City limits	38,800	F	38,800	F
Industrial Ave	South of Athens Avenue	17,900	E	<b>22,700</b>	<b>F</b>
Industrial Ave	North of Placer Corp Dr	27,500	F	30,300	F

Highlighted roadway segments were not included in DEIR

Source: DKS Associates, 2007.

Under 2025 Plus Project conditions (see Revised Table 5-45); LOS impacts were identified on three additional roadway segments:

- Fiddymment Road south of Athens Avenue
- Industrial Avenue south of Athens Avenue

The roadway segment LOS impact on Fiddymment Road south of Athens Avenue is consistent with the intersection LOS impacts reported in the Draft EIR at the Fiddymment Road/Athens Avenue, Fiddymment Road/Sunset Boulevard West and Fiddymment/Placer Ranch Road intersections. The mitigation measures at both intersections (TC-24c and TC-25f) include the widening of Fiddymment Road to six lanes, which is consistent with a measure that would mitigate the roadway segment LOS impact on the Fiddymment Road south of Athens Avenue – the widening of Fiddymment Road to six lanes from Athens Avenue to Sunset Boulevard West.

The roadway segment LOS impact on Industrial Avenue south of Athens Avenue is consistent with the intersection LOS impacts reported in the Draft EIR at the Industrial Avenue/Athens Avenue and Industrial Avenue/Placer Corporate Drive intersections. The mitigation measures TC-24d and TC-25g, which include the widening of Fiddymment Road to four lanes, is consistent with a measure that would mitigate the roadway segment LOS impacts on Industrial Avenue south of Athens Avenue – the widening of Industrial Avenue to four lanes from Athens Avenue to Placer Corporate Drive.

**Response to Comment F-18:** Commenter requests clarification of whether or not full build-out of the Draft 2050 General Plan is used in the DEIR traffic analysis. As noted in the Draft EIR, the Cumulative (2050) development scenario for traffic impacts is based on the so-called “Super-Cumulative” development scenario that covers all of Placer County. This development scenario was prepared for the evaluation of traffic impacts in several recent EIRs for major developments in Placer County and was prepared following discussions with the staffs of Placer County and the cities of Roseville, Rocklin and Lincoln.

The development assumptions for cumulative conditions for each of the major proposed projects in Placer County are described in Table 5-13 in the Draft EIR. The 2050 Cumulative scenario included full buildout of the major developments in unincorporated Placer County that are listed on page 5-46 (of the Draft EIR). The non-residential development was not reduced.

**Response to Comment F-19:** Commenter states that the DEIR should analyze a scenario without the Dowd Road connection south of East Catlett Road. The Draft EIR does evaluate scenarios with and without the extension of Dowd Road. The cumulative 2050 conditions analysis of the Draft 2050 General Plan EIR (starting on page 5-46) documents impacts without the Dowd Road Extension. That analysis identified the Dowd Road extension as a potential mitigation measure to provide an acceptable level of service for Fiddymment Road. The Dowd Road Extension was then evaluated in the Draft EIR with the Cumulative Plus Project with Mitigated Network scenario.

As noted in the response to Comment F-13, the Dowd Road extension would connect Western Lincoln with a “backdoor” connection to Placer Ranch and with Westside Drive in the City of Roseville. Thus this roadway serves three jurisdictions. The City is prepared to work with other jurisdictions to fund this roadway. Also see Response to Comment Q-8.

**Response to Comment F-20:** Commenter states that the ADT volume identified on Figure 5-2 does not support the assertion, “the LOS on Brewer Road south of East Catlett Road would degrade to LOS E”, as stated on page 5-55 of the DEIR. It appears that Commenter is referring to

Figure 5-12, not Figure 5-2. The volumes for Brewer Road shown on Figure 5-12 are correct, but the impact statement regarding Brewer Road (bullet 2 on page 5-55) and the volumes shown for Brewer Road in Table 5-29 (of the Draft EIR) are incorrect. The impact statement incorrectly refers to the change in LOS that would occur on Pleasant Grove Road, not Brewer Road. The impact that would occur on Pleasant Grove Road in Sutter County is addressed on page 5-68 (of the Draft EIR). The proposed Draft 2050 General Plan would not cause an impact on Brewer Road under Cumulative (2050) Plus Project conditions but as indicated in the Draft EIR would cause an impact on Pleasant Grove Road in Sutter County.

Similarly, the volumes for Brewer Road in Table 5-37 of the Draft EIR are actually estimated volumes on Pleasant Grove Road in Sutter County. The impact statement on page 5-80 of the Draft EIR incorrectly refers to the change in LOS that would occur on Pleasant Grove Road, not Brewer Road. The impact that would occur on Pleasant Grove Road in Sutter County is addressed on page 5-92 of the Draft EIR. The proposed Draft 2050 General Plan would not cause an impact on Brewer Road under Cumulative (2050) Plus Project conditions without Placer Parkway, but as indicated in the Draft EIR would cause an impact on Pleasant Grove Road in Sutter County.

The correct volumes and LOS on Brewer Road are shown in the tables provided for the response to Comment F-17.

**Response to Comment F-21:** Commenter states that although the “Super-Cumulative” model has been used in recent EIRs, those EIRs mitigated to the 2025 scenario. Commenter states that this should be discussed in the DEIR. As noted, Placer County developed a 2025 development scenario for each of its EIRs that have been prepared, or are being prepared for major developments in the County. Traffic mitigations were based on the analysis of 2025 conditions. A “Super-Cumulative” development scenario was also prepared by the County for these EIRs. It has been determined that the Super-Cumulative scenario best represents development levels in 2050, which is the horizon year of the City’s Draft General Plan.

**Response to Comment F-22:** Commenter states that Mitigation TC-11i (see page 5-62 of the DEIR) should not be assumed to be feasible and the mitigated roadway network should be analyzed without this connection. The Draft EIR indicates that more than one “backdoor” roadway from the proposed Placer Ranch development to Dowd Road may be needed. If a connection to Dowd Placer from Placer Ranch Road is not considered feasible, the County should identify an alternative alignment for such a connection or an alternative mitigation measure. As noted on page 5-63 of the Draft EIR, while implementation of the mitigation measure would reduce the severity of the impact, this improvement lies outside the jurisdiction of the City of Lincoln. Placer County can and should implement the suggested or similar mitigation but may choose not to. If the identified improvement is not made, the intersection of Dowd Road and University Boulevard would continue to operate at an unacceptable level of service. Therefore, as noted in the Draft EIR, this impact remains significant.

**Response to Comment F-23:** Commenter inquires as to whether Mitigation Measures IC-16b and TC-16c would be feasible and whether the funding sources have been identified to construct such improvements. Mitigation measures 16b and 16c in the Draft EIR would mitigate the identified impacts to SR 65. Other freeways in California with severe right-of-way constraints have been widened to relieve congestion. As noted by Commenter, a widening of SR 65 to 8 lanes would be very challenging. As noted on page 5-72 of the Draft EIR, while implementation of these mitigation measures would reduce the severity of the impact, these improvements lie outside the jurisdiction of the City of Lincoln. Caltrans can and should implement the suggested or similar mitigation; but improvements to SR 65 would require regional funding, and Caltrans may choose not to make these improvements. If the identified improvements are not made, SR 65 would continue to operate at an unacceptable level of service. Therefore, as noted in the Draft EIR, this impact remains significant

**Response to Comment F-24:** Commenter notes that a superscript “1” on Table 5-5 (page 5-11 of the Draft EIR) does not have a reference or note at the end of the table. The Draft EIR will be modified to reflect this comment. The superscript “1” on Table 5-5 (see page 5-11 of the Draft EIR) should be an “a” and refer to the Footnote “a.” This correction has been made. Please see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment F-25:** Commenter inquires as to whether or not footnote “a” should be included for more than just one of the intersections identified in Table 5-5 (see page 5-11 of the Draft EIR). The note should be on all intersections with delay “<20.” This correction has been made. Please see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment F-26:** Commenter states that the Open Space and Conservation mitigation measures identified in the Draft EIR lack precise implementation strategies and descriptive mitigation measures. Pursuant to the requirements of a programmatic-level document for a similar general plan update, the EIR provides sufficient mitigation measures in the form of general plan policies. As more fully described above under Master Response #2 and the responses prepared for Comments A-8 and A-21, future planned projects may be required to complete project-level analysis of impacts and provide relevant mitigation where required.

**Response to Comment F-27:** Commenter states that the Draft EIR does not adequately address linkages with the proposed Placer County Conservation Plan or consider opportunities to provide contiguous open space/oak woodland connections with the West Roseville Specific Plan, the Central Valley Joint Venture American Basin Plan, or Placer Legacy open space objectives. The City of Lincoln is an active participant in the Placer County Conservation Plan (PCCP) and has coordinated its planning efforts with the County in terms of establishing potential reserve areas for the conservation plan. The PCCP is currently in the process of developing a plan, which has not at this time reached a conclusion with the federal and state resource agencies. Please see responses to Comments A-19, V-14, and V-18 concerning the PCCP.

Additionally, this document is a Program EIR, which is provided for under CEQA Guidelines section 15168(a). This document is a first tier analysis that assesses and documents the broad environmental impacts of a program with the understanding that more detailed site-specific

environmental reviews may be required to assess future projects, which will also require more specific mitigation measures to address identified impacts.

Draft 2050 General Plan policies LU15.1 and LU-16.1 require that Specific Plans be developed for each of the Villages and Special Use Districts before any development projects may proceed. It will be during the development and review of the subsequent Specific Plans where opportunities for linkages and provisions for contiguous open space will be properly evaluated. Please refer to Master Response #2 and #7.

**Response to Comment F-28:** Commenter states that the Draft EIR does not consider how the Proposed Project mitigation can assist with implementation of the Auburn Ravine/Coon Creek Ecosystem Restoration Plan recommendations. Please refer to the response prepared for Comment F-27, which addresses coordination with other local/regional habitat conservation efforts.

**Response to Comment F-29:** Commenter states that the Draft EIR did not address the designation of critical habitat for Central Valley Steelhead in Auburn Ravine and Coon Creek. Although the Draft EIR does not specifically state the locations of designated critical habitats, Impacts OSC-3, OSC-4, and OSC-6 identify potential impacts to all special status species, sensitive natural communities, and migratory corridors, which include impacts to the movement of migratory fish in Auburn Ravine and Coon Creek (see pages 7-11 through 7-15 and 7-17 through 7-18 of the Draft EIR). These impacts identify Policies OSC-5.1 and OSC-5.5 of the Draft 2050 General Plan as mitigation measures that would minimize these effects, but not to a less-than-significant level. Those policies provide for the protection of significant vegetation (Policy OSC-5.1), management of wetland and riparian plant communities (Policy OSC-5.2), coordination with Placer County and the Placer Legacy Open Space and Conservation Program (Policy OSC-5.3), encouragement of planting of native trees, shrubs, and grasslands (Policy OSC-5.4), and requiring new developments in areas that are known to have particular value for biological resources to be carefully planned and possibly avoided (Policy OSC-5.5). Additionally, Central Valley Steelhead is identified in Table 7-10 on page 7-62 of the Background Report as a special-status species with the potential to occur in the Planning Area.

Further, the City recirculated the “Biological Resources” section of the General Plan Background Report as part of the Recirculated Draft EIR (see pages 2.2-3 to 2.2-49) for the Draft 2050 General Plan Update. The updated “Biological Resources” section includes current regulatory information specific to local resource conditions and includes current habitat mapping data provided through the County’s conservation planning efforts.

**Response to Comment F-30:** Commenter states that the EIR needs to identify specific special-status species that will be potentially impacted by changing land uses under the proposed project. At this time, impacts to specific special-status species would be speculative. Although the General Plan Background Report provides a complete list of all the plant and wildlife special status species that currently have the potential to exist within the Planning Area, the Program EIR identifies on a broad-scale the impacts that could occur to all special status species through implementation of the Draft 2050 General Plan (see Impact OSC-3 on page 7-11).

Additionally, the City recirculated the “Biological Resources” section of the General Plan Background Report as part of the Recirculated Draft EIR (see pages 2.2-3 to 2.2-49) for the Draft 2050 General Plan Update. The updated “Biological Resources” section includes current regulatory information specific to local resource conditions and current habitat mapping data provided through the County’s conservation planning efforts. As more fully described above under Master Response #2, future projects would be required to undergo additional project-specific environmental review, which would identify the specific special-status species, if any, that would be potentially impacted.

**Response to Comment F-31:** Commenter states that migratory bird issues associated with the Pacific Flyway need to be addressed in the Draft EIR. Please refer to Impact OSC-6 on page 7-17 of the Draft EIR for a discussion of impacts to migratory wildlife. In addition, the City recirculated the “Biological Resources” section of the General Plan Background Report as part of the Recirculated Draft EIR (see pages 2.2-3 to 2.2-49 of the recirculated Draft EIR), which includes additional information regarding migratory birds. Also, please refer to the response prepared for Comment F-29.

**Response to Comment F-32:** Commenter suggests the General Plan promote wildlife/environmental friendly design, such as low impact development standards, maintaining or creating environmental corridors, and construction of fish and wildlife friendly bridges over stream crossings. With respect to low impact development strategies, please see response to Comment A-10. Additionally, the Draft 2050 General Plan includes policies that provide guidance on water quality issues. Please see response to Comment A-9.

**Response to Comment F-33:** Commenter states that the Draft EIR did not address the need for a minimum 100-foot setback for all perennial streams and maintaining at least a 50-foot setback for seasonal and intermittent waterways. Impacts PFS-9 and PFS-10 on pages 6-22 through 6-26 of the Draft EIR identify Policies PFS-4.9 and OSC-1.4 as mitigation for potential flooding or stormwater drainage impacts of the proposed project. These policies read as follows:

- **Policy PFS-4.9 100-year Floodplain.** The City will discourage development or major fill or structural improvements (except for flood control purposes) within the 100-year floodplain as regulate by FEMA. Requests for fill and improvements within the floodplain may be approved by the City based upon a detailed hydraulic volumetric analysis prepared to evaluate impacts and provide for any mitigation measures to be provided as a part of the development to the satisfaction of the City Engineer/Public Works Director. Recreational activities that do not conflict with habitat uses may be permitted within the floodplain. *[Modified Existing Policy, Public Facilities Element]*
- **Policy OSC-1.4 100-year Floodplains.** The city will apply open space designations to all lands located within the 100 year floodway as shown on the FIRM panel or as determined by a project drainage plan and approved by the City Engineer/Director of Public Works; The City will also apply open space designations to all 100-year floodplain fringe areas, and/or remaining floodplain fringe areas as determined by a project drainage plan identifying floodplain fringe encroachment areas, and quantifying

their impact along with other improvements to show a zero (0) net impact to the upstream, downstream and adjacent properties. Open space designations will apply to all land located within a minimum of 50 feet from the center channel of all perennial and intermittent streams and creeks providing natural drainage, and to areas consisting of riparian habitat. In designating these areas as open space, the city is preserving natural resources and protecting these areas from development. *[Modified Existing Action Plan Policy 1, Open Space, Conservation and Recreation Element]*

These policies designate as open space all land located within a 100-year floodway as shown on the FIRM panel, all 100-year floodplain fringe areas, and remaining floodplain fringe encroachment areas. Additionally, Policy OSC-1.4 designates as open space all land located within a minimum of 50 feet from the center of perennial and intermittent streams and creeks. Also see response to Comment A-9.

**Response to Comment F-34:** Commenter states that, where possible, all oaks and special-status plant populations be avoided. The majority of impacts to oaks and special-status plants will occur as a result of project-specific activities developed subsequent to the Proposed Project. At the time individual development applications are submitted, the City will assess development proposals for potential impacts to significant biological resources pursuant to CEQA and associated State and Federal regulations (see Master Response #2). Draft 2050 General Plan Policy OSC-5.1 provides protection for oaks and special-status species from future planned projects and reads as follows, "The City shall support the preservation of heritage oaks and threatened or endangered vegetative habitat from destruction."

**Response to Comment F-35:** Commenter states, without explanation, that the Draft EIR inadequately addressed the issue of restoring and maintaining open space areas such as riparian and wetland habitat. In the Draft EIR, Impacts OSC-3, OSC-4, and OSC-5 provide a discussion of potential impacts to riparian and wetland habitats. These impact discussions also provide measures to mitigate impacts to a variety of biological resources, including riparian and wetland habitats (see pages 7-11 through 7-16 of the Draft EIR).

**Response to Comment F-36:** Commenter states that the Draft EIR does not address riparian and in-stream benefits of not detaining 2- to 5-year storm events. There may be potential riparian benefits by not detaining the 2- to 5- year events in the form of more frequent flooding of the incised and lowest over-bank locations on a stream expanding seasonal wetlands into these areas. However, these potential benefits must be balanced against State Water Quality Control Board permitting requirements that do not allow for increases in flows from the 2- to 5 year events. Hydro-modification standards adopted by the State suggest that increases to flow rates in the smaller and more frequent events can be harmful for water quality, causing streams to go out of balance and possibly result in erosion or sedimentation in downstream locations. Please refer above to the responses prepared for Comments F-34 and F-35.

**Response to Comment F-37:** Commenter states that a minimum 100-foot buffer be maintained between the proposed development and any on-site avoided wetlands, floodplains, wildlife areas, and woodlands. As stated in Master Response #2, the purpose of a Program EIR is to address the

broad implications of the Proposed Project. Future planned projects will undergo additional project-level environmental analysis to determine whether buffers are necessary pursuant to the requirements of policies in the Draft 2050 General Plan and other regulatory requirements. Please see Master Response #2 and the responses prepared for Comments A-8 and A-21.

**Response to Comment F-38:** Commenter recommends that the EIR include an analysis of County services in the Public Services section and the potential impacts on those services from implementation of the Draft 2050 General Plan. The cumulative impact analysis considers cumulative impacts to a range of public services and utilities from the Draft 2050 General Plan in conjunction with the General Plans of the cities of Rocklin, Roseville, and Wheatland, the town of Loomis, the counties of Placer and Sutter, and the Placer County Regional Transportation Plan (see pages 11-15 through 11-18). The Draft EIR provides a programmatic assessment of the Proposed Project, which is provided for under CEQA Guideline section 15168(a) and is a first tier analysis that assesses and documents the broad environmental impacts of a program with the understanding that additional detailed site specific environmental review may be required to assess future projects, which will also require more specific mitigation measures to address identified impacts. Also, please refer to Master Response #2.

**Response to Comment F-39:** Commenter states that the Draft EIR should address impacts associated with the County Landfill. Impact PFS-12 and Impact PFS-13 on pages 6-30 through 6-33 of the Draft EIR address impacts to the Western Regional Sanitary Landfill. Additionally, Commenter notes that the Western Placer Waste Management Authority was not on the EIR distribution list. The Western Placer Waste Management Authority commented on the Draft EIR (see Letter O).

**Response to Comment F-40:** Commenter suggests that additional information regarding services provided by the County be clarified and included in the EIR. Placer County Fire Department provides structural fire protection for the areas east of State Highway 65 and is also responsible for both structural and wildland fire protection for those areas west of State Highway 65. Placer County has currently elected to enter into a contract with the California Department of Forestry to provide these services. In addition, Placer County has recently added a new station, Placer County Fire Department Sunset Station 77 at 1300 Athens Road. Staffing at this station includes a 3-person paramedic fire engine with advanced life support and services the Sunset Industrial park and surrounding areas. The City will incorporate this additional environmental setting information into the General Plan Background Report as appropriate.

**Response to Comment F-41:** Commenter would like to know if the City intends to provide fire protection for the unincorporated areas west of the project. The City intends to provide fire protection services within its jurisdictional boundaries. These services will be provided for new areas of the City at the time when those areas are annexed into the City as part of the LAFCO process. Additionally, the City will continue to participate in the mutual aid program for responses outside its jurisdictional boundaries.

**Response to Comment F-42:** Commenter asks whether new development within the City will provide traffic elements designed to assist emergency vehicle response within and through the project boundaries. While the details of specific development projects are not being addressed at this level of analysis (see Master Response #2) the Draft 2050 General Plan provides for policies that are designed to achieve acceptable response times (see Policies PFS-8.2., PFS-8.4, PFS-8.5, PFS-8.6, and HS-9.2) for fire protection services. The policies provide as follows:

- **Policy PFS-8.2 Fire Protection.** The City shall expand fire protection services as needed to meet fire response times. *[Modified Existing Policy 4, Public Services and Facilities Element]*
- **Policy PFS-8.4 Fire Response Times.** The City shall strive to maintain a firefighting capability sufficient to maintain a fire response time of five (5) minutes or less as a general guideline for service provision and locating new fire stations. *[Modified Existing Policy, Public Facilities Element]*
- **Policy PFS-8.5 Provision of Fire Station Facilities and Equipment.** The City shall provide fire station facilities, equipment (engines and other apparatus), and staffing necessary to maintain the City's service standards (ISO rating and response time). *[New Policy]*
- **Policy PFS-8.6 Emergency Access.** The City shall require all new developments to provide adequate emergency access features, including secondary access points. *[Modified Existing Policy, Public Facilities Element]*
- **Policy HC-9.2 Coordinate Emergency Response Services with Local Agencies.** The City shall continue to coordinate emergency response services with Placer County, other cities within Placer County, special districts, service agencies, voluntary organizations, and state and federal agencies. *[New Policy]*

The City considers the proposed policies adequate to address the continued provision of appropriate emergency response service levels and ensure continued interagency coordination with regional service providers. Additionally, at the time that Specific Plans for development proposals are reviewed by the City, such measures as traffic pre-emption and use of traffic calming design will be evaluated.

**Response to Comment F-43:** Commenter states that additional fiscal documentation is needed to address fiscal impacts on the City and fiscal implications to Placer County (County). The fiscal impact analysis conducted for the Proposed Project examines impacts to the City's General Fund and details only major City revenues and expenditures relative to services operating within that funding source, which are primarily property tax and sales tax. This was deemed appropriate given the long timeframe considered in the General Plan Update and that other City funds operate as enterprise funds having a revenue source independent of the General Fund. The fiscal analysis is not designed to provide a precise fiscal impact analysis at this time given that such an analysis would be sensitive to the specific details of a proposed development project and the market conditions present at the time of analysis. Particularly because of the ever-changing nature of

state and local policies on public finance, as well as real estate market conditions, any long-term analysis of the Proposed Project's fiscal impact on the County over the next 50 years would be speculative. The benchmarking approach used for the Proposed Project was deemed an appropriate method of analysis that allows the City the ability to understand the broader implications of land use decisions on the City's General Fund and the resulting ability to provide the desired levels of service which must operate out of the General Fund

Commenter also notes that fiscal impacts are not considered impacts on the environment and that absent an adequate fiscal study, the City should anticipate the use of special assessment and other general purpose revenues other than property taxes. As noted in the Response to Comment F-1 above, the City's General Plan policies require the approval of a Specific Plan in order for any Village or Special Use District to move forward with a development proposal. As subsequent Specific Plans are developed, a detailed fiscal analysis for each Specific Plan will be done at that time. The future development of any of the Villages or Special Use Districts by the City will require the submittal of an annexation application to the County Local Agency Formation Commission (LAFCO) for approval. The LAFCO process requires a fiscal impact analysis to identify specific fiscal issues between the City and County as part of its process. In order to undertake these negotiations, a fiscal impact analysis to identify specific issues between the City and County would be done. At the time of such applications, a more precise and detailed fiscal analysis would be generated based upon the factors present at that time. During these subsequent reviews, a more precise determination would be made of specific proposals and how they may affect the County at that time. As provided under CEQA Guideline section 15168(a), this document is a first tier analysis that assesses and documents the broad environmental impacts of a program with the understanding that additional detailed site specific environmental review may be required to assess future projects, which will also require more specific mitigation measures to address identified impacts. Please see Master Response #2.

**Response to Comment F-44:** Commenter states that additional fiscal analyses should be conducted to address broad fiscal implications of the Draft 2050 General Plan Update, fiscal implications to the City and County of the provision of public services, and the analysis should address any identified shortfalls in funding. Additionally, future project specific fiscal analysis needs to address impacts to the County. Please refer to the response prepared for Comment F-43 and Master Response #2.

**Response to Comment F-45:** Commenter states that the EIR should be supported by a fiscal study that provides a broad overview of fiscal impacts to the City and County. Please refer to the response prepared for Comment F-43.

**Response to Comment F-46:** Commenter states that there is no discussion of the Draft 2050 General Plan impacts to the Sunset Industrial Area. Impact ED-2 states, "The Proposed Project includes community and regional commercial development that may cumulatively impact regional commercial development in areas surrounding the City's Sphere of Influence." Although future industrial development may occur that could impact the Sunset Industrial Area, the timing and details of future development projects are unknown at this time. Analysis of future impacts of development on existing land uses should be considered on a case-by-case

basis. As specific developments are proposed, the City will work cooperatively with the County and other local jurisdictions to determine the impacts of future proposed development.

**Response to Comment F-47:** Commenter recommends that the EIR, including other future EIRs, specifically state that mitigation for peak flow runoff be provided for 2-, 10-, and 100-year storm events. The City's Standard for Detention is also for the 2-year, 10-year and 100-year events. However, exceptions for situations where timing of detention can result in higher peak flows are made. Also see response to Comment F-36.

**Response to Comment F-48:** Commenter states that the Draft 2050 General Plan Update should state that providing stormwater detention mitigation may actually increase peak flow runoff downstream of specific project sites. The City's peak flow events policy (Policy PFS-4.6) requires regional impact analysis where applicable as a standard and takes into consideration the overall effects of proposed detention. That policy provides as follows:

- **Policy PFS-4.6 Preproject Conditions.** The City will require new development to provide storm-water detention sufficient to limit outflow per Figure 7-1 of the City's Stormwater Management Manual (February 1994), or as revised. Master Drainage Plans shall be designed to require new development to provide, or contribute towards, stormwater detention to reduce post-development peak flow from a 100 year event to pre-development flow rate less 10 percent of the difference between the estimated pre-development and the post-development unmitigated peak flow rates. The Master Drainage Plan shall identify appropriate locations to achieve such post-development flows. This criterion is principally designed to address the 100-year flood event with appropriate consideration given for the feasibility of mitigating 2-year and 10-year events. *[Modified Existing Policy, Public Facilities Element]*

As noted in response to Comment F-47, above the City's standards acknowledge that in some situations storm-water detention may increase peak flows.

**Response to Comment F-49:** Commenter inquires as to whether the City's proposed and/or existing regional retention basins provide the necessary mitigation for the entire Planning Area. The drainage analysis for the Draft 2050 General Plan identifies an estimated 1,850 acre feet of volumetric impacts resulting from the expansion areas in addition to the areas within the current sphere and under the existing General Plan. This information is set forth in Appendix H "Drainage and Hydrology Constraints Analysis" (February 2006) found in Volume III of the Draft EIR Appendices. Policy PFS-4.7 sets forth the City's requirements for the retention of storm-water from new development based upon an eight-day 100-year storm. This document is a Program level EIR, which includes a first tier analysis that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site-specific environmental review will be required to assess future projects, which will also require site-specific mitigation measures to address identified impacts. As suggested by Commenter, as subsequent EIRs are developed for the required Specific Plans a detailed analysis of volume runoff and mitigation measures will be presented.

**Response to Comment F-50:** Commenter recommends that 100-year floodplain limits within the Planning Area be based on future, unmitigated peak flow rates. The City maps the floodplains per its floodplain ordinance, which references FEMA criteria. In the past, the City has assumed unmitigated conditions for areas outside the City limits based on planning documents from other agencies, such as an Auburn Ravine analysis developed in the South Lincoln Master Drainage Plan. FEMA's analysis of Markham Ravine is still being used by the City. Coon Creek Hydrology has been developed with the Lakeview Farms project and is based on current levels of development within the watershed.

**Response to Comment F-51:** Commenter states that the URBEMIS air quality emission calculations for construction emission estimates are incomplete; however, Commenter does not indicate why the calculations are incomplete, making it difficult to respond to the alleged inadequacy. Impact HS-4 generally discusses construction activity emissions and also provides discussion of operation-related emissions resulting from implementation of the Proposed Project (refer to pages 8-8 through 8-12). URBEMIS emissions calculations were generated for operation of the Proposed Project based on planned future land uses, which is pursuant to the requirements of a programmatic EIR. Future analysis of construction emissions using URBEMIS will be conducted on a project-by-project basis. Please refer to Master Response #2.

**Response to Comment F-52:** Commenter agrees with the impact analysis in the EIR stating that air quality impacts will be significant and unavoidable and that the Draft 2050 General Plan policies will help to reduce air quality impacts. No specific response is required for this comment.

**Response to Comment F-53:** Commenter recommends that the EIR include as mitigation the recommended site distances referenced in the California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective. This program EIR was developed to address the broad implications of the Proposed Project. Future site-specific projects may be required to analyze air quality impacts in a project-level document.

Additionally, the Draft Goals and Policies Report includes a number of policies designed to incorporate state and federal guidance specific to air quality issues, including the following:

- **Policy HS-3.1 Cooperation with Local and Regional Agencies.** The City shall cooperate with other *local, regional, and State* agencies in developing an effective approach to regional air quality planning management implementing air quality plans that achieve State and Federal Ambient Air Quality Standards. Air quality plans shall incorporate programs developed by the Sacramento Area Council of Governments and the PCAPCD. *[Revised Policy – Draft EIR Analysis]*
- **Policy HS-3.2 Regional Agency Review of Development Proposals.** The City shall solicit and consider comments from local and regional agencies on proposed projects that may affect regional air quality. The City shall submit development proposals to the Placer County Air Pollution Control District for review and comment in compliance with the California Environmental Quality Act (CEQA) prior to consideration by the City. *[New Policy]*

**Response to Comment F-54:** Commenter states that information regarding services provided by the California Department of Forestry should be included in the Draft EIR and that the Draft EIR should mention Placer County Fire Department Sunset Station 77 located at 1300 Athens Road. Please refer to the response prepared for Comment F-40.

**Response to Comment F-55:** Commenter states that PCFD Page Station 75 falls within the Proposed Project boundaries and that the Proposed Project will split Zone 76 into two non-contiguous pieces. Commenter also asks whether the City intends to provide fire protection for the unincorporated areas west of the Proposed Project. Please refer to the response prepared for Comment F-41.

**Response to Comment F-56:** Commenter asks whether traffic elements designed to assist emergency vehicle response within and through the project boundaries be included in the Plan. Please refer to the response prepared for Comment F-42.

**Response to Comment F-57:** Commenter requests a precise location for each proposed land use for purposes of addressing traffic impacts. The City's Draft 2050 General Plan for the new development areas is built around a Village concept and proposes seven Villages. Each Village has been assigned a land use formula, which is set forth on Table 4-5 of the Draft 2050 General Plan found on page 4-39. This table of formulas assigns land uses to each Village in terms of the residential mix between Country Estates at 2 units per acre, Low Density Residential at 4.5 units per acre, Medium Density at 8 units per acre, and High Density Residential at 16 units per acre. In addition, the City's proposed 40% Open Space requirement is applied to each Village. While a precise layout of each land use is not included at this point, the land use formula provides an accurate basis for assessing a variety of impacts from the development of each Village in terms of water, sewer, traffic, drainage, and other public facilities.

The results of the traffic modeling are set forth in Chapter 5 of the Draft EIR, which addresses impacts to both the local and regional transportation system on a roadway basis as well as an intersection analysis. Additional information and details are also provided in Volume II, Appendix E of the Draft Environmental Impact Report. Commenter is referred to these sections for additional information.

**Response to Comment F-58:** Commenter states that the Draft EIR should be expanded to include a reflection of all the regional development and actively interface with the super-cumulative traffic studies. Chapter 5, "Transportation and Circulation," of the Draft EIR provides a discussion and analysis of transportation and circulation impacts that is based on the super-cumulative development scenario for the region's traffic. See also the response to Comment F-18.

### ***Letter G. County of Placer Health and Human Services***

**Response to Comment G-1:** Commenter recommends that certain County and other local agencies be solicited for comments on the Draft EIR for water supply, waste, emergency

response, agricultural, and vector control issues. A copy of the Draft EIR was provided to the appropriate agencies and is also available at the City. See response to Comment G-4.

**Response to Comment G-2:** Commenter requests a copy of a full size land use plan for the Proposed Project be provided. Oversized maps of the Draft Land Use and Circulation Diagram are available at the City of Lincoln Community Development Department (please refer to page iii of the Table of Contents for the Draft EIR).

**Response to Comment G-3:** Commenter notes that it deferred review of the noise chapter of the Draft EIR to the City. No specific response is required.

**Response to Comment G-4:** Commenter requests that the Draft EIR be circulated to California Department of Toxic Substances Control, Central Valley Regional Water Control Board, California Department of Health Services, California Department of Water Resources, and U.S. Air Force contact for adjacent Global Communications Receiver. The Draft EIR was distributed for the required 45-day public review period on October 3, 2006. The Office of Planning and Research (OPR) sent the identified state agencies copies of the Draft EIR (refer to OPR's Document Details Report dated November 17, 2006). The City sent the Draft EIR to the "Regional Environmental Officer for CA-US Air Force McClellan Communications Station" (refer to the Draft EIR's Distribution List behind the cover letter in the Draft EIR). Thus, the City has no reason to believe that the Draft EIR was not circulated to the mentioned entities.

**Response to Comment G-5:** Commenter states that when revisions to Draft 2050 General Plan policies are suggested in the Draft EIR, the policies should also be revised in the Goals and Policies Report. Changes to the Goals and Policies of the Draft 2050 General Plan suggested in the Draft EIR will be made prior to approval of the final Goals and Policies Report.

**Response to Comment G-6:** Commenter suggests that specific criteria be developed for evaluation of all conflicting uses, including public health impacts of conflicting uses, transitions, and buffers. This comment provides examples of specific criteria that might be used for evaluating conflicting uses between agricultural uses and other land uses. These criteria may be considered in the future for projects that will require project-level environmental analysis. Please refer to Master Response #2 and to the responses prepared for Comment A-8 and F-1 for a discussion regarding open space buffers.

**Response to Comment G-7:** Commenter requests that the Draft EIR include a discussion of buffers and continuing effective uses of the adjacent County landfill, the City's sewage treatment plant, and the adjacent U.S. Air Force Global Communications Receiver. Commenter requests a discussion of transitions/buffers and criteria for commercial and other non-residential uses. As previously described in the response to Comments A-8 and F-1, the Draft 2050 General Plan includes a number of policies that support the use of buffers for sensitive land uses. Appropriate buffers and transitions will be determined for future projects during project-level environmental review. At the time of future project-level planning, buffer and transition areas will be required and guided by Draft 2050 General Plan Policies LU-3.6, LU-4.1, PFS-5.8, and OSC-1.3 (see ages 4-16, 6-8, and 7-1). Please refer to Master Responses #1 and #2.

Commenter also requests that the City contact the Western Placer Waste Management Authority and the U.S. Air Force for their input. Please refer to response to comment G-4.

**Response to Comment G-8:** Commenter states that if Policy PFS-2.19 is required to reduce impacts to groundwater supplies to a less-than-significant level, then a definitive method of providing regional groundwater management should be provided. Policy PFS-2.19 provides, "The City shall work in concert with the County of Placer, other cities and local water purveyors to share groundwater data, develop a mutually beneficial Integrated Regional Water Resources Management Program, define the long-term sustainability of the groundwater basin, and work to manage groundwater uses in ways that facilitate the basin's sustainability." Implementation of new Policy PFS-2.19 and the other policies identified on page 6-9 of the DEIR will result in a less than significant impact from the Proposed Project on the long term supply of groundwater or its recharge. The purpose of Policy PFS-2.19 is to identify the City's commitment toward cooperating with neighboring water purveyors in managing the regional groundwater resource. The City alone cannot ensure regional sustainability or the cooperative efforts of other water purveyors in the area.

The Planning Area is located near the eastern boundary of the 351,000-acre North American sub-basin of the Sacramento Valley Groundwater Basin. Groundwater in western Placer County generally flows from the northeast to the southwest direction. Impermeable granite basement rocks deepen in a generally south-southwesterly direction, which helps form the aquifer system beneath the City of Lincoln and its proposed sphere of influence. A 1999 groundwater study by Spectrum-Gasch on behalf of the City of Lincoln estimated the sustainable yield of groundwater from areas underlying the City's sphere of influence at 47,250 AFY. This estimate was generated by first reducing the annual yield by 30% to account for geologic difficulties in the extraction of groundwater.

An earlier study of this same groundwater basin conducted in 1995 by Montgomery-Watson, (North American River Service Area) calculated potential groundwater extraction from below Lincoln's sphere of influence at upwards of 287,800 acre-feet. Due to the nature of the groundwater behavior, absolute knowledge of the entire North American Sub-basin is uncertain. Actual sustainable yields could range from 47,250 AFY to 287,800 AFY across the basin, and a single annual safe yield underneath the City's sphere of influence could be as high as 22,000 AFY under a worse case scenario.

For purposes of its analysis for the Draft 2050 General Plan, the City has determined to use a conservative estimate of the safe annual yields for groundwater at 20,000 acre feet per year underneath the City's sphere of influence. Under the Draft 2050 General Plan, the City has a stated goal of limiting groundwater production to approximately 10% percent of the total annual demand at build-out. With a projected population of approximately 131,000, the estimated annual water demand is about 53,000 AFY. The corresponding groundwater component of this total would be 5,300 AFY.

Based upon this analysis, the City proposes to utilize only 25% of the estimated minimum safe annual yield for groundwater within the City's sphere of influence. As a result of this conservative approach to groundwater utilization, the City's Draft 2050 General Plan will result in a less than significant impact on long term groundwater supplies and groundwater recharge.

As stated above, the purpose of Policy PFS-2.19 is to identify the City's commitment toward cooperating with neighboring water purveyors in managing the regional groundwater resource. The City has already begun to implement this policy by helping establish a cooperative effort among the regional water purveyors of western Placer County. The City of Lincoln, Placer County Water Agency, the County of Placer, and the City of Roseville have developed a memorandum of understanding (MOU) establishing goals and objectives to help manage the groundwater resources of the western Placer County region. With mutual cooperation and sharing of data as described in the MOU, the Western Placer County Groundwater Plan is expected to be completed by 2008. Sharing of groundwater data among the participants would mirror protocols already established and in practice by the adjacent Sacramento Groundwater Authority. Please see Master Response #9 for a further discussion of groundwater supply for the City of Lincoln.

**Response to Comment G-9:** Commenter suggests revising Policy PFS-3.1 to exclude the use of new onsite sewage disposal systems, similar to that discussed for package treatment plants. Policy PFS-3.1 reads as follows:

- **Policy PFS-3.1 Provision of Wastewater Services.** The City shall continue to provide sanitary sewer services and operate public facilities in a manner that does not endanger the public's health, safety, and welfare. The City does not permit the use of package treatment plants to serve individual developments within the City. *[Modified Existing Policy, Public Facilities Element]*

The City's current Municipal regulations, Section 13.08.310, require that existing buildings hook up to the public sewer if a sewer main is located within two hundred feet or less from a building. As a general practice, all new development is required to extend public sewer and water as part of their project approvals. Parcels that are incorporated into the City that have septic and wells are allowed to continue their use unless in the case of sewer, either of the following apply: (a) the septic system is failing; or (b) the system is required to be abandoned as part of the approval of new development on the property. In the case of wells, the City does not have a similar provision to 13.08.310 for water. These systems are typically converted if the landowner experiences problems of water quality or supply, or the parcel is approved for further development once it is annexed into the City.

**Response to Comment G-10:** Commenter recommends consideration of policies relative to the provision of public sewer and water services to unserved properties in the City. This comment requests the addition of a policy regarding the provision of municipal sewer and water service to un-served properties in the City. As indicated in Master Response #1, this comment is noted and will be forwarded to the decision makers for their consideration.

**Response to Comment G-11:** Commenter requests a discussion of water quality impacts to groundwater resulting from older and improperly constructed onsite sewage disposal systems and water wells. Currently in the City, less than 20 parcels of land are on septic and wells within the city limits, which results in a majority of the residences and businesses using municipal sewer and water service. The potential impacts to groundwater resulting from older and improperly constructed onsite sewage disposal systems and water wells, is not considered to be significant within the City. Such older systems are primarily in the surrounding unincorporated areas of the County. As parcels containing these systems are incorporated into the City for development, they would be converted as discussed above. Additionally, please refer to the response prepared for Comment G-9.

**Response to Comment G-12:** Commenter suggests that Sections 6.5 “Solid Waste” and 11.2 “Cumulative Impacts” include discussion of sewage sludge handling, increases, and impacts to disposal. The impact analysis for solid waste was conducted following the standards of significance identified on page 6-29 of the Draft EIR. Impact PFS-12 on pages 6-30 through 6-32 addresses the potential for the Proposed Project to produce enough solid waste to exceed the permitted capacity of the landfill. Operation of the landfill and construction of additional capacity is funded by fees generated by utility customers. As the City’s Draft 2050 General Plan builds out and adds more customers using waste collection services, funding will be available to expand the landfill when needed. The impact analysis does identify the future need for expanded landfill capacity. The landfill was last expanded in January 2004 to handle 25.7 million cubic yards. In spite of the need for the landfill to seek expansion at a future date, the City’s sewage sludge is not currently sent to the landfill on a regular basis. The City’s wastewater treatment operations contracts with a private company to haul the sewage sludge to be used as a soil amendment. The City is currently in the planning stages to develop a new sewage sludge drying facility at the City’s new wastewater treatment plant. This new facility will use a pasteurization and inoculation process to reduce sewage sludge by up to 80%. This process will also enable the sewage sludge to be classified as a Class A Biosolid, which will allow it to be used as a soil amendment in a greater variety of applications.

**Response to Comment G-13:** Commenter suggests that the City consider a policy or setbacks for prudent avoidance of sensitive uses adjacent to existing high voltage power lines. The suggestion is noted. Future planned projects may choose to provide setbacks between residential land uses and high voltage power lines at the time project-level environmental analysis is conducted. Please refer to Master Response #1 and Master Response #2.

**Response to Comment G-14:** Commenter states that the EIR should include a discussion of impacts from the Proposed Project on County services, specifically impacts to environmental health services. The cumulative impact discussion was prepared for the purposes of a program-EIR pursuant to requirements under CEQA Guideline Section 15130 and takes into consideration the current general plan projections for several other local jurisdictions including Placer County and the Placer County Regional Transportation Plan (see pages 11-15 through 11-18 of the Draft EIR). As a Program EIR, this document serves as a first-tier document that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site specific environmental review would be required to assess future projects

implemented under the program (please refer to Master Response #2). In terms of fiscal impacts to County services resulting from population growth, development within the Villages or the Special Use Districts will require the approval of a Specific Plan and annexation to the City. Project-level analyses of potential environmental impacts would occur during the review of the specific plans. In terms of the fiscal analysis for subsequent projects, an evaluation of effects to County services would also be done for purposes of reaching a property tax sharing agreement with the County. Without the details of a subsequent Specific Plan, such an analysis at this time would be speculative. Also see response to Comment F-43.

**Response to Comment G-15:** Commenter states that Policy PFS-5.9 proposed as mitigation in the Draft EIR is redundant to State law and regulation in effect and enforced by Placer County Environmental Health Services in its CUPA program. Policy PFS-5.9 identified as mitigation in the Draft EIR will be modified as follows pursuant to the concerns raised by Commenter:

- **Policy PFS-5.9 Recycling of Hazardous Materials.** The City shall ~~require~~ coordinate with the Placer County Certified Unified Program Agency (CUPA) and support the proper disposal and recycling of hazardous materials. *[New Policy – Revised Final EIR]*

**Response to Comment G-16:** Commenter suggests the City consult with the Placer Mosquito Abatement District about adding a discussion of mosquito vector impacts and mitigation measures. In order to address any potential coordination issues that may arise between the City and the Placer Mosquito Abatement District, the City will include the District in the distribution of its future environmental documents. In addition, Policy PFS-1.1, "Maintain Adequate Public Services," demonstrates the City's commitment to ensuring that adequate levels of public services continue to be provided to existing areas of the City and to ensure that new development will be served by a full range of public services:

- **Policy PFS-1.1 Maintain Adequate Public Services.** The city shall ensure the provision of adequate public services and facilities to the existing areas of the city and to ensure that new development is served by a full range of public services. *[Modified Existing Policy 1, Public Services and Facilities Element]*

**Response to Comment G-17:** Commenter suggests adding a discussion of persistent chemical and fuel contaminants used by commercial agriculture. The purpose of a Program EIR is to address broad implications of development of the Draft 2050 General Plan. Future projects will undergo project-level environmental review, which will evaluate impacts specific to the site. Please refer to Master Response #2 and response to Comment G-18.

**Response to Comment G-18:** Commenter suggests revising Policy HS-5.13 “Hazardous Materials Studies” in order to provide a correct version of the process needed to evaluate conditions of health concern during environmental review. In response, the following revisions to mitigation Policy HS-5-13 shown on pages ES-62, 8-21, 8-22, and 8-24 of the Draft EIR will be incorporated into the Draft EIR (see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR”):

- **Policy HS-5.13 Hazardous Materials Studies.** The City shall ensure that the proponents of development projects (including new, redevelopment, remodel, or demolition projects)

address existing hazardous materials concerns through the preparation of Phase I and, or Phase II hazardous materials studies for each identified site as part of the design phase for each project. Particular attention should be paid to land that contained past agricultural uses. Recommendations outlined in the studies will be implemented as part of the construction phase for each project. *[New Policy – Revised Final EIR]*

**Response to Comment G-19:** Commenter suggests further revision of Policy HS-5.13 to say that these studies may be required for remodel or demolition projects. Please refer to modified Policy HS-5.13 above.

**Response to Comment G-20:** Commenter suggests revising the discussion under Impacts HS-10 on page 8-23 of the Draft EIR to include a discussion of the Certified Unified Program Agency (CUPA) as the primary regulatory agency for hazardous materials. Page 8-27 of the Background Report's Regulatory Setting describes the County Environmental Health Division's role as CUPA and its programs and activities. In January of 1996, Cal/EPA adopted regulations implementing a "Unified Hazardous Waste and Hazardous Materials Management Regulatory Program" (Unified Program). The program is implemented at the local level by a local agency – the Certified Unified Program Agency (CUPA). The intent of the jurisdictional CUPA program is to consolidate and make consistent the reporting requirements, permit format, inspection criteria, enforcement standards and fees for the following six hazardous materials programs: Hazardous Waste Generator and Onsite Hazardous Waste Treatment, Aboveground Storage Tanks – Spill Prevention Control and Countermeasure Plan (SPCC), Underground Storage Tanks, Hazardous Material Release Response Plans and Inventories, California Accidental Release Prevention Program, and Uniform Fire Code Hazardous Material Plans and Inventories. The Placer County Division of Environmental Health Services (EHS) has been approved by Cal/EPA as the CUPA for Placer County. EHS administers the six hazardous materials program. EHS also administers the Underground Storage Tank program in Placer County by performing regular inspections of existing facilities, granting permits for new facilities, checking construction plans, performing site mitigation, and necessary enforcement actions. The California Health and Safety Code provides minimum Statewide standards and regulations for the management of hazardous wastes to protect against potential hazards to public health or the environment.

**Response to Comment G-21:** Commenter requests that all Draft EIR references (pages 8-18, 8-20, and 8-23) to Placer County Environmental Health Department be changed to Placer County Environmental Health Division. These changes will be included in Chapter 6, "Changes and Edits to the Draft and Recirculated Draft EIR."

**Response to Comment G-22:** Commenter states that Policy HS-5.11 on page 8-20 is outdated and that it should be revised to ensure compliance with the Hazardous Waste Management Plan or equivalent documents. The language will be revised to read as follows:

- **Policy HS-5.11 County Hazardous Waste Management Plan.** The City shall review all proposed development projects that involve the manufacturing, use, or transporting of hazardous materials to ensure compliance with the County Hazardous Waste Management Plan or other equivalent guidance. *[New Policy – Revised Final EIR]*

**Response to Comment G-23:** Commenter states that the discussion under Impact HS-9 should include information about the CUPA enforcement program and other program areas. See response to Comment G-20. Commenter is also directed to pages 8-27 and 8-28 of the General Plan Background Report for existing environmental setting information that includes a discussion of the CUPA for Placer County and the Planning Area. The discussion under Impact HS-9 identifies various policies (including Policy HS-5.11) that reference the CUPA enforcement program.

**Response to Comment G-24:** Commenter suggests revising Policies HS-5.12 and HS-5.13 to avoid redundancy. Please refer to response to Comment G-18. Policy HS-5.12 – Hazardous Materials Inventory will be redrafted to read as follows:

- **Policy HS-5.12 Hazardous Materials Inventory.** The City may require, as a component of the environmental review process, a hazardous materials inventory for the site, including an assessment of materials inventory for the site, including an assessment of materials and operations for any applications for land use entitlements. ~~Particular attention should be paid to land that contained past agricultural uses.~~ *[New Policy – Revised Final EIR]*

**Response to Comment G-25:** Commenter suggests revising the parties responsible for implementing Policies HS-5.8 and HS-5.9 (see Table 8-2 in the Goals and Policies Report) from the Environmental Health Department to the City of Lincoln. The Implementation Table 8-2, Measure 4.0 will be revised to reflect that the “Public Works Department” will be responsible for implementing Policies HS-5.8 and HS-5.9.

**Response to Comment G-26:** Commenter requests that the City consult with and obtain County OES comments on emergency response plans. Such plans are routinely coordinated with the County of Placer Operational Area Office of Emergency Services. Plans once adopted by the City are an extension of the Placer County Operational Area and California Emergency Plans. The City’s current Emergency Plan was initially adopted in April 2004.

### ***Letter H. County of Placer Rural Lincoln Municipal Advisory Council***

**Response to Comment H-1:** Commenter requests a change in the proposed boundaries. The comment is noted and will be forwarded to the decision-makers for their consideration. The proposed boundaries for the Draft 2050 General Plan were the result of a series of public workshops, during which the appropriate population size and boundaries for the City was considered, the existing constraints and opportunities for the extension of public services, as well as the interest to coordinate efforts with the Placer County Conservation Plan. All of these factors resulted in the present boundaries being proposed by the Steering Committee. Please refer to Master Response #1.

**Response to Comment H-2:** Commenter would like to know if projected park lands are adequate for the proposed population. Impact OSC-2 on page 7-33 of the Draft EIR identifies that implementation of the Proposed Project would increase the overall demand on park facilities. However, the impact analysis identifies Draft 2050 General Plan policies that will require the

development of new park facilities and recreation programs. Draft 2050 General Plan Policy OSC-7.1 sets forth the amount of land that development projects are required to provide in terms of land area, while Policy OSC-7.17 requires new development to provide the funding necessary for the construction of new park facilities. In addition, Policy OSC-7.18 calls for the City to strive to have newly dedicated, mini and neighborhood parks constructed by developers in conjunction with their project so that residents may have quicker access to park facilities.

**Response to Comment H-3:** Commenter suggests that agricultural issues be revisited and deemed as a limitation to urban growth. In evaluating the boundaries for the Draft 2050 General Plan update, the City took several factors into consideration. The regional growth projections for the Sacramento metropolitan area anticipate that Placer County will need to accommodate approximately 158,000 new dwelling units and some 269,000 new jobs by the year 2050. In evaluating what would be an appropriate level of the projected growth to be accommodated, the City also had to consider the various constraints that would affect the location of new development. One of the key factors was the overflight zones of the Lincoln Regional Airport that restricts urban residential development from being built within certain zones. The over-flight zones encompass nearly 10 square miles, requiring the City to avoid potential land use conflicts. Other constraint factors such as residential buffers from the Western Regional Landfill also affected the placement of land uses. The Draft 2050 General Plan reflects a balance of planning for a reasonable level of Placer County's projected growth and the various land use constraints that affect the layout of urbanization. Please refer to Master Response #1.

**Response to Comment H-4:** Commenter inquires as to how the City can integrate agriculture and be a good neighbor to agricultural activities. The Draft 2050 General Plan policies are designed to establish buffers (see Policies LU-5.4 and OSC-2.1) in those situations in which urban development would permanently interface with agricultural activities. This is anticipated to be the case along the perimeter of the City's proposed boundaries. During the development of specific plans for each of the Villages, detailed information will be gathered relative to the nature of the agricultural activities and designs put forth to establish permanent buffers with the urban landscape. In cases where parcels of land are in the City's Sphere of Influence and agricultural activities are adjoining areas recently annexed and developed, the City would look to implement its policies (LU-5.5 and OSC-2.2) regarding the disclosure of operations and the County's right to farm ordinance. Also, please refer to the response prepared for Comment F-1.

**Response to Comment H-5:** Commenter states that highways and roadways, including the proposed Highway 65 Bypass, are currently unable to handle present traffic. Commenter is referred to Chapter 5 of the Draft EIR beginning at page 5-1, which provides an analysis of the traffic impacts associated with the Proposed Project. The analysis indicates that with proposed mitigation, the City's local street system will operate at acceptable levels of service. Roadways outside the City's jurisdiction will also be impacted and require regional cooperation to mitigate to an acceptable level of service. The Draft 2050 General Plan includes a proposed policy measure for the City to participate in paying the City's fair share of improvements to mitigate such conditions. Traffic and circulation impacts resulting from implementation of the Draft 2050 General Plan are provided in Chapter 5 of the Draft EIR.

**Response to Comment H-6:** Commenter states that years ago the City did not take advantage of property owners' offer to sell land to the City to expand Airport Boulevard to Wise Road. Commenter also states that access to the airport has become very difficult. The reference to Airport Boulevard appears to refer to Airport Road, which currently does not extend from Nicolaus Road to Wise Road along the west side of the Lincoln Regional Airport. While right-of-way has been dedicated for this purpose, roadway improvements have not been made to make this connection. The Proposed Project's Land Use and Circulation Diagram illustrates the various roadway improvements that would be required as the plan is developed. This would include extensions of both Airport Road and Aviation Blvd north to Wise Road for improved circulation; see Figure 5-6 of the Draft EIR.

**Response to Comment H-7:** Commenter would like to know if PG&E is able to supply power for expected growth under the Proposed Project. Impact PFS-14 on pages 6-34 through 6-35 of the Draft EIR discusses potential impacts to utilities. This analysis determines that future development under the Proposed Project will be served with adequate supplies of electricity and gas services. This impact discussion also identifies policies of the Draft 2050 General Plan (PFS-6.1, PFS-6.2, OSC-3.1, OSC-3.2, OSC-3.3, and OSC-3.4) designed to conserve existing energy supplies and ensure the continued provision of public utilities.

**Response to Comment H-8:** Commenter is concerned as to how stores and service providers will be encouraged to open businesses in the village concept. Chapter 3, Economic Development of the Draft 2050 General Plan (Goals and Policies Report), dated October 2005, outlines several policies directed at attracting and retaining new businesses in the City. Specifically, Goal ED-4 (page 3-3) aims to "retain existing business and attract new businesses to provide jobs for current and future residents." The policies established under this goal (Policies ED-4.1 through 4.6) provide for the increase in activities of existing businesses, identification of target business and industries, attraction of new businesses, and encouragement and promotion of a strong retail market in the City. These policies would apply citywide as well as to targeted commercial opportunities in individual villages. Villages are also designed to be of sufficient size and population that commercial areas planned into them will have an adequate market making it attractive for various retailers and providers of personnel services to locate within these areas. These concepts will be further refined during the Specific Plan process for each Village.

Implementation Measures 7.0, 9.0, and 10.0, outlined in the Goals and Policies Report on page 3-6, suggest specific strategies and timeframes by which these economic development policies shall be implemented.

**Response to Comment H-9:** Commenter would like to know if dwelling units are planned in floodplain zones. Impact PFS-11 on pages 6-26 through 6-28 of the Draft EIR states that after a review of the applicable FEMA maps, the portions of the Study Area along Auburn Ravine, Markham Ravine, and Coon Creek are within the 100-year floodplain. The impact analysis identifies Draft 2050 General Plan Policies HS-6.1, HS-6.2, HS-6.3, HS-6.4, and HS-6.5, which provide as follows:

- **Policy HS-6.1 Flood Protection.** The City shall ensure that adequate flood protection is provided throughout the community. *[New]*

- **Policy HS-6.2 Drainage and Flood Control Facilities.** The City will continue to cooperate and coordinate efforts with the Placer County Flood Control and Water Conservation District for the construction, operation, and maintenance of drainage and flood control facilities and where feasible provide for their joint use. This includes cooperation with Placer County, cities within Placer County, and Sutter County and special districts to provide regional flood control protection. *[Modified Existing Policy 2, Community Safety Element]*
- **Policy HS-6.3 Master Drainage Plans.** The City shall require master drainage plans as a condition of approval for large development projects. *[Existing Policy 3, Community Safety Element]*
- **Policy HS-6.4 New Residential Construction.** The City shall require new residential construction to have its lowest habitable floor elevated above the base flood level elevation. *[Existing Policy 5, Community Safety Element]*
- **Policy HS-6.5 Stream Channels.** The City shall prohibit development along stream channels that would reduce the stream capacity, increase erosion, or cause deterioration of the channel. *[Existing Policy 6, Community Safety Element]*

### **Letter I. County of Placer Sheridan Municipal Advisory Council**

**Response to Comment I-1:** Commenter expresses an opinion that the proposed Sphere of Influence is too close to the town of Sheridan. Please see the response prepared for Comment H-land refer to Master Response #1.

**Response to Comment I-2:** Commenter is concerned that the proposed population figures would result in intolerable traffic on both major and rural roads in the area. Traffic and circulation impacts resulting from implementation of the Draft 2050 General Plan and mitigation measures are provided in Chapter 5 of the Draft EIR. Also see the response prepared for Comment H-5.

**Response to Comment I-3:** Commenter notes a concern regarding possible depletion of groundwater. According to the City's records, tests, estimates, and neighboring water purveyors, groundwater depletion is not occurring within the Lincoln area. As referenced in the DEIR, the City's *Groundwater Management Plan and Urban Water Management Plan of 2003* indicate the City's groundwater levels have been stable since the 1920's, and that the City will be able to continue to develop groundwater as a resource to meet backup, emergency, and peak demands without adversely affecting other groundwater uses.

An example of the City's on-going efforts regarding its concern for the groundwater conditions in the area is the preparation of the Western Placer County Groundwater Management Plan (WPCGMP). The WPCGMP has been under development since 2005, with an agreement to be entered into by and between the City of Lincoln, the City of Roseville, the County of Placer, and Placer County Water Agency. As excerpted from a recent presentation,

“The goal of the Western Placer County Groundwater Management Plan (WPCGMP) is to maintain the quality and ensure the long term availability of groundwater to meet backup,

emergency, and peak demands without adversely affecting other groundwater uses within the WPCGMP area.”

The limits of the WPCGMP study include the northerly boundaries of PCWA Zone 5 – Bear Creek area. Also see Master Response #9.

**Response to Comment I-4:** Commenter is concerned about a decrease of land on the west-side of Dowd Road. The proposed boundaries for the Draft 2050 General Plan were the result of a series of public workshops, during which the appropriate population size and boundaries for the City was considered. The existing constraints and opportunities for the extension of public services as well as the interest to coordinate efforts with the Placer County Conservation Plan were also considered. All of these factors resulted in the present boundaries being proposed by the Steering Committee. Please refer to Master Response #1.

**Response to Comment I-5:** Commenter prefers Alternative #4 limiting population growth to approximately 106,000 on 22,130 acres with 42,130 dwelling units. This comment does not require a specific response.

### ***Letter J. Placer County Local Agency Formation Commission***

**Response to Comment J-1:** Commenter notes that the EIR appears to address its primary concerns regarding the efficient delivery of governmental services. No specific response is required.

**Response to Comment J-2:** Commenter states that while the EIR addresses key policy concerns identifying significant impacts to agricultural resources, Commenter asks for an analysis of LAFCO policies concerning Preservation of Agricultural Land and Open Space Resources. That policy provides that as a general matter, annexation of farmlands is not permitted when significant areas of non-productive farmland are available. The Draft 2050 General Plan is a long-range planning document that tries to balance the long-range growth projection for the Sacramento region and the goals and objectives of the City of Lincoln. See Master Response #8. The Draft 2050 General Plan proposes to protect existing agricultural operations. Policy LU-5.3, “Protect Agriculture,” is identified as a mitigating measure of the Draft 2050 General Plan that will ensure continued operation of agricultural land uses is not prematurely terminated and provides, “The City shall ensure that agricultural land uses are not prematurely terminated by protecting the continued operation of agricultural land uses.” As noted in Master Response #2, as specific development proposals are submitted to the City that require the annexation of land to the City, a review of the LAFCO policy will be conducted in the context of a specific application.

**Response to Comment J-3:** Commenter states that the Draft EIR discuss and analyze the impacts of meeting the criteria for sphere of influence land subject to the Williamson Act. Impact LU-5 on pages 4-25 and 4-26 of the Draft EIR analyzes conflicts between the Proposed Project and existing Williamson Act contracts. Although the analysis states that there may be conflicts with Williamson Act contracts, proper procedures contained within the Williamson Act will be followed as development occurs under the Sphere of Influence. Additionally, this impact identifies policies, which encourage orderly development and discourage the premature

conversion of agricultural lands (see Policies LU-5.4, LU-9.6, and OSC-2.1). Policy LU-5.3 requires the long-term protection of existing lands under a Williamson Act contract. Section 56426.5(b) of the Government Code allows LAFCOs to approve a change to a sphere of influence for lands subject to a Williamson Act contract if the change would facilitate planned, orderly, and efficient patterns of land use or provision of services, and the public interest in the change substantially outweighs the public interest in the current continuation of the contract beyond its current expiration date. Additionally, that change must not be likely to adversely affect the continuation of the contract beyond its current expiration date. The Draft 2050 General Plan addresses a 2050 Blueprint planning effort, which involves a 50 year timeframe and the proposed Placer County Conservation Plan, which is also a 50 year program once it is adopted and implemented. The SACOG Blueprint effort has developed long range projections for Placer County as well as the greater Sacramento Metropolitan area in an effort to better plan for growth within the region and to better utilize available transportation resources. Placer County is anticipated to have a need for an additional 158,000 dwelling units by the end of this 50-year period. In addition, the proposed Placer County Conservation Plan will in effect establish the limits of urban development within the southwestern portion of the County.

The Draft 2050 General Plan proposes to coordinate its growth and development within the 2050 timeframe and to provide for an orderly and efficient pattern of development and services. The Draft General Plan would accommodate approximately 22% of the County's projected 158,000 dwelling unit growth during this time frame. This has necessitated that the City undertake a long range and orderly plan for its Sphere of Influence that includes parcels that are presently under the Williamson Act.

As more fully described above and in the response to Comment J-1, the Draft 2050 General Plan includes policies that promote planned, orderly, and efficient patterns of land uses and services. In order for the City to meet its fiscal and economic objectives and operate within the context of the proposed PCCP and SACOG Blueprint plan, the City needed to evaluate its Draft 2050 General Plan within the context of a 2050 time frame. It is possible that the proposed change in the sphere of influence could affect the continuation of Williamson Act contracts beyond their current expiration date. However, given the factors regarding the projected growth within Placer County, the desire to establish the Placer County Conservation Plan and the City's objectives for fiscal and economic stability such a change could outweigh the need to continue current contracts beyond their expiration date.

**Response to Comment J-4:** Commenter requests that the Draft EIR address LAFCO policies relating to Logical Patterns of Growth and Discouraging Urban Sprawl. The Draft EIR discusses growth patterns and urban sprawl. Impact LU-1 on pages 4-18 through 4-20 of the Draft EIR addresses the intent of the Draft 2050 General Plan to ensure that future growth will occur in an orderly pattern consistent with the economic, social, and environmental needs of the City. This will enable future land use planning decisions to balance development of needed infrastructure within existing and proposed community areas so that community continuity is maintained within these areas. This impact identifies Policy ED-2.1 as a requirement that the City use a defined planning process for future growth areas that could allow the City to plan for long-term infrastructure needs in coordination with future urban development. Policy ED-2.1 provides:

- **Policy ED-2.1 Utilize Specific Plans.** The city shall utilize the specific planning process for future growth areas, which will allow the City to plan for long-term infrastructure needs and create large tracts of land that are attractive to developers. *[New Policy]*

Infill development is also encouraged within the City under Policy LU-1.9, which provides:

- **Policy LU-1.9 Existing Assets.** The City will promote the use of vacant infill parcels and the intensifying of land uses on parcels that are underutilized in order to better utilize existing public infrastructure. In conjunction with this effort the City will support the reuse and refurbishing of existing structures within the historic downtown. *[New Policy]*

Additionally, the Commenter is referred to Master Response #8.

***Letter K. Placer County Transportation Planning Agency (letter dated November 15, 2006)***

**Response to Comment K-1:** Commenter indicates that there is no description on how PCTPA may use the Draft EIR. Identification of the PCTPA and other agencies use of the EIR on page 2-19 is not intended to provide an all-inclusive description of agencies that will use the EIR. As mentioned by Commenter, Placer County Transportation Planning Agency is an agency that could use the EIR. Commenter also requests consideration of including the 2027 Placer County Regional Transportation Plan in the DEIR or the Bibliography of the DEIR. The traffic analysis conducted by DKS is consistent with the Placer County Regional Transportation Plan. The analysis is based upon the Placer County Travel Demand Model developed in 1993 by DKS and was updated and revalidated on several occasions. The model also utilized the capital improvement programs of the jurisdictions analyzed to determine the short and long range transportation improvements.

**Response to Comment K-2:** Commenter suggests modifying several goals and policies from the Transportation and Circulation Element of the Draft 2050 General Plan. Please refer to Master Response #1.

**Response to Comment K-3:** Commenter provides background information regarding activities of the Placer County Transportation Planning Agency. No specific response is necessary.

**Response to Comment K-4:** Commenter discusses the relationship of the Proposed Project with the Placer Parkway Corridor Preservation Plan and potential transportation funding programs. No specific response is necessary.

***Letter L. Placer County Transportation Planning Agency (letter dated November 16, 2006)***

**Response to Comment L-1:** Commenter states that a Placer County Airport Land Use Compatibility Plan (ALUCP) consistency determination is required before the City Council takes action on the Proposed Project. Such a consistency determination was made on May 7, 2007 (see Comment Letter AAAA).

**Response to Comment L-2:** Commenter states that a Placer County Airport Land Use Compatibility Plan (ALUCP) consistency determination is required before the City Council can take action on the Proposed Project. The Draft 2050 General Plan was submitted to the Placer County Airport Land Use Commission (ALUC) and on March 7, 2007, the ALUC determined that the Draft 2050 General Plan Update, subject to a set of conditions, is consistent with the Airport Land Use Compatibility Plan. See Comment Letter AAAA.

**Response to Comment L-3:** Commenter corrects the key issue summary of its NOP comment letter on page 1-6 of the DEIR. Table 1-1 on page 1-6 will be revised as suggested by Commenter. Please refer to Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment L-4:** Commenter suggests adding two documents to the Bibliography of the Draft EIR, the 2000 Placer County Airport Land Use Compatibility Plan (ALUCP) and the 2002 California airport Land Use Planning Handbook. The Draft EIR considered the Placer County Airport Land Use Compatibility Plan in its analysis of the Proposed Project; please refer to pages 8-24 and 8-25. The evaluation of the Proposed Project determined that the proposed policies were consistent with the ALUCP as well as applicable FAA regulations. While the California Airport Land Use Planning Handbook is a useful document in terms of general planning criteria, the relevant document for purposes of the Draft EIR analysis was the Placer County Airport Land Use Compatibility Plan.

**Response to Comment L-5:** Commenter provides additional information to be included under the Draft EIR’s description of the Placer County Airport Land Use Commission’s role (shown on page 8-43). This change will be made in the Draft EIR. See Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR”.

**Response to Comment L-6:** Commenter provides several suggested corrections to terminology used in the Draft EIR. The suggested terminology changes on pages 1-15, 4-13, 8-44, and 10-58 will be made. Please see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment L-7:** The comment notes that the issue of compatibility with the Airport Land Use Compatibility Plan will be based upon the Draft 2050 General Plan and not the Environmental Impact Report. As stated in response to Comment L-1, a consistency determination was made in May 2007. See response to Comment Letter AAAA.

**Response to Comment L-8:** Commenter requests CD copies of the Draft 2050 General Plan Update. Copies of the Draft 2050 General Plan Update and Draft EIR were provided to the Placer County Transportation Planning Agency as part of the original distribution of documents. Additional copies will be provided as requested.

**Response to Comment L-9:** Commenter suggests a meeting with PCTPA staff to undertake a preliminary Airport Land Use Compatibility Plan review. A meeting was conducted with PCTPA staff as part of the City’s submittal of its Draft 2050 General Plan to the Placer County Airport Land Use Commission for a consistency finding. Also please see response to Comment L-2.

**Letter M. Placer County Water Agency**

**Response to Comment M-1:** Commenter states that the Draft EIR adequately addresses the City's proposed water supply for its Draft 2050 General Plan Update. Please see Master Response #9 for additional discussion of water supply issues.

**Letter N. Western Placer Unified School District**

**Response to Comment N-1:** Commenter provides background information regarding the Western Placer Unified School District's (WPUSD) efforts to update its Facilities Master Plan. Commenter also provided several appendices including projected student population for the district. The Proposed Project has utilized a minimum 15% land area factor to account for the various public land requirements within the Villages. The projected population and estimate of dwelling units for the Proposed Project have taken into account the land area needs for future schools. In addition, as Specific Plans are proposed for each of the Villages, land area requirements for such public facilities will be further refined based upon more detailed information. Regarding the WPUSD's request for the inclusion of additional school sites and 2006 cost information into the Draft 2050 General Plan, please refer to Master Response #7.

**Response to Comment N-2:** Commenter recommends that the EIR reflect the need for designating 430 acres of land for schools in the Village and Special Use District areas. The WPUSD asks that Table 2-3 in the Draft EIR be amended to reflect this need under the "Public" heading of the table. Table 2-3's listing of Public was not intended to include land acreage required for future school sites under the Draft 2050 General Plan. This acreage is accounted for in the initial reduction of land available for development calculation, which is discussed on page 2-17 of the Draft EIR. Additionally, each specific plan for the Villages and Special Use District areas will identify the specific location and type of land uses, detailed locations for schools, street alignments, and the necessary infrastructure, and the financial funding for these improvements. Each specific plan will be analyzed pursuant to CEQA. Please refer to Master Response #2 and Master Response #7.

**Response to Comment N-3:** Commenter states that additional work will be necessary to plan the public facilities needed in each Village. Commenter states its willingness to work with the City and the development community to locate school sites and strive to have schools built in a timely manner. No specific response is necessary.

**Response to Comment N-4:** Commenter notes that the WPUSD will work with the City during the initial planning stages of each Village area regarding the number and placement of future school sites. No specific response is necessary.

**Response to Comment N-5:** Commenter notes that given the projected growth in the Proposed General Plan, the WPUSD may become the largest school district in Placer County. No specific response is necessary.

**Response to Comment N-6:** Commenter notes the past cooperative working relationship between the City and WPUSD. To facilitate this joint planning effort, Commenter provides

additional information regarding the projected number of students and school facilities that would be required under the Draft 2050 General Plan. No specific response is necessary.

**Response to Comment N-7:** Commenter agrees with the intent of Policy PFS-9.9. No specific response is necessary.

**Response to Comment N-8:** Commenter suggests various strategies that could result in cost reductions for new joint use facilities between the City and the WPUSD. Please refer to Master Response #1. The information is noted. No specific response is necessary.

**Response to Comment N-9:** Commenter notes that cost savings can be obtained by jointly planning future school sites and parks. The Draft 2050 General Plan does contain policy PFS-9.8, which provides, "The City shall coordinate with the Western Placer Unified School District to encourage the joint siting of schools with parks and community centers." This policy supports the collocation of school and recreational facilities. No further response is necessary.

**Response to Comment N-10:** Commenter notes that a land costs savings for future school sites could be realized if sites are identified early on in the City's planning process. No specific response is necessary.

**Response to Comment N-11:** Commenter notes that during the construction of major infrastructure within Villages, having developers install such improvements to future school and park sites would result in a cost savings to the City and WPUSD. As a general practice, the installation of basic infrastructure to future school and park sites occurs at the same time improvements are installed for purposes of project development.

**Response to Comment N-12:** Commenter suggests ways to reduce costs and requests that specific school and park sites be established during the review of the Draft General Plan. The level of analysis that would be necessary in terms of specific constraints, wetlands permitting, land use plans, and infrastructure layouts to identify and site specific school and park sites within each Village makes this impractical at this stage. The specifics of such land use decisions will occur during the development of a specific plan for each of the Villages and Special Use Districts. During the development of each specific plan, the school district will be asked to be involved in locating new school sites. As part of the specific plan process, an environmental analysis will be conducted that accounts for the development of new schools and parks. Please refer to Master Response #2.

**Response to Comment N-13:** Commenter notes that a variety of funding mechanisms will need to be considered in order to construct new facilities in a timely manner. Commenter notes the WPUSD's openness to consider developer-built schools under State laws that allow for such an approach. Please refer to Master Response #1.

**Response to Comment N-14:** Commenter summarizes earlier comments within this letter and also expresses it looks forward to working with the City in the future. For additional information, please refer to the responses prepared for Comments N-1 through N-14.

**Letter O. Western Placer Waste Management Authority**

**Response to Comment O-1:** Commenter noted several references within the setting section of Chapter 6, Section 6.5 “Solid Waste” that need to be corrected. These changes will be made in the Draft EIR. See Chapter 6 “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment O-2:** Commenter states that the Draft EIR should estimate the amount of solid waste generated during construction as well as after project completion, as well as determine if the increase in waste will significantly shorten the lifespan of the Western Regional Sanitary Landfill (WRSL) and/or affect the waste handling ability of local facilities. Given the programmatic nature of the Draft EIR, an estimate of the entire amount of construction debris expected to occur as a result of development proposed under the Draft 2050 General Plan by 2050 is considered highly speculative. As more fully described, in Master Response #2, future development projects may be required to undergo further project-specific environmental analysis to determine the range of project-specific impacts including the generation of construction waste.

**Response to Comment O-3:** Commenter states that the Draft EIR should address the Proposed Project’s impacts on the Western Placer Waste Management Authority (WPWMA) facilities and the potential need for new or expanded facilities. Commenter also suggests that the EIR develop appropriate mitigation measures to minimize these impacts in addition to the mitigation measures provided in the comment. Impacts to solid waste services and facilities are addressed in Impact PFS-12 on pages 6-30 through 6-32. The analysis identifies the City’s capital facilities fee program in the existing Public Facilities Element that requires all new development to fund needed facilities and equipment, which includes solid waste facilities and equipment. This impact discussion identifies several policies in the Draft 2050 General Plan that will help to minimize impacts to the landfill and the provision of solid waste services, including Policy PFS-5.7, which requires the City to cooperate with WRLA in preparing and implementing landfill expansion plans. Please refer to Master Response #2.

**Response to Comment O-4:** Commenter states that the Draft EIR should address potential impacts on WPWMA facilities, such as an increase in traffic on Athens Avenue and Fiddymment Road could impede traffic flow entering and exiting WPWMA facilities; and an increase in customer traffic within the facility could potentially exceed design limits. Commenter also states that the DEIR should identify appropriate mitigation measures. Traffic volumes and traffic impacts on Fiddymment Road and at the Athens Road/Fiddymment Road intersection would be reduced substantially with Mitigation Measure TC-10. This measure was called the Mitigated Transportation Network and includes the extension of Dowd Road from Athens Road to the future University Boulevard and the widening of Fiddymment Road to six lanes from Athens Road to the future Placer Parkway.

Under Cumulative No Project Conditions, the Athens Road/Fiddymment Road intersection would operate at LOS F conditions. Under Cumulative Plus Project with the Mitigated Transportation Network, this intersection would be improved to LOS D conditions. With or without the City’s

Draft General Plan, traffic control measures will be needed at the entrances to WPWMA facilities, including traffic signalization.

Commenter notes that with an increase in traffic around the Western Placer Waste Management Authority facilities, there is a potential for increased litter in the vicinity. The comment is not clear in regards to the source of the additional litter being from an additional flow of vehicles entering the WPWMA facilities or from vehicles passing by the facilities. In terms of the City's solid waste vehicles that transport waste to WPWMA facilities, the City requires that such vehicles are covered in order to reduce the potential for litter along the travel ways to the landfill. In terms of measures to reduce litter from vehicles passing through the area, there are no practical measures available beyond the posting of roadways alerting the occupants of vehicles that littering is an offense subject to fines.

**Response to Comment O-5:** Commenter states that the Draft EIR should clarify that land use designations will be compatible with and reflect buffer requirements of both the existing landfill and the expansion property. The "Special Use District – C" section on page 4-16 of the Draft EIR addresses the need for a 1-mile buffer between the existing and future landfill site and residential land uses. Proposed land uses in this area include open space and industrial. Impact LU-1 identifies Draft 2050 General Plan Policies LU-2.1, LU-2.7, and LU-3.5 are designed to promote compatible development within areas that minimize impacts to surrounding land uses (see page 4-20 of the Draft EIR). Those policies provide:

- **Policy LU-2.1 Prevent Incompatible Uses.** The City shall prevent the intrusion of new incompatible land uses into existing residential areas. *[Existing Land Use Element Policy 4.1]*
- **Policy LU-2.7 Compatible Uses.** The City shall work with neighboring jurisdictions in planning contiguous areas in order to ensure compatible land uses. *[Revised Land Use Element Policy 4.8]*
- **Policy LU-3.5 Buffer Commercial Land Uses.** The City shall require that commercial land uses be buffered from incompatible land uses and protected from encroachment by incompatible uses – through the use of techniques including, but not limited to, landscaping, soundwalls, berms, fencing, open space setbacks, greenbelts, and building orientation. *[Existing Land Use Element Policy 4.18]*

The draft Land Use and Circulation Diagram (see Figure 1-2 in Chapter 1 of this Final EIR) dated April 4, 2007, indicates that one mile buffer around the WPWMA properties.

**Response to Comment O-6:** Commenter suggests that the landfill expansion property should remain under the jurisdiction of the County, consistent with the rest of the landfill property, and not be included in the proposed Sphere of Influence. The Western Regional Sanitary Landfill

Authority (WRSLA) is a public entity created by a joint powers agreement (JPA) pursuant to Government Code 6500 *et seq.* and is comprised of the County of Placer and the cities of Lincoln, Roseville, and Rocklin. Inclusion of the landfill expansion area in the City's proposed sphere of influence or its incorporation into the City would not alter jurisdiction over landfill operations. Pursuant to the terms of the JPA and state law, the WRSLA would be exempt from Lincoln's building and zoning ordinances.

### **Letter P. City of Rocklin**

**Response to Comment P-1:** Commenter notes the City of Rocklin's concerns regarding land use compatibility around the Western Regional Sanitary Landfill. Commenter notes that the placement of light and heavy industrial uses in the vicinity of the landfill should present less of a compatibility issue. Commenter also notes that compatibility issues can still arise with non-residential land uses and that issue should be addressed during the review of specific plans. Please refer to Master Response #1. Commenter is also directed to Policy PFS 5.8, which provides, "The City will promote the provision of adequate buffers for the Western Regional Landfill, in order to prevent the encroachment of incompatible land uses, which may compromise its long-term operations."

**Response to Comment P-2:** Commenter states that it requested as part of its NOP comments that traffic from the project area needs to be analyzed as to its impacts on highway 65 and on Rocklin streets including Whitney Ranch Parkway and Sunset Boulevard. Tables 5-31, 5-39, and 5-47 in the Draft EIR evaluate two major intersections along Whitney Ranch Parkway (called Whitney Boulevard in the Draft EIR):

- Whitney Ranch Parkway and Wildcat Boulevard (called Sioux Street in the Draft EIR)
- Whitney Ranch Parkway and University Avenue (called Atherton Road in the Draft EIR).

We regret that the Draft EIR did not refer to these roadways by their new names, but through this intersection analysis, the Draft EIR addresses the impacts of the City's Draft 2050 General Plan on Whitney Ranch Parkway. This change has been made to the Draft EIR. Please refer to Chapter 6 "Changes and Edits to the Draft and Recirculated Draft EIR."

**Response to Comment P-3:** Commenter states that Sioux Street has been re-named Wildcat Boulevard. This change has been made to the Draft EIR. Please refer to Chapter 6 "Changes and Edits to the Draft and Recirculated Draft EIR."

**Response to Comment P-4:** Commenter states that Stanford Ranch Road in Table 5-22 appears to be referring to West Stanford Ranch Road. Table 5-22 is referring to West Stanford Ranch Road, not Stanford Ranch Road.

**Response to Comment P-5:** Commenter states that the impact analysis on page 5-37 refers to the intersection of Sioux Street and Sunset Boulevard, which does not exist. Commenter is correct. The first bullet point on Page 5-37 should refer to the intersection at Wildcat Boulevard (called Sioux Street in the Draft EIR) and West Stanford Ranch Road (not Sunset Boulevard). This impact is shown correctly in Table 5-22 on that same page. The intersection of Sioux Street and Stanford Ranch Road should have been called Wildcat Boulevard and West Stanford Ranch Road on the following pages of the Draft EIR:

- Page 5-65, first bullet
- Page 5-87, first bullet
- Page 5-105, second bullet

This change has been made to the Draft EIR. Please refer to Chapter 6 “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment P-6:** Commenter inquires as to whether or not a screening analysis was used to help determine the scope and extent of the traffic study. A screening analysis was conducted to determine the intersections that may be impacted by the Draft 2050 General Plan. The travel demand model was used to determine the difference in traffic volumes between the No Project scenario and the Plus Project scenario. A level of service analysis was conducted for intersections where the model indicates a significant increase in traffic volume would occur. Some intersections in the proximity of the City of Lincoln were analyzed even if the model indicated that an increase in volume was not significant.

As indicated in the response to Comment P-2, one of the three intersections requested by Commenter, Whitney Ranch Parkway and Wildcat Boulevard, was evaluated in the Draft EIR. As noted in that response, the old names were used for these roadways in the Draft EIR.

As requested by Commenter, a LOS analysis was conducted at the Sunset Boulevard/Blue Oaks Boulevard and Sunset Boulevard/Stanford Ranch Road intersections and the results are presented below in revised Tables 5-22, 5-31, 5-39 and 5-47.

**REVISED TABLE 5-22  
PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS  
IN CITY OF ROCKLIN EXISTING PLUS PROJECT CONDITIONS**

#	Intersection		Existing Conditions			Existing Plus Project Conditions		
	North - South	East - West	V/C	Delay	LOS	V/C	Delay	LOS
1	Atherton Rd	Sunset Blvd	0.29		A	0.48		A

**REVISED TABLE 5-22**  
**PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS**  
**IN CITY OF ROCKLIN EXISTING PLUS PROJECT CONDITIONS**

#	Intersection		Existing Conditions			Existing Plus Project Conditions		
	North - South	East - West	V/C	Delay	LOS	V/C	Delay	LOS
2	West Stanford Ranch Rd	Sunset Blvd	0.12		A	0.56		A
3	Wildcat Blvd	West. Stanford Ranch Rd	0.06		A	<b>0.97</b>		<b>E</b>
4	Park Dr	Sunset Blvd	0.48		A	0.77		C
5	Sierra College Blvd	Granite Dr	0.62		B	<b>0.82</b>		<b>D</b>
6	Sierra College Blvd	WB I-80 ramps		32.2	C		29.5	C
7	Sierra College Blvd	EB I-80 ramps		20.7	C		9.5	A
11	Blue Oaks Blvd	Sunset Blvd	0.68		B	0.71		C
12	Stanford Ranch Rd	Sunset Blvd	0.62		B	0.80		C

Highlighted intersections were not included in DEIR

Source: DKS Associates, 2007

There are no impacts at these two additional intersections under Existing Plus Project, Cumulative Plus Project or Cumulative Plus Project without Placer Parkway conditions.

Under 2025 Plus Project conditions, there would be impacts at the Sunset Boulevard/Blue Oaks Boulevard and Sunset Boulevard/Stanford Ranch Road intersections. The proposed mitigation measure for the Sunset Boulevard/Blue Oaks Boulevard intersection is to add a second westbound right turn lane on Sunset Boulevard to provide LOS "D." The proposed mitigation measure for the Sunset Boulevard/Stanford Ranch Road intersection is to add a third northbound and southbound through lane on Stanford Ranch Road to provide LOS "C."

**REVISED TABLE 5-31  
PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS IN THE CITY OF ROCKLIN  
CUMULATIVE PLUS PROJECT CONDITIONS WITH MITIGATED TRANSPORTATION NETWORK**

#	Intersection		Cumulative No Project Conditions			Cumulative Plus Project Conditions			Cumulative Plus Project Conditions With Mitigated Transportation Network		
	North - South	East - West	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
1	Atherton Road West Stanford Ranch Rd	Sunset Blvd	0.82		D	0.79		C	0.77		C
2	Ranch Rd	Sunset Blvd	0.61		B	0.67		B	0.65		B
3	Wildcat Blvd	West Stanford Ranch Rd	0.82		D	<b>0.90</b>		<b>D</b>	<b>0.90</b>		<b>D</b>
4	Park Dr	Sunset Blvd	0.83		D	0.87		D	0.85		D
5	Sierra College Blvd	Granite Dr	0.87		D	<b>0.91</b>		<b>E</b>	0.90		D
6	Sierra College Blvd	WB I-80 ramps		19.9	B		19.2	B		19.4	B
7	Sierra College Blvd	EB I-80 ramps		12.4	B		10.8	B		10.8	B
8	Sierra College Blvd	Valley View Pkwy	1.00		E	0.96		E	0.94		E
9	Wildcat Blvd	Whitney Ranch Pkwy	0.99		E	0.94		E	0.96		E
10	University Ave	Whitney Ranch Pkwy	1.11		F	1.07		F	1.09		F
11	Blue Oaks Blvd	Sunset Blvd	0.98		E	0.99		E	0.99		E
12	Stanford Ranch	Sunset Blvd	0.70		C	0.76		C	0.75		C

Highlighted intersections were not included in DEIR

Source: DKS Associates, 2007

**REVISED TABLE 5-39**  
**PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS IN THE CITY OF ROCKLIN**  
**CUMULATIVE PLUS PROJECT CONDITIONS WITHOUT PLACER PARKWAY AND WITH MITIGATED TRANSPORTATION NETWORK**

#	Intersection		Cumulative Conditions			Cumulative Plus Project Conditions			Cumulative Plus Project Conditions With Mitigated Transportation Network		
	North - South	East - West	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
1	Atherton Road West Stanford	Sunset Blvd	0.77		C	0.76		C	0.77		C
2	Ranch Rd	Sunset Blvd West Stanford	0.73		C	<b>0.83</b>		<b>D</b>	0.77		C
3	Wildcat Blvd	Ranch Rd	0.72		C	<b>0.93</b>		<b>E</b>	<b>0.86</b>		<b>D</b>
4	Park Dr	Sunset Blvd	0.94		E	<b>0.99</b>		<b>E</b>	0.97		E
5	Sierra College Blvd	Granite Dr	0.91		E	0.93		E	0.92		E
6	Sierra College Blvd	WB I-80 ramps		19.9	B		19.5	B		19.5	B
7	Sierra College Blvd	EB I-80 ramps		12.9	B		12.6	B		12.5	B
8	Sierra College Blvd	Valley View Pkwy	0.91		E	0.88		D	0.87		D
9	Wildcat Blvd	Whitney Ranch Pkwy	0.70		B	0.71		C	0.73		C
10	University Ave	Whitney Ranch Pkwy	0.92		E	0.89		D	0.92		E
11	Blue Oaks Blvd	Sunset Blvd	0.99		E	0.99		E	0.99		E
12	Stanford Ranch	Sunset Blvd	0.72		C	0.77		C	0.74		C

Highlighted intersections were not included in DEIR

Source: DKS Associates, 2007

**REVISED TABLE 5-47  
PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS IN THE CITY OF ROCKLIN  
2025 PLUS PROJECT CONDITIONS WITHOUT PLACER PARKWAY**

#	Intersection		2025 Conditions			2025 Plus Project Conditions		
	North - South	East - West	V/C	Delay	LOS	V/C	Delay	LOS
1	Atherton Road	Sunset Blvd	0.56		A	0.67		B
2	West Stanford Ranch Rd	Sunset Blvd	0.83		D	<b>1.02</b>		<b>F</b>
3	Wildcat Blvd	West Stanford Ranch Rd	0.75		C	<b>0.95</b>		<b>E</b>
4	Park Dr	Sunset Blvd	0.95		E	<b>1.01</b>		<b>F</b>
5	Sierra College Blvd	Granite Dr	0.91		E	<b>0.97</b>		<b>E</b>
6	Sierra College Blvd	WB I-80 ramps		20.0	C		19.2	B
7	Sierra College Blvd	EB I-80 ramps		12.9	B		13.4	B
8	Sierra College Blvd	Valley View Pkwy	0.91		E	<b>1.02</b>		<b>F</b>
9	Wildcat Blvd	Whitney Ranch Pkwy	0.67		B	0.79		C
10	University Ave	Whitney Ranch Pkwy	0.49		A	0.67		B
11	Blue Oaks Blvd	Sunset Blvd	0.92		E	<b>0.97</b>		<b>E</b>
12	Stanford Ranch	Sunset Blvd	0.79		C	<b>0.81</b>		<b>D</b>

Highlighted intersections were not included in DEIR

Source: DKS Associates, 2007

As noted in the Draft EIR, the City of Rocklin can and should implement the suggested or similar mitigation but may choose not to. If the identified improvement is not made, these intersections would continue to operate at an unacceptable level of service. Therefore, as noted in the Draft EIR, this impact remains significant.

The impacts to the intersections along Sunset Boulevard would occur under 2025 conditions and not under cumulative conditions because SR 65 was assumed to be widened to 6 lanes by 2050 but not by 2025. An alternative mitigation to impacts along Sunset Boulevard would be the widening of SR 65 that parallels Sunset Boulevard. The changes to these tables will be made to the Draft EIR. Please see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment P-7:** Commenter states that a description of the locations of improvements suggested in the traffic and circulation mitigation measures be identified more clearly. The mitigation measures identified in the Draft EIR for the City of Rocklin are listed below with additional language to clarify where the identified improvement should occur.

Existing Plus Project Conditions

- TC-3a Construct a second left turn lane on the eastbound approach to improve the intersection of Sioux Street and Sunset Boulevard to LOS “B.”

As noted in the response to Comment P-5, this should refer to the intersection of Wildcat Boulevard and West Stanford Ranch Road and would add a second left turn lane on the eastbound West Stanford Ranch Road approach.

- TC-3b Construct a second through lane on the northbound and southbound approaches to improve the intersection of Sierra College Boulevard and Granite Drive to LOS “A.”

This improvement would widen Sierra College Boulevard to add a second through lane in each direction.

Cumulative (2050) Plus Project

- TC-12 Construct a second through lane on the northbound approach to improve the intersection of Sioux Street and Stanford Ranch Road to LOS “C.”

This refers to the intersection of Wildcat Boulevard and West Stanford Ranch Road. The future geometry was based on the Northwest Annexation EIR, which assumed a fourth leg on the south side of the intersection (a signal controlled driveway). This new approach may or may not need to be widened beyond what was assumed in the Northwest Annexation EIR depending on how large a development this driveway would provide access for, how many trips the development would produce, and the number of other driveways that would serve the development south of West Stanford Ranch Road.

- TC-19 Construct a second through lane on the northbound approach to improve the intersection of Sioux Street and Stanford Ranch Road to LOS “C.”

This refers to the intersection of Wildcat Boulevard and West Stanford Ranch Road. The future geometry was based on the Northwest Annexation EIR, which assumed a fourth leg on the south side of the intersection (a signal controlled driveway). This new approach may or may not need to be widened beyond what was assumed in the Northwest Annexation EIR depending on how large a development this driveway would provide access for, how many trips the development would produce, and the number of other driveways that would serve the development south of West Stanford Ranch Road.

- TC-26a Construct a second right turn lane on the westbound approach to improve the intersection of Stanford Ranch Road and Sunset Boulevard to LOS “D.”

This improvement would widen Sunset Boulevard by adding a second right turn lane.

- TC-26b Construct a second through lane on the northbound approach to improve the intersection of Sioux Street and Stanford Ranch Road to LOS “D.”

This refers to the intersection of Wildcat Boulevard and West Stanford Ranch Road. The future geometry was based on the Northwest Annexation EIR, which assumed a fourth leg on the south side of the intersection (a signal controlled driveway). This new approach may or may not need to be widened beyond what was assumed in the Northwest Annexation EIR depending on how large a development this driveway would provide access for, how many trips the development

would produce and the number of other driveways that would serve the development south of West Stanford Ranch Road.

- TC-26c Construct a third through turn lane on the southbound approach to improve the intersection of Park Drive and Sunset Boulevard to LOS “E.”

This improvement would widen Park Drive to add the third through lane.

- TC-26d Construct a third through lane on the northbound and southbound approach to improve the intersection of Sierra College Boulevard and Granite Drive to LOS “C.”

This improvement would widen Sierra College Boulevard to six lanes.

- TC-26e Construct a second left turn lane on the eastbound approach to improve the intersection of Sierra College Boulevard and Valley View Parkway to LOS “D.”

This improvement would widen Valley View Parkway to add a second left turn lane.

**Response to Comment P-8:** Commenter states that when mitigation measures suggest additional lanes, there should be some analysis as to whether adequate right-of-way exists, and if not, what other potential impacts may occur when having to acquire additional right-of-way. Additional right-of-way may or may not be needed to implement the various mitigation measures. An analysis of right-of-way could not be adequately conducted without a detailed design study at each location that would look at alternatives to acquiring additional right-of-way, including the narrowing of travel lanes, loss of landscaping, etc. The general feasibility of the mitigation measures was based on aerial photography that indicated it is unlikely that existing structures would need to be removed to implement the mitigation measure.

The Draft EIR identified measures that would mitigate traffic impacts in the City of Rocklin. The Draft EIR states that the City of Rocklin can and should implement the suggested or similar mitigation but may choose not to. If the identified improvements are not made, the roadway segments or intersections would continue to operate at an unacceptable level of service.

**Response to Comment P-9:** Commenter states that Valley View Parkway should be identified as not yet existing. Valley View Parkway is a proposed roadway in the City of Rocklin that was assumed to be implemented in the 2025 and Cumulative (2050) scenarios in the Draft EIR traffic analysis.

**Response to Comment P-10:** Commenter requests definition of “In” and “Ov” as seen on the exhibits depicting intersection land configurations. The “In” and “Ov” refer to the treatment of right-turns in the LOS calculations and are terms used in the TRAFFIX LOS software. The “In” means that right-turns are included in the calculation of “critical” movement volumes and “Ov” means that right turns can move during the “overlap” of a protected left turn signal phase on the cross-street.

**Response to Comment P-11:** Commenter states that the exhibits that depict the intersection of West Stanford Ranch Road and Sunset Boulevard need to reflect the existing extension of West

Stanford Ranch Road to Lonetree Boulevard/West Oaks Boulevard. The City will consider this revision to the Draft Circulation Diagram during preparation of the Final General Plan Update.

**Response to Comment P-12:** Commenter states that existing LOS conditions for Sierra College Boulevard and I-80 are incorrect. The Draft EIR did not show a deficient level of service at Sierra College and I-80 interchange intersections under existing conditions because the Highway Capacity Manual method of calculating LOS was used instead of the Circular 212 method. The Highway Capacity Manual method was used at all freeway ramp intersections in the Draft EIR, including those on Sierra College Boulevard in order to follow Caltrans traffic impact analysis guidelines. The Circular 212 method, used by the City of Rocklin in its traffic impact studies, has a more conservative assumption about the capacity of an intersection.

A Circular 212 calculation of existing conditions would show LOS "D" conditions at the intersection of Sierra College Boulevard with the westbound I-80 ramps and LOS "F" at the intersection of Sierra College Boulevard with the eastbound I-80 ramps.

**Response to Comment P-13:** Commenter states that the analysis of water supply did not constitute a water supply analysis per the requirements of SB 211 and 610. The City of Lincoln does not necessarily agree that the requirements of SB 221 and/or SB 610 apply to projects such as the Draft 2050 General Plan Update. However, the City has carefully examined its historical, current, and anticipated water supply needs and believes this analysis satisfies the informational requirements of SB 610. Such information is contained in Section 6.2 of the Draft EIR, Chapter 6 of the Background Report (Appendix B of the Draft EIR), Appendix F of the Draft EIR (the Water System Constraint Analysis), and Master Response #9. Additionally, and as noted in the referenced documents, the City of Lincoln, PCWA, and NID all have Urban Water Management Plans that address water supply reliability for the City of Lincoln. As noted in Master Response #9, PCWA's Integrated Water Resources Plan projects that it will supply the City with more treated water per year at General Plan build-out than the City anticipates needing. Given the anticipated availability of surface water to satisfy the water demands of the Project, the City does not anticipate a need for a capital outlay program, any permits to construct infrastructure for delivering water, or other regulatory approvals.

With respect to groundwater, the City primarily relies on surface water and only uses groundwater when necessary in back-up and emergency situations. The Project's potential impacts of groundwater pumping is discussed on pages 6-9 to 7-0 of the Draft EIR, and Master Response # 9 further discusses groundwater. As noted in Master Response # 9, a Memorandum of Understanding was signed by Lincoln, PCWA, and the City of Roseville to proceed with the West Placer County Groundwater Management Plan, which is in the process of being developed. Master Response # 9 also includes information about the historic average annual rate of groundwater and the ability of the basin to sustain itself indefinitely without a further decline in the subsurface groundwater level. As also noted in Master Response # 9, the City is conducting ongoing groundwater investigations to help determine optimal well spacing and pumping schedules.

Furthermore, analysis of water supply will also occur when specific development projects and specific plans are submitted to the City for review. Compliance with SB221 is required for a specific plan project after zoning action has been taken and tentative development maps have been submitted to the City for review.

**Response to Comment P-14:** Commenter suggests coordinating with Placer County Water Agency to initiate regional discussions regarding water supply availability. The City actively coordinates with the Placer County Water Agency, and a copy of the Draft EIR for the Draft 2050 General Plan was provided to the Agency for its review. Placer County Water Agency provided a comment letter (Comment Letter M) and stated that the Draft EIR adequately addresses the City's proposed water supply for its Draft 2050 General Plan Update. Please refer to Master Response #9 for additional discussion of water supply.

### ***Letter Q. City of Roseville***

**Response to Comment Q-1:** Commenter notes that, due to the 43-year timeframe of development that the Draft 2050 General Plan will influence, all phases of a project must be considered when evaluating its impact on the environment. This programmatic EIR is only required to analyze the broad implications of the Proposed Project. Future projects may tier off this EIR and prepare project-level EIRs. Please refer to Master Response #2.

**Response to Comment Q-2:** Commenter notes that the project description should be revised to include a section that indicates how the land uses will absorb over time based on an absorption study. Page 1-15 of Chapter 1, "Introduction and Reader's Guide," provides four key assumptions used for the analysis in the Draft EIR. The second assumption under the second bullet describes that overall buildout of the Draft 2050 General Plan is expected to occur by 2050 and that development under the Draft 2050 General Plan will be timed in response to market conditions; thus, no absorption study was conducted for the Draft General Plan. As a Program EIR, this document serves as a first tier document that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site specific environmental review may be required to assess future projects implemented under the program. Development within the Villages or the Special Use Districts will require the approval of a Specific Plan and annexation to the City. During this subsequent review, a project level analysis would occur to address both environmental and phasing issues. Without the details of a subsequent Specific Plan and an assessment of the conditions as they exist at that time, such an analysis at this stage would be speculative.

**Response to Comment Q-3:** Commenter states that the traffic analysis seemed to be based on the jobs/housing balance and not full buildout of the Draft 2050 General Plan. See the response prepared for Comment F-11.

**Response to Comment Q-4:** Commenter asks for a discussion regarding what steps the City would employ to build out the City in a manner that balances jobs and housing. The City will look to implement its Draft 2050 General Plan by requiring specific plans for each Village and Special Use District. During the review of the specific plans, the City will evaluate the projects

in many areas, such as infrastructure requirements, the fiscal implications of proposed development, and the balance of jobs and housing. Due to the location and placement of jobs and housing being subject to a variety of market forces, it is not likely that each individual project will be balanced as it moves through processing and developments.

But, each of the Villages and Special Use Districts comprise a part of the overall plan, which is designed as a whole to provide adequate land areas for a variety of uses that include basic jobs, service jobs, and housing opportunities. Part of the City's efforts will be to monitor the progress in such areas and to determine if it is appropriate to approve a particular project based upon its contribution to the City's overall goals and objectives. Because of the nature of market forces, it is often necessary to anticipate that housing development will precede the development of commercial or industrial development. The builders of such commercial facilities look for certain population levels to be present before they build and in the case of basic job producers, they look for the presence of an adequate labor force and/or housing supply to be present before selecting a site.

**Response to Comment Q-5:** Commenter asks how the City will ensure that it builds out in the manner of the jobs/housing balance approach. See Response to Comment Q-4. It is entirely possible that as the City develops over the next few years, market forces may increase (or decrease) existing levels of development. These changes in growth trends may increase (or decrease) the anticipated impacts identified in the Draft EIR. As previously described in the response prepared to Comment Q-4, individual specific plans will be prepared for the Villages and Special Use Districts. During the review of such specific plans, the City will evaluate the projects in many areas, such as infrastructure requirements, the fiscal implications of proposed development, and the balance of jobs and housing. Additionally, the environmental impacts resulting from these specific plans will also be identified during the environmental compliance phase of these specific plans. Future updates to the Draft 2050 General Plan will also address the City's jobs/housing balance to incorporate the best available information at that point in time. Please refer to Master Responses #7 and #8.

**Response to Comment Q-6:** Commenter states that because a specific land use absorption analysis that considers the timing of specific regional transportation improvements is not included in the Draft EIR, interim traffic impacts from the project may be understated. The comment is directed at the traffic analysis assumption of a jobs housing balance for the 2050 projected build-out and what the effects might be if housing builds in advance of jobs. The traffic model assumptions are based upon the SACOG traffic model assumptions of jobs per household; a similar method is employed in the South Placer traffic model. This regional average of jobs per dwelling unit is assumed to track as well with the development of the Draft 2050 General Plan, particularly as the south Placer area becomes more urbanized. This approach was deemed a reasonable method of anticipating both the growth of jobs and housing for the Draft 2050 General Plan and one compatible with other traffic models used in the region. As with any traffic model, there are a variety of assumptions that could be altered to generate a series of "what if" conditions. The traffic modeling effort used for the Draft 2050 General Plan contains assumptions that are based upon the experience of the region's growth and that are compatible with other traffic modeling efforts used within the Sacramento region. Please refer to Master Response #8 for a more in depth discussion of the basis for the growth projections for the Proposed Project.

**Response to Comment Q-7:** Commenter states that the traffic analysis in the Draft EIR does not consider full build-out of the Draft 2050 General Plan and that the jobs/housing balance traffic analysis could lead the reader to assume that there would be fewer traffic impacts resulting from the project than would actually occur. The Super-Cumulative scenario used in the Draft EIR attempts to represent a market-based development scenario for 2050. The supply of residential land in the Draft 2050 General Plan is expected to build out well before its non-residential land. The residential uses are expected to develop over the 45-year planning period of the Proposed Project – by 2050. The commercial and industrial land in the Draft 2050 General Plan may take 100 years to fully develop.

It should be noted that the amount of both residential and non-residential development in the City of Lincoln and in Placer County in the Cumulative (2050) development scenario is approximately equal to the amount of jobs and housing projected by SACOG for 2050.

**Response to Comment Q-8:** Commenter states that the Draft EIR did not fully analyze or disclose potentially significant traffic impacts in the City of Roseville. The Draft EIR evaluates impacts in the City of Roseville under a range of development and transportation scenarios; however, that analysis did not utilize the City of Roseville’s traffic model in evaluating project specific impacts. Staff from the cities of Lincoln and Roseville agree that the level of analysis contained in the Draft EIR along with additional information provided in the Response to Comment is sufficient for the programmatic nature of the EIR. However, as individual Specific Plans are processed, the City of Lincoln will include an evaluation on the City of Roseville’s transportation system using the City of Roseville’s traffic model. Additionally, the City of Lincoln will work with the City of Roseville to identify appropriate mitigation and provide fair share funding where determined appropriate by the City of Lincoln.

As indicated in Policy T-2.20 “Coordinate with Neighboring Jurisdictions”, the City will coordinate with neighboring jurisdictions to determine if acceptable and compatible levels of service, consistent with the circulation elements and level of service standards set forth in the City’s and the affected jurisdictions General Plans, on the roadways that extend into other jurisdictions can be achieved. That policy provides:

- **Policy T-2.20 Coordinate with Neighboring Jurisdictions.** The City will coordinate with neighboring jurisdictions to determine if acceptable and compatible levels of service, consistent with the circulation elements and level of services set forth in the City’s and the affected jurisdictions’ General Plans, on the roadways that extend into other jurisdictions can be achieved. As part of this effort the City will evaluate the feasibility of developing interagency funding mechanisms to construct mutually acceptable improvements. *[New Policy]*

The City will continue to participate in the South Placer Regional Transportation Authority (SPARTA) as part of an effort to develop interagency funding mechanisms to construct mutually acceptable regional transportation improvements. The City, as part of the Specific Plan or land use entitlement process, will require projects to fund or be responsible for the project’s fair share

To address this issue, the City is also considering adoption of the following new Policy T-2.21 “Multi-Jurisdictional Roadways”

- T-2.21 Multi –Jurisdictional Roadways.** As a specific example of implementation of Policy T-2.20 and without limiting its application into other roadways, Dowd Road has been identified as an important north/south roadway that will benefit the transportation network of several South Placer jurisdictions and will, therefore, be a regional roadway that will extend into other jurisdictions. The City will support the development of this roadway as a regional improvement and will coordinate its design and improvements with the County of Placer and the City of Roseville. The City, during the review of future specific plans that may affect the Dowd Road alignment and design, will coordinate with and participate with the County and the City of Roseville, and to plan and implement Dowd Road as a regional improvement. The City will require the projects to fund or be responsible for the project’s fair share of all feasible physical improvements identified as part of the City or as part of an interagency transportation plan and/or funding program to develop this regional roadway, provided a funding mechanism for payments and improvements is in place at the time that a specific plan or project land use application or subdivision approval affecting Dowd Road is considered by the City. *[New Policy – Final EIR]*

**Response to Comment Q-9:** Commenter requests that Policy T-1.2 be strengthened to ensure that future development pays its fair share for regional transportation facilities. As noted in the response to Comments D-4 and F-13, the City supports PCTPA’s efforts to define and implement the Transportation Expenditure Plan that will fund improvements to the major transportation system serving Placer County, including improvements to SR 65 and construction of Placer Parkway. The Dowd Road extension would connect Western Lincoln with a “backdoor” connection to Placer Ranch and with Westside Drive in the City of Roseville. Thus this roadway serves three jurisdictions. The City is prepared to work with other jurisdictions to fund the Dowd Road extension

**Response to Comment Q-10:** Commenter states that additional intersections should be analyzed in the EIR. An LOS analysis was conducted at the intersections requested by Commenter and is summarized in revised Tables 5-24, 5-33, 5-41 5-47 below.

Under Existing Plus Project conditions, one additional impact was identified at the intersection of Washington Boulevard with Blue Oaks Boulevard. The proposed mitigation measure is to construct the CIP improvements at this intersection.

Under Cumulative Plus Project and Cumulative Plus Project Without Placer Parkway conditions, no additional impacts were identified at the added intersections. Under 2025 Plus Project conditions, there are two additional impacts at the added intersections of Washington Boulevard with Blue Oaks Boulevard and Washington Boulevard with Roseville Parkway. The analysis assumes the intersection geometrics in the City of Roseville’s 2020 CIP, which represents the ultimate improvements at the intersection of Washington Boulevard with Blue Oaks Boulevard. Improvements beyond those assumed in City of Roseville’s 2020 CIP were not considered feasible at this intersection.

The proposed mitigation measure for the intersection of Washington Boulevard with Roseville Parkway is to construct a third through lane on either the northbound and southbound (Washington Boulevard) approaches or the eastbound and westbound (Roseville Parkway) approaches to this intersection.

Impacts were identified at these two intersections on Washington Boulevard under 2025 Plus Project conditions, but not under Cumulative Plus Project conditions that assumes several improvements to regional roadways, including the widening of SR 65, which is parallel to Washington Boulevard. A potential mitigation measure for the impacts at these intersections is the widening of SR 65 through the City of Roseville by 2025.

As noted in the Draft EIR, the City of Roseville can and should implement the suggested or similar mitigation but may choose not to. If the identified improvement is not made, these intersections would continue to operate at an unacceptable level of service. Therefore, as noted in the Draft EIR, this impact remains significant.

**REVISED TABLE 5-24  
PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS IN  
CITY OF ROSEVILLE EXISTING PLUS PROJECT CONDITIONS**

#	Intersection		Existing Conditions		Existing Plus Project Conditions	
	North - South	East - West	V/C	LOS	V/C	LOS
1	Foothills Blvd	Blue Oaks Blvd	0.47	A	0.61	B
2	Fiddymt Rd	Pleasant Grove Rd	0.60	A	0.73	C
3	Foothills Blvd	Pleasant Grove Rd	0.86	D	<b>0.94</b>	<b>E</b>
7	Washington Blvd	Blue Oaks Blvd	0.58	A	<b>0.81</b>	<b>D</b>
8	Washington Blvd	Roseville Pkwy	0.42	A	0.75	C
9	Washington Blvd	Pleasant Grove Blvd	0.62	B	0.64	B
10	Roseville Pkwy	Pleasant Grove Blvd	0.65	B	0.63	B
11	Foothills Blvd	Junction Blvd	1.02	F	1.06	F

Highlighted intersections were not included in DEIR

Source: DKS Associates, 2007

**REVISED TABLE 5-33  
PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS IN THE CITY OF ROSEVILLE  
CUMULATIVE PLUS PROJECT CONDITIONS WITH MITIGATED TRANSPORTATION NETWORK**

#	Intersection		Cumulative No Project Conditions		Cumulative Plus Project Conditions		Cumulative Plus Project With Mitigated Transportation Network	
	North - South	East - West	V/C	LOS	V/C	LOS	V/C	LOS
1	Foothills Blvd	Blue Oaks Blvd	1.14	F	1.13	F	1.12	F
2	Fiddymt Rd	Pleasant Grove Rd	1.26	F	1.26	F	1.26	F

**REVISED TABLE 5-33**  
**PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS IN THE CITY OF ROSEVILLE**  
**CUMULATIVE PLUS PROJECT CONDITIONS WITH MITIGATED TRANSPORTATION NETWORK**

#	Intersection		Cumulative No Project Conditions		Cumulative Plus Project Conditions		Cumulative Plus Project With Mitigated Transportation Network	
	North - South	East - West	V/C	LOS	V/C	LOS	V/C	LOS
3	Foothills Blvd	Pleasant Grove Rd	1.13	F	1.13	F	1.09	F
4	Westside Dr	Blue Oaks Blvd	1.02	F	1.00	E	<b>1.18</b>	<b>F</b>
5	Fiddymt Rd	Blue Oaks Blvd	1.13	F	1.15	F	1.10	F
6	Westside Dr	Pleasant Grove Rd	0.61	B	0.61	B	0.70	B
7	Washington Blvd	Blue Oaks Blvd	0.91	E	0.95	E	0.93	E
8	Washington Blvd	Roseville Pkwy	0.84	D	0.87	D	0.83	D
9	Washington Blvd	Pleasant Grove Blvd	1.01	F	1.02	F	1.02	F
10	Roseville Pkwy	Pleasant Grove Blvd	1.07	F	1.07	F	1.07	F
11	Foothills Blvd	Junction Blvd	1.06	F	1.08	F	1.07	F

Highlighted intersections were not included in DEIR

Source: DKS Associates, 2007

**REVISED TABLE 5-41**  
**PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA INTERSECTIONS IN THE CITY OF ROSEVILLE**  
**CUMULATIVE PLUS PROJECT CONDITIONS WITHOUT PLACER PARKWAY AND WITH**  
**MITIGATED TRANSPORTATION NETWORK**

#	Intersection		Cumulative Conditions		Cumulative Plus Project Conditions		Cumulative Plus Project With Mitigated Transportation Network	
	North - South	East - West	V/C	LOS	V/C	LOS	V/C	LOS
1	Foothills Blvd	Blue Oaks Blvd	1.23	F	1.24	F	1.19	F
2	Fiddymt Rd	Pleasant Grove Rd	1.33	F	1.32	F	1.29	F
3	Foothills Blvd	Pleasant Grove Rd	1.2	F	1.19	F	1.18	F
4	Westside Dr	Blue Oaks Blvd	1	E	1.01	F	<b>1.17</b>	<b>F</b>
5	Fiddymt Rd	Blue Oaks Blvd	1.26	F	<b>1.36</b>	<b>F</b>	1.19	F
6	Westside Dr	Pleasant Grove Rd	0.7	C	0.71	C	0.76	C
7	Washington Blvd	Blue Oaks Blvd	1.00	E	0.98	E	0.97	E
8	Washington Blvd	Roseville Pkwy	1.00	F	0.98	E	0.97	E
9	Washington Blvd	Pleasant Grove Blvd	1.08	F	1.07	F	1.08	F
10	Roseville Pkwy	Pleasant Grove Blvd	1.15	F	1.14	F	1.13	F
11	Foothills Blvd	Junction Blvd	1.15	F	1.16	F	1.12	F

Highlighted intersections were not included in DEIR

Source: DKS Associates, 2007

**REVISED TABLE 5-49  
PM PEAK HOUR LEVEL OF SERVICE AT STUDY AREA  
INTERSECTIONS IN THE CITY OF ROSEVILLE  
2025 PLUS PROJECT CONDITIONS WITHOUT PLACER PARKWAY**

#	Intersection		2025 Conditions		2025 Plus Project Conditions	
	North - South	East - West	V/C	LOS	V/C	LOS
1	Foothills Blvd	Blue Oaks Blvd	1.09	F	<b>1.15</b>	<b>F</b>
2	Fiddymment Rd	Pleasant Grove Rd	1.15	F	1.16	F
3	Foothills Blvd	Pleasant Grove Rd	1.11	F	1.11	F
4	Westside Dr	Blue Oaks Blvd	0.68	B	0.75	C
5	Fiddymment Rd	Blue Oaks Blvd	0.91	E	0.94	E
6	Westside Dr	Pleasant Grove Rd	0.57	A	0.45	A
7	Washington Blvd	Blue Oaks Blvd	1.05	F	<b>1.11</b>	<b>F</b>
8	Washington Blvd	Roseville Pkwy	0.84	D	<b>0.91</b>	<b>E</b>
9	Washington Blvd	Pleasant Grove Blvd	1.00	F	1.04	F
10	Roseville Pkwy	Pleasant Grove Blvd	1.10	F	1.14	F
11	Foothills Blvd	Junction Blvd	1.10	F	1.11	F

Highlighted intersections were not included in DEIR  
Source: DKS Associates, 2007

**Response to Comment Q-11:** Commenter requests that daily volumes on Blue Oaks Blvd., Pleasant Grove Blvd., Washington Blvd., and Baseline Road be identified. The estimated daily traffic volumes on the requested roadways are shown in Tables Q-1 through Q-4 below.

**TABLE Q-1  
ESTIMATED DAILY TRAFFIC VOLUMES –  
ADDITIONAL ROADWAY SEGMENTS IN CITY OF ROSEVILLE  
EXISTING PLUS PROJECT CONDITIONS**

Roadway	From	To	Average Daily Traffic Volume	
			Existing	Existing Plus Project
Blue Oaks Blvd	Fiddymment Rd	Woodcreek Oaks	12,600	19,600
Blue Oaks Blvd	Woodcreek Oaks	Foothills Blvd	27,400	31,200
Blue Oaks Blvd	Foothills Blvd	Washington Blvd	38,700	40,500
Pleasant Grove Blvd	Fiddymment Rd	Woodcreek Oaks	9,800	7,700
Pleasant Grove Blvd	Woodcreek Oaks	Foothills Blvd	24,800	26,900
Pleasant Grove Blvd	Foothills Blvd	Washington Blvd	36,000	39,500
Pleasant Grove Blvd	Washington Blvd	Roseville Pkwy	41,300	40,800
Baseline Rd	Junction Blvd	Woodcreek Oaks	15,100	16,800
Baseline Rd	Woodcreek Oaks	Foothills Blvd	19,800	19,500
Washington Blvd	Blue Oaks Blvd	Roseville Pkwy	9,700	14,700
Washington Blvd	Roseville Pkwy	Pleasant Grove Blvd	10,000	12,300

Source: DKS Associates, 2007

**TABLE Q-2  
ESTIMATED DAILY TRAFFIC VOLUMES – ADDITIONAL ROADWAY SEGMENTS IN CITY OF ROSEVILLE  
CUMULATIVE (2050) PLUS PROJECT CONDITIONS**

<b>Roadway</b>	<b>From</b>	<b>To</b>	<b>Cumulative No Project</b>	<b>Cumulative Plus Project</b>	<b>Cumulative Plus Project Mitigated</b>
Blue Oaks Blvd	Fiddymment Rd	Woodcreek Oaks	54,500	54,800	53,400
Blue Oaks Blvd	Woodcreek Oaks	Foothills Blvd	76,800	76,400	75,300
Blue Oaks Blvd	Foothills Blvd	Washington Blvd	69,900	71,200	70,100
Pleasant Grove Blvd	Fiddymment Rd	Woodcreek Oaks	39,100	39,100	38,700
Pleasant Grove Blvd	Woodcreek Oaks	Foothills Blvd	62,600	62,500	61,900
Pleasant Grove Blvd	Foothills Blvd	Washington Blvd	64,900	65,100	64,500
Pleasant Grove Blvd	Washington Blvd	Roseville Pkwy	65,100	64,600	64,500
Baseline Rd	Junction Blvd	Woodcreek Oaks	42,100	43,000	42,100
Baseline Rd	Woodcreek Oaks	Foothills Blvd	41,700	41,500	41,300
Washington Blvd	Blue Oaks Blvd	Roseville Pkwy	28,300	32,000	31,500
Washington Blvd	Roseville Pkwy	Pleasant Grove Blvd	23,800	25,600	24,700

Source: DKS Associates, 2007

**TABLE Q-3  
ESTIMATED DAILY TRAFFIC VOLUMES – ADDITIONAL ROADWAY SEGMENTS IN CITY OF ROSEVILLE  
CUMULATIVE (2050) PLUS PROJECT WITHOUT PLACER PARKWAY CONDITIONS**

<b>Roadway</b>	<b>From</b>	<b>To</b>	<b>Cumulative No Project without Placer Parkway</b>	<b>Cumulative Plus Project without Placer Parkway</b>	<b>Cumulative Plus Project Mitigated without Placer Parkway</b>
Blue Oaks Blvd	Fiddymment Rd	Woodcreek Oaks	62,000	63,600	57,400
Blue Oaks Blvd	Woodcreek Oaks	Foothills Blvd	81,900	80,200	80,000
Blue Oaks Blvd	Foothills Blvd	Washington Blvd	81,300	79,100	78,100
Pleasant Grove Blvd	Fiddymment Rd	Woodcreek Oaks	40,500	40,900	40,200
Pleasant Grove Blvd	Woodcreek Oaks	Foothills Blvd	66,600	66,000	65,700
Pleasant Grove Blvd	Foothills Blvd	Washington Blvd	69,200	68,700	67,900
Pleasant Grove Blvd	Washington Blvd	Roseville Pkwy	67,700	67,500	66,900
Baseline Rd	Junction Blvd	Woodcreek Oaks	44,000	44,000	43,700
Baseline Rd	Woodcreek Oaks	Foothills Blvd	42,800	41,800	41,600
Washington Blvd	Blue Oaks Blvd	Roseville Pkwy	30,800	34,000	33,400
Washington Blvd	Roseville Pkwy	Pleasant Grove Blvd	27,500	28,100	26,800

Source: DKS Associates, 2007

**TABLE Q-4  
ESTIMATED DAILY TRAFFIC VOLUMES –  
ADDITIONAL ROADWAY SEGMENTS IN CITY OF ROSEVILLE  
2025 PLUS PROJECT CONDITIONS**

Roadway	From	To	Average Daily Traffic Volume	
			2025 No Project	2025 Plus Project
Blue Oaks Drive	Fiddymment Rd	Woodcreek Oaks	54,500	55,000
Blue Oaks Drive	Woodcreek Oaks	Foothills Blvd	74,700	74,300
Blue Oaks Drive	Foothills Blvd	Washington Blvd	75,700	75,100
Pleasant Grove Rd	Fiddymment Rd	Woodcreek Oaks	38,100	37,200
Pleasant Grove Rd	Woodcreek Oaks	Foothills Blvd	62,000	61,400
Pleasant Grove Rd	Foothills Blvd	Washington Blvd	66,700	66,500
Pleasant Grove Rd	Washington Blvd	Roseville Pkwy	65,700	65,500
Baseline Rd	Junction Blvd	Woodcreek Oaks	39,900	39,100
Baseline Rd	Woodcreek Oaks	Foothills Blvd	38,900	38,900
Washington Blvd	Blue Oaks Blvd	Roseville Pkwy	37,700	40,000
Washington Blvd	Roseville Pkwy	Pleasant Grove Blvd	26,000	26,200

Source: DKS Associates, 2007

**Response to Comment Q-12:** Commenter requests a revision to the last paragraph on page 5-10 of the Draft EIR. The suggested revision will be made. Please see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment Q-13:** Commenter states that Table 2-13 should assume college enrollment in Roseville to be 8,000 students. It appears that Commenter is referring to Table 5-13, not Table 2-13. This table summarizes the development assumptions in the Cumulative (2050) No Project Scenario, which assumed buildout of the current Hewlett Packard Master Plan. It did not assume that the land uses in the Hewlett Packard Master Plan would be modified to include a college on that site. Such an assumption would have been speculative.

**Response to Comment Q-14:** Commenter states that the assumed geometries of the Sunset West Blvd./Dowd Road and University Blvd./Dowd Road intersections be identified. The intersection geometries are provided in Appendix E of the Draft EIR. The assumed geometries for these intersections are as follows:

Sunset Boulevard West/Dowd Road

- Northbound approach: 1 left, 3 through and 1 exclusive right turn lanes
- Southbound approach: 1 left, 3 through and 1 exclusive right turn lanes
- Eastbound approach: 1 shared left, through and right lane
- Westbound approach: 1 shared left, through and right lane

University Boulevard/Dowd Road

- Northbound approach: no left, 3 through and 1 exclusive right turn lanes
- Southbound approach: 1 left, 3 through and no right turn lanes
- Eastbound approach: none
- Westbound approach: 2 left, no through and 1 exclusive right turn lanes

**Response to Comment Q-15:** Commenter requests a revision to the first paragraph on page 5-29 of the Draft EIR. The suggested revision will be made. Please see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment Q-16:** Commenter states that the reference to Baseline Road on page 5-47 of the Draft EIR is incorrect and should refer to Fiddymont Road. This change has been made to the Draft EIR. Please refer to Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment Q-17:** Commenter states that the Draft EIR should note that when Lincoln becomes classified as an urbanized area, the funding picture for Lincoln Transit will change (e.g., eligibility for FTA 5307 funds). The City considered this comment and does not believe the requested change is necessary.

**Response to Comment Q-18:** Commenter states that the Bus Rapid Transit Study for South Placer County should be referenced in the Draft EIR. PCTPA recently completed a Bus Rapid Transit (BRT) Implementation Study for South Placer County. The study recommended three potential BRT routes that would connect the proposed CSUS Placer campus in the proposed Placer Ranch development with the Galleria in Roseville and Sacramento Regional Transit’s light rail at Watt/I-80 and in Folsom. Feeder bus service would be needed to connect the City of Lincoln to these proposed BRT routes. The proposed CSUS campus site within the Placer Ranch project is part of a specific plan application that was formerly under review by Placer County and is currently under review by the City of Roseville. Given the speculative nature of this project and the programmatic level of the Draft EIR a detailed analysis of potential feeder bus connections is uncertain at this time. As noted in Master Response #2, subsequent Specific Plans and their environmental analysis will provide an opportunity to evaluate the expansion of transit systems.

**Response to Comment Q-19:** Commenter states that the DEIR should reference the potential for a South Placer Area Dial-a-Ride service, which is being studied by the Placer County Transportation Agency. Please see response to Comment Q-18.

**Response to Comment Q-20:** Commenter states that the DEIR should evaluate the increase in demand for commuter bus service from Lincoln to Roseville and the Sacramento area. Impact TC-8 in the Draft EIR identifies that the increase in demand for transit may result in unmet transit service. The mitigation measure for this impact provides that the City will continue to

implement a variety of policies and implementation measures designed to ensure that impacts associated with future growth and the provision of adequate transit services are addressed. However, the impact would remain significant after mitigation.

**Response to Comment Q-21:** Commenter states that the Draft EIR should identify the need for additional diamond lanes along Highway 65. The Draft EIR evaluated additional mixed-flow lanes on SR 65 in the Cumulative (2050) scenarios. This assumption is consistent with assumptions used by PCTPA for 2040 in the Placer Parkway Tier 1 EIS/EIR analysis.

**Response to Comment Q-22:** Commenter states that the demand for commuting and recreation bicycling is expected to increase and the Draft 2050 General Plan should accommodate and plan for both. Commenter suggests deleting the text, “especially for recreational experiences”, in Impact TC-9. Commenter is correct that the increase in development from the Draft 2050 General Plan would increase the demand for both commuting and recreational bicycling. There have been no technical studies prepared to analyze the effects of the Proposed Project to demand for bicycling facilities. The analysis for Impact TC-9 is intended to be qualitative and presents a general description of demand for bicycling facilities that would be expected to occur with the Proposed Project’s increase in development and associated population increase.

**Response to Comment Q-23:** Commenter notes that the City’s Draft EIR should reference the need to update Lincoln’s Bikeway Master Plan as the Draft 2050 General Plan develops. The City does anticipate that the Bikeway Master Plan will be updated as each Specific Plan for a Village or Special Use District is approved by the City. During the review of future Specific Plans, the bikeway system for each Village or Special Use District will be incorporated into the Bikeway Master Plan.

**Response to Comment Q-24:** Commenter requests that the City of Lincoln consider a bikeway link from Village 6 into the City of Roseville’s system through the Reason Farms property and that Draft 2050 General Plan Policy T-5.2 be modified to include this connection. Policy T-5.2 provides, “The City shall promote and support the development of local and regional bikeway links as established in the City Bikeways Master Plan and the County Bikeway Master Plan.”

During the review of the Village 6 Specific Plan, the City will consider the potential for such a linkage. At this stage, there are not sufficient details of development within Village 6 to determine if this is a feasible connection. Please refer to Master Response #2 and #7.

**Response to Comment Q-25 and Q-26:** Commenter states that the City should strive to obtain an ISO rating of three in order to mitigate potential impacts to Roseville fire services. In consideration of this request, the City has reviewed its Draft Goals and Policies Report. Specific policies (including PFS-8.4 “Fire Response Times,” PFS-8.5 “Provision of Fire Station Facilities and Equipment,” and PFS-8.7 “Sprinkler Requirements”) from the Draft 2050 General Plan reflect a variety of fire protection measures and standards that will help implement City goals designed to protect human health and safety issues. These policies provide as follows:

- **Policy PFS-8.4 Fire Response Times.** The City shall strive to maintain a firefighting capability sufficient to maintain a fire response time of five (5) minutes or less as a general guideline for service provision and locating new fire stations. *[Modified Existing Policy, Public Facilities Element]*
- **Policy PFS-8.5 Provision of Fire Station Facilities and Equipment.** The City shall provide fire station facilities, equipment (engines and other apparatus), and staffing necessary to maintain the City's service standards (ISO rating and response time). *[New Policy]*
- **Policy PFS-8.7 Sprinkler Requirements.** The City shall require sprinklers in all new commercial, industrial and multifamily structures, as well as single family residential structures that are outside of the City's targeted response times. *[Modified Existing Policy, Public Facilities Element]*

The City considers the proposed policies adequate to address this issue.

**Response to Comment Q-27:** Commenter notes that the currently planned joint library project between the Cities of Roseville and Lincoln are designed to serve the current population, and as the population and needs expand, the facility will be required to expand to keep pace with population growth. The City of Lincoln as part of its Public Facilities Element improvement program requires that new development pay its Community Services fee, which provides funding for capital improvements to the City Library system as well as other City facilities.

**Response to Comment Q-28:** Commenter notes concern regarding the impact on Roseville library services that would occur if funding does not permit additional facilities to be built and enlarged collections to be in place to serve future residents. Commenter's concerns regarding future library services and facilities and the funding of those facilities and services are addressed in Impact PFS-20 on page 6-49. Specifically, this impact analysis cites Policies PFS-1.1, PFS-9.3, and PFS-9.5 as mitigation measures that require planning and expansion of library services. Policy PFS-9.4 is also cited as a mitigation measure that requires the City to develop a funding mechanism for construction and operation of future libraries. Those policies are as follows:

- **Policy PFS-1.1 Maintain Adequate Public Services.** The City shall ensure the provision of adequate public services and facilities to the existing areas of the city and to ensure that new development is served by a full range of public services. *[Modified Existing Policy 1, Public Services and Facilities Element]*
- **Policy PFS-9.3 Expand Library Services.** The City shall continue to expand library services, according to adopted City library standards (0.7 square feet per capita), to meet the educational, informational, and cultural needs of all community residents. *[Revised Policy – Draft EIR Analysis]*

- **Policy PFS-9.4 Funding Mechanism for Libraries.** The City shall provide a funding mechanism for the construction and operation of libraries within the city. *[Modified Existing Policy, Public Facilities Element]*
- **Policy PFS\_9.5 Siting of Libraries.** The City shall locate libraries near or adjacent to other City facilities, such as schools and parks, wherever possible. *[Modified Existing Policy, Public Facilities Element]*

**Response to Comment Q-29:** Commenter suggests a mitigation measure be required in the Final EIR requiring that new development fund expansion of library services and establishing timing for when new library facilities and services would be required, and including a funding mechanism. Please refer to the response prepared for Comment Q-28.

**Response to Comment Q-30:** Commenter states that the Final EIR should include analysis of project impacts to the West Placer Waste Management Authority, and appropriate mitigation measures should be identified to minimize impacts to WPWMA facilities and maximize landfill life. Refer to the response prepared for Comment O-3.

## **Organizations**

### ***Letter R. Lincoln Rifle Club and Junior Division (Grant Macomber)***

**Response to Comment R-1:** Commenter provides a history of the Lincoln Rifle Club including membership, training, facilities, usage and type of firearms used at the range. No specific response is required.

**Response to Comment R-2:** Commenter states that the current agricultural land uses adjacent to range are compatible. No specific response is required.

**Response to Comment R-3:** Commenter states that conflicts with an applicable land use policy create a significant impact and refers to the Draft EIR page 4-18. This reference may be referring to “Standards of Significance” beginning on page 4-17, which describes criteria for determining significant impacts, outlined on page 4-18. At the top of page 4-18, six bullets identify criteria that would result in a significant impact. The second bullet states, “Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigation a significant environmental effect.” As this comment regarding standards of significant impacts is unclear, this response addresses this comment as well as possible; no further response is required.

**Response to Comment R-4:** Commenter states that an applicable land use policy is to provide adequate buffers around the outdoor shooting range (Draft 2050 General Plan, page 4-27). Commenter also states that open space or recreational buffers should be used to create buffers between incompatible land uses (Draft 2050 General Plan, page 7-1). Commenter appears to merely identify policies. Thus, no specific response is required.

Additionally, the Draft 2050 General Plan on page 4-27 under “Village 2 (V-2)” in the fifth bullet states that “Adequate buffers around the outdoor shooting range shall be incorporated. The specific plan for this Village will require a study supporting the buffer proposed.” Please refer to Master Response # 7.

**Response to Comment R-5:** Commenter states that Village 2 would have over 7,700 persons per square mile, which creates a significant effect on the environment vis a vis the Dillman Range and the applicable land use policies.

The Draft EIR on page 4-8 presents the land uses (Table 4-3) and residential population (Table 4-4) for Village 2. Village 2 encompasses 1,680 acres and has a projected population of 10,250 persons, which results in 6 persons per acre. Refer to the response prepared for Comment R-4 regarding compatibility.

**Response to Comment R-6:** Commenter indicates that an adequate buffer is needed around the Dillman Range for its continued uses and indicates the 570 acres of open space is not nearly enough to be an adequate buffer.

The 570 acres of open space represents the 40% requirement. Refer to Master Response # 6. The amount of buffer for the Dillman Range will be determined in the specific plan for Village 2. Refer to the response prepared for Comment R-4.

**Response to Comment R-7:** Commenter requested a 60 day extension to provide written comments on the Draft EIR. Commenter did not provide any reason(s) for this request; therefore the City did not extend the public review period of the Draft EIR. The Draft EIR public review period was from October 3, 2006 to November 16, 2006. The Draft EIR public review period was noticed in the local newspaper twice, posted at City Hall, and a notice of Draft EIR public review was sent to all persons on the Draft 2050 General Plan Update notification list of approximately 240 people. The Draft EIR was distributed to more than 50 federal, state, county and local agencies.

***Letter S. Low Speed Vehicle Group of Lincoln Hills  
(Roger Oldenkamp, Vice President)***

**Response to Comment S-1:** Commenter feels that the Draft EIR does not provide sufficient information related to the City’s current Neighborhood Electric Vehicle Transportation Plan. Please see Master Response #5.

***Letter T. Low Speed Vehicle Group of Lincoln Hills (Robert Gelber, Member)***

**Response to Comment T-1:** Commenter feels that the Draft EIR does not provide sufficient information related to the City’s current Neighborhood Electric Vehicle Transportation Plan. Please refer to Master Response #5.

**Letter U. Low Speed Vehicle Group of Lincoln Hills (Jim Sarver, Member)**

**Response to Comment U-1:** Commenter feels that the Draft EIR does not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please refer to Master Response #5.

**Letter V. Sierra Club, Mother Lode Chapter**

**Response to Comment V-1:** Commenter expresses concerns regarding the City's proposed sphere of influence and expresses an opinion that the DEIR fails to fully analyze all the significant impacts of the project and fails to provide feasible mitigation to reduce the impacts to a less than significant level. The City of Lincoln does not agree with the comment. Both the Draft EIR and the Recirculated Draft EIR comply with the CEQA requirements for the analysis of environmental impacts by including a complete and comprehensive evaluation of the physical impacts of the project and its alternatives. Additionally, the EIR identifies ways to minimize significant effects of the project, and describes reasonable alternatives.

The Draft EIR evaluates the potential impacts resulting from adoption and implementation of the project. The information contained in this EIR informs the decision-makers and the general public of any significant environmental impacts associated with the project, and identifies where feasible mitigation that can reduce impacts to a less than significant level or, in some instances, identifies mitigation that will lessen impacts that will remain significant and unavoidable. The CEQA Guidelines permit a Program EIR to be used for a general plan. According to CEQA Guideline section 15168(a), a local agency may prepare a Program-level EIR to address a series of actions that can be characterized as one large project or a series of actions that are linked geographically, logical parts of a chain of contemplated events, rules, regulations or plans that govern the conduct of a continuing program, or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. This EIR is a Program EIR and is a first-tier environmental document for subsequent environmental review of specific plans, infrastructure improvements, general plan and zoning amendments, and other local development proposals. Also see Master Response #2.

**Response to Comment V-2:** Commenter expresses views of the Draft 2050 General Plan's underlying design concept. The Draft 2050 General Plan does not ignore its place within the Sacramento region. The Draft 2050 General Plan has tracked closely with the efforts of the Sacramento Area Council of Governments Blueprint Transportation project. This planning effort which involved the six counties and cities within the counties in the region undertook an evaluation of growth over the next 50 years on how best to direct future development both in its location within the region and the pattern of development that should be utilized to improve the region's transportation system. As part of that effort, Placer County and the various cities were anticipated to receive a projected level of development over that timeframe. The City's Draft 2050 General Plan closely tracked with that planning effort and is consistent with the Blueprint's smart growth principles. The seven smart growth principles promoted by SACOG are proposed to be adopted as Policies LU-1.6 through LU-1.12, which read as follows:

- **Policy LU-1.6 Transportation Choices.** The City will promote the application of land use layouts and community designs that provide residents with transportation choices to walk, ride bicycles, ride transit services, as well as utilize a vehicle, including neighborhood electric vehicles. *[New Policy]*
- **Policy LU-1.7 Housing Choices.** The City will promote the application of land use designs that provide a variety of places where residents can live, including apartments, condominiums, townhouses and single family attached and detached. *[New Policy]*
- **Policy LU-1.8 Compact Development.** The City will promote the use of development patterns that are more compactly built and use space in an efficient but aesthetic manner to promote more walking, biking and use of public transit. *[New Policy]*
- **Policy LU-1.9 Existing Assets.** The City will promote the use of vacant infill parcels and the intensifying of land uses on parcels that are underutilized in order to better utilize existing public infrastructure. In conjunction with this effort the City will support the reuse and refurbishing of existing structures within the historic downtown. *[New Policy]*
- **Policy LU-1.10 Mixed Land Uses.** Within the designated Village areas, the City will promote a mixed land use designed to place homes together with smaller businesses, institutional, and community land uses. The Village Core area will utilize the Mixed Use (MU) designation. Mixed land uses could include vertical as well as horizontal design allowing for differing land uses within the same building, as well as within the same project area. *[New Policy]*
- **Policy LU-1.11 Natural Resource Conservation.** To promote a high quality of life within the community, the City will in conjunction with related policies in other general plan elements, promote the retention of natural open space areas, greenbelts and the provision of adequate parks as part of approving new land use designs. *[New Policy]*
- **Policy LU-1.12 Quality Design.** Through the design review process, apply design standards that promote the use of high quality building materials, architectural and site designs, landscaping signage and amenities. The City will continue to develop and apply design standards that result in efficient site and building designs, pedestrian friendly projects that stimulate the use of alternative modes of transportation, and a functional relationship between adjacent developments. *[New Policy]*

The Draft 2050 General Plan discusses the general characteristics of the proposed Village concept; see Section 4.4 Village, Overview, on page 4-24. In the general discussion of the Village concept, it is noted that each village is to be characterized by extensive bicycle and pedestrian trails and open space, with attention given to the interconnection of the Villages to each other and the other developed portions of the City. This interconnection is in addition to the City's efforts to implement a Neighborhood Electric Vehicle program that would interconnect throughout the City in a similar manner. The seven proposed Villages are designed to have their own neighboring commercial center intended to serve the basic needs of surrounding residents.

In recognition of the economic and market advantages those locations can provide, commercial and retail uses that sell the larger purchase items would be located along the proposed realignment of State Highway 65.

Policy LU-15.1 requires that before a Village can be developed, the City will require the development of a specific plan for the entire Village. Such specific plans will be based upon the land use mix set forth in Table 4-5, as well as implementing the land use policies of the Draft 2050 General Plan identified above. The details of implementing the Village concepts will be developed through the specific plan process. The same requirement in terms of requiring the development of a specific plan will also be applied to the Special Use Districts. This process will allow the City to obtain additional information regarding the specific aspects of each land area and make informed decisions regarding land use placement. Please refer to Master Responses #1, #2, #3, #5, #6, #7, and #8.

**Response to Comment V-3:** This comment discusses the processing of the Draft 2050 General Plan and states that the City is trying to force the general plan before adequate public comments were solicited. The City had a broad and well-documented process. There were many opportunities for the public to comment. The City began its update of the existing general plan in 2002 and held a series of thirteen public workshops with the General Plan Steering Committee during which public comments were received. Following the Steering Committee's recommendation of a Draft 2050 General Plan, the City held a series of three public joint workshops with the City's Planning Commission and City Council during which public comments were also received. These joint hearings were also placed on the City's public access channel to help inform the public of the City's progress on the General Plan. The City has also conducted several public presentations of the Draft 2050 General Plan update to various groups within the community and surrounding area, including the Del Webb community, Municipal Advisory Councils, and various clubs. The City held six formal joint public hearings with the Planning Commission and City Council during which public testimony was taken. The City circulated the Draft EIR for 45 days. The Draft EIR and the Recirculated Draft EIR were available to any member of the general public. For a summary of the General Plan's processing please refer to Chapter 1 of the Final EIR, Tables 1-3 and Table 1-4.

**Response to Comment V-4:** Commenter states that the financial model used for the Draft EIR identifies a projected need of 120,000 to 130,000 residents to enable the City to achieve a "financial self-sustaining community;" however no alternative fiscal models were used by the City in its evaluation. There are no alternative financial models identified that would satisfy project goals while reducing environmental impacts.

The fiscal analysis is not the cause of growth in the City of Lincoln or Placer County for that matter. The State of California continues to grow at a significant level on an annual basis. In particular, the Sacramento Region is one of the State's more significant areas of growth. Through SACOG's Blueprint Project, Stephen Levy, Director of the Center for the Continuing Study of the California Economy, developed a 50-year projection for both job and population growth for SACOG's six county region. That analysis indicated that over a million new jobs would be generated by the year 2050 along with a projected population growth of approximately 1.7

million. Of this total, Placer County is anticipated to attract approximately 269,000 of the new jobs and have a need for approximately 158,000 new dwelling units within that timeframe. The City's proposed expansion is within the context of this projected level of growth over the next 50 years. As part of the Draft 2050 General Plan update, the City has evaluated what is an appropriate level of this new growth to accommodate within the context of its goals and objectives for the City. The Draft 2050 General Plan, as currently proposed, assumes that the City would accommodate approximately 22% of the anticipated population growth.

The fiscal structure that is used to analyze the factors (sales tax, property tax, etc.) that would support the concept of a financially self-sustaining community are established by the State laws that regulate the generation and distribution of such funds. The financial model, used accurately, represents these conditions and the expenditures associated with achieving appropriate service levels. Chapter 10 "Alternatives to the Proposed Project" of the Draft EIR analyzes six alternatives representing a range of project conditions, summarized in Table 10-2 on page 10-6. Alternatives 1 through 4 provide a reduced environmental impact to the City for some environmental resource topics; however, they do not support a financially self-sustaining community. Alternatives 5 and 6, while proposing sufficient units to be financially self-sustaining and potentially reducing the environmental impact, do not meet other basic project objectives, as defined in Chapter 2 of the Draft EIR.

While there is no CEQA requirement to provide a fiscal analysis, the City conducted a "Fiscal Benchmarking Analysis" (Draft EIR, Appendix D) that compared the various revenue sources used to fund City services on a per capita basis relative to other California cities. While property, business, and other special taxes contributed to each city's revenue stream, all of the cities in this analysis relied heavily on sales tax revenue to meet the desired levels of services to their residents, particularly as a result of changes to California local government finance policies over the past 40 years.

The Fiscal Benchmarking Analysis showed that a higher level of population was necessary to provide market support for the full range of retail services (e.g., neighborhood, community, and regional retail) in the local jurisdictions surveyed. This diversified retail base would provide the City an increase in sales tax revenue that would support a higher level of municipal services for its residents.

The Draft EIR qualitatively assessed the potential fiscal effects between the Proposed Project and Alternative 6 "California Fish and Game" with regards to housing markets and housing absorption. The Draft EIR on page 10-66 states "The quantity of MDR units proposed under Alternative 6 provided little market diversification. Presently, Lincoln is an untested market for a large percentage of medium density housing as suggested under Alternative 6." Further on that page, the Draft EIR states "Lower density SFR homes are more likely to be absorbed at a faster rate than higher density attached units." The Draft EIR on page 10-67 states that "The lack of diversity of housing types under Alternative 6 will result in slower housing absorption. Absorption of MDR units will be much slower due to the smaller market potential for this product type, as noted above. Based on this slower absorption, it would be difficult for the City to become economically sustainable with the Proposed Project's time frame."

In addition to the qualitative assessment in the Draft EIR, to respond to the comment regarding the financial affects of the alternatives, the City's fiscal consultant analyzed the fiscal implications and potential market for residential housing of the six alternatives in the Draft EIR. The analysis entitled "General Plan Alternatives Fiscal Analysis" dated November 13, 2007 prepared by EPS is provided as Appendix A in this Final EIR. The findings of this report support and are consistent with the qualitative assessment in the Draft EIR.

For the City to meet its objectives of increasing the jobs-to-housing balance, attracting targeted business, and providing for a financially self-sustaining community, the City identified a population goal of 130,000 by 2050. This population goal was based on a long-term desire for increased levels of services and an established long-term growth plan associated with regional planning related to the Sacramento Area Council of Governments Blueprint. Please refer to Master Response #8.

**Response to Comment V-5:** The comment contains several questions regarding the growth trends for the region and the population projections used. Housing data relative to the City's Draft 2050 General Plan can be found in its recently adopted Housing Element. The Housing Element is required to be updated on a schedule mandated by the State of California, which requires that element to be updated ahead of the General Plan update. That document was adopted by the City Council on November 25, 2003 and certified by the State Department of Housing and Community Development. The Housing Element is available at City Hall and on the City's web page.

In terms of the region's growth trends, the City of Lincoln participates in SACOG, the regional planning agency for the six county Sacramento Region. As noted in the Goals and Policy Report at page 2-5, SACOG with the participation of its member jurisdictions has undertaken a comprehensive examination of the regional land use patterns and growth over the next 50 years. Part of this effort included a 50 year projection of both job and residential growth in the Sacramento Region that is referred to as the Blueprint Transportation Land Use Study. That analysis of both the economic and demographic trends for the region was conducted by Stephen Levy, Director of the Center for the Continuing Study of the California Economy. That work determined that by the year 2050 there would be an estimated 1.7 million new residents added to the Sacramento Region and approximately 1.1 million new jobs. The growth from the analysis was subsequently broken down to a jurisdictional level with Placer County expected to receive 269,000 new jobs and require approximately 158,000 new dwelling units over the 50 year period. The Draft 2050 General Plan was developed using information presented in the Blueprint Study as a basis to understand future growth trends and to help understand what level of growth the City would be able to accommodate as part of its planning effort. As the Draft 2050 General Plan is currently proposed, the City would accommodate approximately 22% of the anticipated population growth in the County. For additional information, please refer to Master Response #8.

**Response to Comment V-6:** Commenter poses a question about what the means of transportation will be 50 years in the future. The Draft 2050 General Plan is based on SACOG's Blueprint, which is a transportation plan. The Draft 2050 General Plan anticipates the means of transportation will be comprised primarily of the systems currently employed, including a

combination of automobiles, public transportation, bicycles, and pedestrian systems. The Draft 2050 General Plan within its Village Concept looks to implement the basic smart growth principles of land use design that will provide for transportation choices and an integrated system for autos, bicycles, and pedestrian pathways. The Proposed Plan also looks to encourage the use of Neighborhood Electric Vehicles by designing a roadway network that will allow their use throughout the City as an alternative to standard gas powered vehicles. Please refer to Master Response #5.

**Response to Comment V-7:** Commenter states that the DEIR fails to provide adequate analysis of impacts to wetlands by failing to note where critical wetlands are located and the types of impacts that the impervious cover will have on flows into these wetlands. A summary of the biological resources in the Planning Area is found on page 7-8 of the Draft EIR. Additionally, vernal pool wetland habitats that occur in the Planning Area are discussed on pages 7-58 and 7-59 of the Background Report (Draft EIR, Appendix B). Figure 7-8 in the Background Report identifies (at a programmatic level) where wetlands occur throughout the Planning Area. Additionally, the City recirculated the “Biological Resources” section of the General Plan Background Report as part of the Recirculated Draft EIR (see pages 2.2-3 to 2.2-49) for the Draft 2050 General Plan update. The updated “Biological Resources” section includes current regulatory information specific to local resource conditions and current habitat mapping data provided through the County’s conservation planning efforts.

Impacts to vernal pool habitats and species associated with vernal pools are discussed under Impact OSC-3, OSC-4, and OSC-5 pages 7-11 through 7-16 of the Draft EIR. A site specific analysis of impacts related to flow from impervious surfaces into specific wetlands would require additional site-specific data and project-specific analysis. This program EIR analyzes the broad implications of the Proposed Project. Development within the Villages or the Special Use Districts will require the approval of a future Specific Plan. Any specific environmental issues related to drainage would be analyzed during this review at the project level. Please refer to Master Response #2 and the responses prepared for Comments A-14, A-15, YYY-1a, and YYY-1b.

**Response to Comment V-8:** Commenter asks what the percentage increase of the City’s sphere of influence would be under the Draft 2050 General Plan and where the important farm lands are. The Draft 2050 General Plan would increase the City sphere of influence by approximately 55%. The location of Important Farmlands within the proposed boundaries are shown in Figure 7-5 of the Background Report on Page 7-27 (Draft EIR, Appendix B).

**Response to Comment V-9:** Commenter requests that the environmental document identify or map the farmlands that are expected to be destroyed or maintained. Maps of important farmland and agricultural resources currently found within the Planning Area are provided in the Background Report (see Figures 7-4 and 7-5) (Draft EIR, Appendix B). It is anticipated that agricultural lands within the Proposed Project boundaries will be converted to non-agricultural uses over the course of the 2050 planning horizon. Agricultural lands outside the Proposed Project boundaries are anticipated to remain operational in accordance with the County of Placer’s land use regulations. Future projects may require additional project-level analysis, which

will be required to specify the actual number of acres of converted farmland and identify any feasible mitigation measures designed to address the impact. Further, Chapter 4.0 "Land Use" of the Recirculated Draft EIR corrected Table 4-21 Important Farmlands Converted by the Proposed Project. Please refer to Master Response #2. Also, please refer to response to Comments V-11 and V-12.

**Response to Comment V-10:** Commenter would like to know which important landscape features, such as 100-year floodplains, Prime Farmland, sensitive and protected species, and high value habitat, are to be avoided by future development. Commenter suggests creating a map to show the specific development plan and conservation strategy for the larger regional interest. Development of the Draft 2050 General Plan, Draft Land Use and Circulation Diagram, and Draft and Final EIRs have taken into consideration each of the important landscape features Commenter identifies. As more fully described in Chapter 1 of this Final EIR, the General Plan Background Report is a part of the Draft EIR and is attached as Appendix B. The Background Report serves as the setting and baseline information for the Proposed Project and contains figures showing the locations of these landscape features. Figure 8-4 on page 8-41 of the Background Report shows 100-year floodplains within the Planning Area. Figure 7-5 on page 7-27 of the Background Report shows important farmland within the Planning Area. A list of special status species with the potential to occur in the Planning Area is found in Table 7-10 starting on page 7-60.

Additionally, the City recirculated the "Biological Resources" section of the General Plan Background Report as part of the Recirculated Draft EIR (see pages 2.2-3 to 2.2-49) for the Draft 2050 General Plan update. The updated "Biological Resources" section includes current regulatory information specific to local resource conditions and current habitat mapping data provided through the County's conservation planning efforts. Additionally, impacts relating to these landscape features are addressed throughout the Draft EIR (see Chapters 4, 6, and 7). Where the EIR identifies impacts relating to these features, the EIR also identifies corresponding Draft 2050 General Plan policies that mitigate those impacts. Where the EIR found insufficient mitigating policies of the Draft 2050 General Plan, new policies were included to mitigate the impact to the extent feasible. In terms of the other noted landscape features, the Draft 2050 General Plan contains policies designed to protect floodplains (Policy OSC-1.4 and Policy PFS-4.9) as well as natural resources and habitat areas (Policy OSC-1.1, Policy OSC-1.2, and Policies OSC-5.1 through 5.11).

**Response to Comment V-11:** Commenter would like to know how much important and prime farmland exists within the Proposed Project Planning Area. A summary of agricultural resources is provided on page 4-2 of the Draft EIR. A full discussion of agricultural resources within the Planning Area is included in Section 7.6 of the Background Report (Draft EIR, Appendix B). Total important and prime farmland acreage is presented in Table 7-6 on page 7-24 and shown in Figure 7-5 on page 7-27 of the Background Report. Also, please refer to the response provided for Comment V-10.

**Response to Comment V-12:** Commenter notes discrepancies between the numbers and percentages of “important farmland” on pages 4-2 of the DEIR, the NOP, and page 4-24 of the DEIR. The acreage numbers for farmland type presented in the NOP (Draft EIR, Appendix A) was a preliminary estimate of the potential impacts to farmland within the Study Area. A more substantive analysis of the impacts to farmland was conducted for the Draft EIR and is presented under Impact LU-4 on page 4-24 of the Draft EIR. As stated in the Impact Methodology on page 4-17, to obtain the amount of important and prime farmland that will potentially be impacted by the Proposed Project, GIS data from the California Department of Conservation’s Farmland Mapping and Monitoring Program was combined with a GIS layer of all developed uses within the proposed boundaries of the Planning Area. In response to this comment, the analysis of converted acreage was recalculated using the methods described above. The results of this analysis indicated a misrepresentation of the overall number of acres converted to developed uses in the Draft EIR. This change has been made and was recirculated for public review. Please refer to Section 2.1, “Land Use”, Table 4-21 of the Recirculated DEIR. Overall, the increased number of converted acres does not change the conclusion for Impact LU-4 and the impact remains significant and unavoidable.

Commenter also questions where the map is that indicates where the California Department of Conversation – FMMP 2002 soils is located. The requested information is contained in the Background Report at pages 7-19 through 7-33, and Figure 7-5 on page 7-27 of the Background Report is a map depicting important farmlands within the Planning Area.

**Response to Comment V-13:** Commenter questions if there are specific ways to support neighboring farms. The City’s primary approach to supporting neighboring farms is to design a system of buffers between urbanized areas and areas that will remain in the County as agricultural operations. Proposed policies address this issue:

- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*
- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use Element Policy 4.29]*

The specific details of the buffer system will be established during the review and approval of specific plans for each of the proposed Villages, which is required prior to development within the Village areas.

The City will also address this issue through the use of disclosures regarding operations, as specified in other policies:

- **Policy OSC-2.2 Agricultural Disclosures.** The City will require that developers of residential projects, which are within general proximity of agricultural operations in the County, provide notification to new homeowners within their deeds, of the County's right to farm ordinance. *[New Policy]*
- **Policy LU-5.5 Agricultural Disclosure.** Residential developments locating next to active agricultural areas will have a notice included in the deed notifying buyers of the agricultural use. *[New Policy]*

For those agricultural operations which reside within the proposed sphere of influence boundaries while land is gradually transitioning into the City, the use of disclosure and notification of the County's right to farm ordinance will be provided to landowners that adjoin such areas.

Impacts LU-4 and LU-5 (see pages 4-25 and 4-26) address conflicts between agricultural and urban land uses and the potential result in loss of farmland. These impacts identify mitigating policies of the Draft 2050 General Plan that require the development of buffers between agricultural and urban uses and to protect existing agricultural operations through zoning and development review processes:

- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use Element Policy 4.29]*
- **Policy LU-9.6 Maintain Urban Edge.** The City shall maintain a distinct urban edge, while creating a gradual transition between urban uses and open space. *[New Policy]*
- **Policy OSC-2.1 Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*

Additionally, Open Space and Conservation Implementation Measure #7 requires the City to adopt a right-to-farm ordinance that would protect agricultural operations immediately adjacent to the City from complaints from new development. Draft 2050 General Plan policies OSC-2.2 and LU-5.5 require agricultural disclosures that notify home buyers of adjacent agricultural operations. Additionally, Impact LU-4 proposes an additional mitigation measure in the form of a new policy, OSC-2.3. This policy states, "The City shall support policies adopted by neighboring cities and Placer County to promote the viability of agriculture in the county."

**Response to Comment V-14:** Commenter questions the viability of Policy OSC-2.3, to support neighboring farms on County lands, when the current General Plan intends to develop such a vast extent. Policy OSC-2.3 states, "The City shall support policies adopted by neighboring cities and Placer County to promote the viability of agriculture in the county." Policy OSC-2.3 is reflective of the City's efforts to work with Placer County in the establishment of the Placer County Conservation Plan (PCCP). As currently drafted, the proposed PCCP endeavors to establish not

only areas of potential preservation and restoration of critical habitat, but also protection of agricultural operations. To that end, the plan would try to establish limits on urbanization and recognize areas that are intended to remain as agricultural. The policy reflects the City's interest in cooperating with other jurisdictions in the efforts of the PCCP. Further, the issue of agricultural conversion is analyzed, in Impact LU-4, in the Draft EIR.

Commenter also wonders if most of the western part of Placer County outside of the Draft 2050 General Plan and floodplain is suitable to farming and asks what kind of farming this area is suitable for. In terms of the nature of agricultural operations outside the City's proposed boundaries, they are essentially the same as those occurring to the east on the valley flood. There is no significant distinction in soil types between these areas. Many agricultural operations occur within floodplains.

**Response to Comment V-15:** Commenter states that the DEIR needs a map that shows GIS layers that have FMMP important and prime farmlands, existing crops, Williamson Act Lands, 100 year flood plain and stream system, and an overlay of subdivision/commercial development. Figure 7-5 on page 7-27 of the Background Report (Draft EIR, Appendix B) shows FMMP important and prime farmland within the Planning Area. Agricultural resources, including crop types, within the Planning Area are shown on Figure 7-4 on page 7-25 of the Background Report. Williamson Act Lands within the Planning Area are shown on Figure 7-6 on page 7-30 of the Background Report. Floodplains are shown on Figure 8-4 on page 8-41. Primary waterways within the Planning Area are shown on Figure 6-11 on page 6-55. Impacts to farmlands are set forth in the Draft EIR, see Impact Analysis LU-4. Please also refer to the response developed for Comment V-10.

**Response to Comment V-16:** Commenter states that the public needs to understand the zoning impact of the City's Draft 2050 General Plan with respect to the Placer County General Plan because the Draft 2050 General Plan would change current Placer County designations to higher dwelling unit densities. Along these same lines, Commenter questions whether the Draft 2050 General Plan is consistent with Placer County's General Plan. The significance criteria used for the analysis of land use impacts were developed from criteria presented in Appendix G of the CEQA Guidelines. The impact analysis based on these significance criteria is found under Impacts LU-1 and LU-2 on pages 4-18 through 4-23 of the Draft EIR. Impact LU-2 (see page 4-21) states that "the Proposed Project was designed to achieve and promote consistency with the planning documents of neighboring jurisdictions and responsible agencies." See Table 4-20 for a list of relevant plans, policies, and reports from other city, county, and regional agencies that were considered in the preparation of the Draft 2050 General Plan. Included in this table is the Placer County General Plan. Despite policies in the Draft 2050 General Plan identified in this impact discussion as mitigation for conflicts with other plans or policies, the impact is potentially significant. The impact proposes two additional mitigation measures, Policy LU-7.2 "City/County Uniform Land Use Policy" and Policy LU-7.3 "Regional Planning" (see page 4-23), as follows:

- **Policy LU-7.2 City/County Uniform Land Use Policy.** The City shall work with Placer County to develop a process for coordination of land uses for areas within the City's future sphere of influence. *[New Policy – Draft EIR]*
- **Policy LU-7.3 Regional Planning.** The City shall continue to participate in the Sacramento Area Council of Governments' regional planning programs and shall coordinate City plans and programs with those of the Council of Governments. *[New Policy – Draft EIR]*

The impact remains significant due to conflicts with local and regional air quality plans.

**Response to Comment V-17:** Commenter states that the Draft EIR fails to fully analyze the cumulative growth-inducing impacts that the City's Draft 2050 General Plan would have in the region, by not addressing regional growth expectations. Growth inducing effects of the Proposed Project are identified on pages 11-1 through 11-4 of the Draft EIR. The analysis of growth inducing effects states that "the goals and policies of the Draft 2050 General Plan are designed to address the challenges of accommodating and managing growth, while balancing the positive and negative consequences in a manner that results in the overall benefit to the community." For example, Goal LU-1 is, "To grow in orderly pattern consistent with the economic, social, and environmental needs of Lincoln," and has fourteen policies to implement that goal. The analysis comes to the conclusion that impacts from direct induced growth are less-than-significant with implementation of policies of the Draft 2050 General Plan. Due to specific policies that limit growth to the City limits and the Sphere of Influence and ensure the provision of public services and utilities to development within the proposed Sphere of Influence, indirect growth inducing impacts were determined to be less-than-significant.

Commenter also asks about the growth-inducing impacts of Village 3, 4, and 6. The analysis looked at the implications of all the villages including 3, 4, and 6 and came to the conclusion that growth inducing impacts would be less than significant with implementation of the General Plan policies. In addition, south of Village 6 is the location of the northern portion of Placer County's approved Sunset Industrial Park area, which will represent an extension of planned urban growth in the area. Please refer to Master Response # 8, which addresses regional growth issues.

**Response to Comment V-18:** Commenter makes lengthy comments about the purported inconsistency between the Draft 2050 General Plan and the Placer County Conservation Plan (PCCP). Commenter states, among other things, that the Draft 2050 General Plan does not address the preservation of large areas noted in the PCCP for the retention of vernal complexes and that the Draft EIR conflicts with the PCCP strategy by planning development of Villages and SUDs over areas already designated by the PCCP as Conservation Management Units. The Placer County Conservation Plan is in draft form, and no specific strategy for implementation has been adopted. However, Lincoln is participating in the development and preparation of the PCCP and is working to coordinate its planning efforts with those of the conservation plan. Additionally, as of the date of this Final EIR, it is unclear when the documents pertaining to the PCCP will be released for public agency review and considered for adoption. It is, thus,

speculative to assume that the Draft 2050 General Plan, or any specific portion of it, conflicts with the PCCP, as it has not yet been adopted.

Further, the Draft EIR analyzes the impact of a potential conflict with an applicable habitat conservation plan or natural community conservation plan. Impact LU-3 on pages 4-23 and 4-24 of the Draft EIR states that while there is currently no habitat conservation plan or natural community conservation plan in place that covers the area, Placer County is in the process of developing the PCCP. Impact LU-3 also notes that policies in the Draft 2050 General Plan were designed to promote consistency with other neighboring agencies' planning documents and that the Open Space and Conservation Element of the Draft 2050 General Plan contains a number of policies that require the City to participate in the continued development of the natural resource objectives that will form the basis of the PCCP. With implementation of such policies, the Draft EIR concludes that this impact is less than significant. These policies and Implementation Measures require the City to continue to participate in the development of natural resource objectives that will form the basis of the PCCP, as follows:

- **Policy OSC-1.2 Coordinate with Placer County for Open Space Preservation.** The City shall coordinate with Placer County and their Placer Legacy program to ensure City issues are incorporated into future plans. *[New Policy]*
- **Policy OSC-4.3 Protect Surface Water and Groundwater.** The City shall ensure that new development projects do not degrade surface water and groundwater. *[New Policy]*
- **Policy OSC-5.3 Placer County Open Space and Conservation Program.** The City will continue to coordinate with Placer County and the Placer Legacy Open Space and Conservation Program to protect habitat areas that support endangered species and other special-status species. *[New Policy]*
- **Implementation Measure 1.0.** The City shall adopt specific criteria for the protection of natural and cultural resources as part of the City's environmental review process. This will include standards for determining environmental significance.
- **Implementation Measure 2.0.** The City shall investigate the establishment of a land trust for open space lands and consider opportunities for acquiring natural habitat and agricultural areas for permanent open space and natural parks.
- **Implementation Measure 3.0.** The City shall establish a mitigation fee for habitat preservation and replacement. Within the Village Areas, the inclusion of the 40 percent open space could provide adequate mitigation for habitat.

Open Space and Conservation Implementation Measures #1.0 – 3.0 require actions supporting preservation and conservation of a variety of natural resources that may be protected by the PCCP. The City is also proposing the following additional policy that was developed during preparation of the Draft EIR:

- **Policy OSC-5.13 Appropriate Mitigation Measures.** The City shall consider using appropriate mitigation measures for future projects (i.e., specific plans or individual projects) based on mitigation standards or protocols adopted by the applicable statute or agency (e.g., USFWS, CDFG, etc.) with jurisdiction over any affected sensitive habitats or special status species. *[New Policy – Draft EIR Analysis]*

Policy OSC-5.12 demonstrates the City's intent to coordinate with other applicable agencies concerning biological resources and development of mitigation measures. Please also refer to the responses prepared for Comments A-15, YYY-1a, YYY-1b.

**Response to Comment V-19:** Commenter states that the Draft EIR fails to fully analyze impacts to wildlife habitat and anadromous fish and fails to provide feasible mitigation for impacts. Utilizing data obtained from Placer County, a map was created to show which habitats are located in the Planning Area and where they are located (see page 7-56). Additionally, the Draft 2050 General Plan Goals and Policies Report is considered one of the key documents used in preparing the Draft EIR and is included as an appendix (Appendix C) to the Draft EIR. This document contains policies that highlight coordination with the County's PCCP and working with federal regulations to address impacts to endangered and other special status species:

- **Policy OSC-1.2 Coordinate with Placer County for Open Space Preservation** The City shall coordinate with Placer County and their Placer County Legacy program to ensure City issues are incorporated into future issues. *[New Policy]*
- **Policy OSC-5.3 Placer County Open space and Conservation Program.** The City will continue to coordinate with Placer County and the Placer Legacy Open Space and Conservation Program to protect habitat areas that support endangered species and other special-status species. *[New Policy]*

In addition to the information provided in the Draft EIR, the City recirculated the background report specific to biological resource issues. Refer back to the responses to comments A-2 and V-16.

Commenter would like to know if the City worked with wildlife agencies to minimize impacts. In developing the Background Report (attached to the Draft EIR as Appendix B), wildlife agencies' resources were utilized to determine what plant communities and special status species may potentially occur in the Planning Area (please see Table 7-8 on page 7-55 and Table 7-10 starting on page 7-60).

Commenter inquires about growth inducing impacts and where buffers will be located. Impacts related to growth are identified in Chapter 11 on pages 11-1 through 11-4 of the Draft EIR (please also refer to the response prepared for Comment V-17). As explained in the response to comment A-2, buffer areas have not yet been identified. However, the Draft 2050 General Plan identifies several policies that will be utilized in specific plans prepared for Village and SUD areas that promote the use of buffers to protect sensitive biological resources (see Policies OSC-1.3 and

LU-1.4). Due to the programmatic nature of this EIR, site-specific impacts and mitigation measures are not required. Please refer to Master Response #2.

Commenter also inquires about how conservation and preservation efforts are going to be funded. Impacts OSC-3, OSC-4, OSC-6, and OSC-8 identify Open Space and Conservation Implementation Measure #3 as a mitigating measure of the General Plan, which states that the City shall establish a mitigation fee for habitat preservation and replacement (see pages 7-11 through 7-19).

Further, maintenance of open space areas can be funded through a variety of City programs.

**Response to Comment V-20:** Commenter identifies the potential for the Lower Coon Conservation Management Unit (CMU) to be located within SUD-A. Commenter requests that impacts to this CMU from development of SUD-A be determined. The area north of Wise Road between SR65 and Dowd Road is the northern portion of SUD-A, which encompasses approximately 620 acres. Of these 620 acres, 470 acres consist of either floodplain/open space or airport overflight easement uses. The remaining acres, which are adjacent to Wise Road and/or SR65, are potentially classified as Business Professional or Industrial land uses consistent with the ALUC. As noted in response to Comment V-18 the PCCP has not been approved. Impacts from the Proposed Project to special status species and sensitive habitats were evaluated for the entire Planning Area, which includes a small portion of the area identified as Lower Coon CMU and were determined to be significant and unavoidable in the Draft EIR (see Impacts OSC-3 through OSC-7 on pages 7-11 through 7-18). Future development proposed for areas that have the potential to contain high value habitat will be required to work with the City, pursuant to State and Federal regulations, to preserve those areas or develop mitigation for impacts to resources within those areas. The intent of a programmatic EIR is to analyze the broad implications of the Proposed Project. As previously stated, as specific plans are prepared for Village and SUD areas additional project specific environmental analysis will be conducted. Please refer to Master Responses #2 and #6.

**Response to Comment V-21:** Commenter asks a number of questions. Commenter asks about the history of seagoing fish in Coon Creek. As noted in the Draft EIR, there is a potential for seagoing fish to occur in the Coon Creek.

Commenter asks about cumulative impacts, in terms of the likely impacts of Teichert's new operations and the Draft 2050 General Plan on the Coon Creek stream system and in terms of how the cumulative impacts of current projects are going to affect the availability of mitigation lands. Discussion of cumulative impacts from the Proposed Project and other projects in the vicinity is found in Chapter 11 on pages 11-4 through 11-19 of the Draft EIR. Future projects under the Draft 2050 General Plan would be required, through site-specific analysis, to analyze impacts to biological resources and develop mitigation measures relative to the scope of the project. Depending on the project-specific details and according to regulatory requirements, mitigation of the impacts may be achieved on the project site, off-site, or through payment of mitigation fees. However, due to the programmatic nature of this EIR, site-specific impact analysis and mitigation is not feasible. Please refer to Master Response #2.

Regarding the question of how cumulative impacts of other currently proposed projects are going to limit the availability of mitigation lands, it is unclear at this stage to what extent such projects will impact resources. Several of the listed projects have not received approvals and are in various stages of planning. At the time that all future projects associated with the City's Draft 2050 General Plan move forward, they will be required to address mitigation of impacts and to evaluate cumulative conditions that are present and known at that point in time. It has not been demonstrated that there is a shortage of mitigation lands; that is dependent upon a variety of factors associated with the 404 permitting process. If the Placer County Conservation Plan is adopted, it is likely that regional mitigation measures will be addressed through that conservation plan.

Commenter states that if a take of fish is going to occur, land habitat lands must be protected outside of the sphere of influence but within the County. As previously identified, the Proposed Project analyzed in this Draft EIR is a general plan update and is evaluated at a programmatic level with no specific development at this point in time. As also noted previously, this Draft EIR is a first-tier environmental document and will serve as a basis for subsequent environmental review of specific plans, infrastructure improvements, and other local development proposals.

**Response to Comment V-22:** Commenter states that the Draft EIR fails to provide adequate mitigation for impacts to endangered species and fails to account for the fact that federally designated critical habitat is planned for urban development. Commenter is not specific as to the purported inadequacy and does not provide any examples. Commenter is similarly vague in asking how the City will address the Fish and Wildlife Service Federal Register of Critical Habitat Unit 11, located north and east of the city center. Please refer to the response prepared for Comment V-20. Critical habitat areas within Placer County are addressed on pages 2.2-45 and 2.2-46 of the Recirculated Draft EIR, with potential impacts to these areas described on page 2.2-56 of the Recirculated Draft EIR. As indicated on page 2.2-56, potential impacts to areas defined as Critical Habitat would require review by USFWS and an analysis of the functions and values of these areas. Additionally, if impacts to these areas were authorized, an avoidance and compensation plan would have to be approved by USFWS to ensure the continued existence of the affected specific. Consistent with this approach, future development proposed for the Planning Area that has the potential to contain high value habitat will be required to work with the City, pursuant to State and Federal regulations, to preserve those areas or develop mitigation for impacts to resources within those areas. The intent of this program-level EIR for the Draft 2050 General Plan is to analyze the broad implications of the Proposed Project. As previously stated, as specific plans are developed for Village areas, additional project specific environmental analysis may be required.

**Response to Comment V-23:** Commenter states that Lincoln must address the cumulative impacts on grasslands and seasonal wetlands, and questions how Lincoln has addressed these specific concerns as a participant of the PCCP. This comment primarily concerns the PCCP, which as noted in the response to comment prepared for Comment V-18, the City is a participant in; but the PCCP has not been adopted yet. Additionally, cumulative impacts to biological resources are discussed in Chapter 11 on page 11-8 of the Draft EIR. The analysis determined that even after implementation of Draft 2050 General Plan policies intended to mitigate impacts

to biological resources and after implementation of mitigation determined at the project-specific level based on state and federal regulations, cumulative impacts to biological resources are significant and unavoidable.

Commenter also references a letter sent to Loren Clark dated June of 2005, but this letter was not submitted as part of a comment letter on the Draft or Recirculated Draft EIR. However, it appears that an excerpted portion of the letter was part of a larger letter sent to the County regarding the draft PCCP. With respect to the Draft 2050 General Plan EIR, the Draft and Recirculated Draft EIR identify cumulative impacts to vernal pools, and the City is an active participant in the PCCP process.

**Response to Comment V-24:** Commenter states that the Draft EIR must mitigate for impacts to the Vernal Pool Recovery Core Areas in a manner consistent with the Vernal Pool Recovery Plan habitat protection requirements and that within the core areas, 85% of the vernal pool habitat is to be protected. Impacts to specific habitat types, including wetlands and vernal pools are discussed in the Recirculated Draft EIR. Impact OSC-5 states that the project would have a substantial adverse effect on federal protected wetlands, including vernal pools. While there are policies (OSC-1.1, OSC-4.1, OSC-5.1, OSC-5.2, and OSC-5.5 through OSC-5.9), that will mitigate the impact to some degree, the impact is significant and unavoidable.

**Response to Comment V-25:** Commenter states that the Draft EIR does not reveal all of the mitigation that will be needed to minimize impacts to wetlands and endangered species. For example, Commenter states that the development projects under the Draft 2050 General Plan will require wetlands permits under section 404 of the Clean Water Act, a biological opinion under section 7 from USFWS, and an approved take permit. As discussed above, the City will consider appropriate mitigation measures for specific projects pursuant to Policy OSC-5.12, as follows:

- **Policy OSC-5.12 Appropriate Mitigation Measures.** The City shall consider using appropriate mitigation measures for future projects (i.e., specific plans or individual projects) based on mitigation standards or protocols adopted by the applicable statute or agency (e.g., USFWS, CDFG, etc.) with jurisdiction over any affected sensitive habitats or special status species. [*New Policy – Draft EIR Analysis*]

In addition, the City will obtain all required state and federal permits prior to proceeding.

### ***Letter W. United Auburn Indian Community***

**Response to Comment W-1:** Commenter states that the Draft EIR adequately addresses its concerns regarding impacts to archaeologically or culturally significant sites due to potential development of ancestral territory for the City's 2050 General Plan Update. No specific response is necessary.

## **Individuals**

### ***Letter X. James Bean***

**Response to Comment X-1:** Commenter states that the Draft EIR did not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please see Master Response #5.

### ***Letter Y. Kelly Bess, Resident***

**Response to Comment Y-1:** Commenter requests to have Village 5 included within the proposed Sphere of Influence for the City's Updated General Plan. Please see Master Response #1 and Master Response #3.

### ***Letter Z. Warren Bostick, Resident***

**Response to Comment Z-1:** Commenter states that he did not find any information on current or past history of water run-off from the City "footprint" and does not believe that the Draft EIR realistically measures the downstream impact of further construction. Stream Gage Records for flooding events are currently not kept within or near the City of Lincoln, except for a single Gage in "Doty Ravine," with some historical High water marks at bridges, such as Fowler Bridge. Current models have been calibrated for these measurements. However, the impact of pre- to post- development conditions cannot be determined until peak flow stream gage measuring devices are installed. The City hopes to install these devices at Auburn Ravine, Markham Ravine (downstream of the City), and at Coon Creek in the near future. The City does have two events of historical records for comparison. The 1997 event, which resulted in water overtopping SR-65 at Auburn Ravine and flooding of the adjacent structure, was estimated to be similar in rainfall to the New Years Eve event of 2005/2006, roughly a 10-year event. In the more recent 2005/2006 event, overtopping of SR-65 at Auburn Ravine nearly occurred but was avoided. These events conform to the models, which indicate that before the Ferrari area was excavated north of Ferrari Ranch Road, flooding of SR-65 would occur; but after installation of this additional flood volume, flooding of SR-65 would not occur for a 10-year event. These events have been interpreted by the City's hydrology consultant as evidence that the detention mitigation for development flows may be slightly improving flood conditions for the stream near Lincoln.

### ***Letter AA. Brenda Bowcut, Resident***

**Response to Comment AA-1:** Commenter notes that Lincoln has adequate amenities and services already in place. No specific response is required.

### ***Letter BB. Mike and Patricia Carlson, Residents***

**Response to Comment BB-1:** Commenter suggests that Draft EIR and slow housing market should be used to preserve as much open space as possible with specific mention made of Highway 193. The City's General Plan policies call for the provision of 40% open space within each specific plan area. The guidelines set forth in the Goals and Policies Report of the Draft

General Plan at page 4-26 regarding the design of the Village 1 specific plan call for the retention of the scenic corridor along Highway 193. Refer to Master Response #1 and #6.

**Response to Comment BB-2:** Commenter suggests the promotion of the Neighborhood Electric Vehicle Transportation Plan over increased industrial or commercial zones. Please see Master Response #5.

**Response to Comment BB-3:** Commenter suggests the construction of bridges over the train tracks could eliminate the need for train horn blowing. Trains use of their horns is regulated by the California Public Utility Commission and Federal legislation. Separate from the General Plan Update process, the City is evaluating the feasibility of alternative warning methods for at grade crossings as a potential means of reducing noise from train horns.

***Letter CC. Dori Childress, Resident***

**Response to Comment CC-1:** Commenter does not agree regarding the expansion of Lincoln's population to 132,000. The comment is noted. No specific response is required

**Response to Comment CC-2:** Commenter notes concern regarding the expansion of Lincoln into the rural North and East. Please see responses to Comment H-1 and I-4 regarding the proposed planning boundaries.

**Response to Comment CC-3:** Commenter states opposition to the population growth proposed in the Draft 2050 General Plan and asks that it be reconsidered. No specific response is necessary. Commenter also asks that buffers be provided between urban development and rural ranches. The Proposed Project does provide for the use of buffers to avoid land use conflicts and help agricultural activities, see Policy LU-5.4 and response to Comment A-2.

***Letter DD. Michael Devereaux, Law Offices of Gregory D. Thatch***

**Response to Comment DD-1:** Commenter suggests that the correct acreage for the Village 7 specific plan is 698 +/- acres and the Nader Ranch property includes 516 +/- acres. It is anticipated that as specific plans are processed, more detailed information will be available. The Draft 2050 General Plan utilizes general information in terms of land area and is not based upon detailed survey information at this stage. Further refinements in land area and other features are anticipated to occur during the review of specific plans. Please see Master Response # 7.

**Response to Comment DD-2:** Commenter suggests that the impact described in the heading of Impact LU-6 is misprinted as it is essentially the same impact as Impact LU-4. Impact LU-4 on pages 4-24 and 4-25 of the Draft EIR identifies direct impacts to agricultural resources that include the conversion of farmland to urban or non-agricultural uses. Impact LU-6 on pages 4-26 and 4-27 of the Draft EIR discusses indirect impacts such as nuisance effects that result from urban expansion into agricultural areas. These nuisance effects may result in additional costs to the agricultural operations and rising land values that eventually may encourage the conversion of farmland to urban uses. Thus, Impact LU-4 addresses the overall net loss of farmland while

Impact LU-6 addresses the indirect impacts, such as the nuisance effects discussed above, associated with the conversion of agricultural land to non-agricultural uses.

**Response to Comment DD-3:** Commenter suggests that Tables 4-13, 4-14, ES-1, 2-3, 2-5 and 5-17 be revised to reflect the suggested land use acreages provided by Commenter. Please see response to Comment DD-1 and Master Response # 7.

**Response to Comment DD-4:** Commenter notes that the Joiner Parkway/Moore Road and SR 65/Industrial Avenue are not shown in the Tables of Chapter 5. A cul-de-sac was placed on Moore Road east of Joiner Parkway and when the SR 65 Lincoln Bypass is constructed, Moore Road will not cross SR 65. Thus, Moore Road will have limited traffic in the future, and Joiner Parkway/Moore Road becomes a minor intersection that does not need to be addressed in the Draft EIR.

The intersections of the SR 65 northbound and southbound ramps with Industrial Avenue are included in the Tables 5-19, 5-27, 5-28, 5-36 and 5-44 (of the Draft EIR) as intersection numbers 64 and 65.

**Response to Comment DD-5:** Commenter asks that the improvement called for in Mitigation Measure TC-5a be identified. There is only one intersection impacted under Impact TC-5: Foothill Boulevard and Pleasant Grove Road. TC-5a refers to the improvement listed under TC-5b.

**Response to Comment DD-6:** Commenter suggests that the City delete new mitigation measures PFS-9.9 relating to school funding from the Draft 2050 General Plan Update's Draft EIR, as state law does not require developers to dedicate school sites and pay school developer fees. The policy reads as follows:

- **Policy PFS\_9.9 School Funding.** To the extent allowed by State law, the City will require new projects to mitigate impacts on school facilities, which could occur through a combination of new school site dedications and the use of developer fees. The City will also work with school districts, developers, and the public to evaluate alternatives to funding/providing adequate school facilities. [*New Improvements – Draft EIR Analysis*]

As stated in the policy, there is an explicit acknowledgment that this policy will be implemented only to the extent permitted by state law. Please refer to Master Response #1.

**Response to Comment DD-7:** Commenter suggests revising mitigation measure OSC-6.10 to say that upon the discovery of human remains, no further excavation or disturbance shall occur within 100 feet instead of allowing no further excavation anywhere on the project site. That policy reads as follows:

- **Policy OSC-6.10 Discovery of Human Remains.** Consistent with CEQA Guidelines (Section 15064.5), if human remains are discovered during project construction, it is necessary to comply with state laws relating to prohibitions on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (California

Health and Safety Code Section 7050.5). If any human remains are discovered or recognized in any location on the project site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

- A. The Placer County Coroner/Sheriff has been informed and has determined that no investigation of the cause of death is required; and
  - 1. if the coroner determines that the remains are of Native American origin,
    - a. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.
    - b. The NAHC shall identify the person or persons it believes to be the most likely descendant (MLD) from the deceased Native American.
    - c. The MLD shall have an opportunity to make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
- B. Native American Heritage Commission was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the commission.
- C. The County has notified the United Auburn Indian Community (UAIC) Tribal Council and solicited their input. *[New Policy – Draft EIR Analysis]*

While Policy OSC-6.10 uses the term “site,” it is not intended to refer to the entire project site. The policy references further excavation on the site where the remains are found and any nearby areas reasonably suspected of overlying the human remains. The restriction regarding further excavation may be less than or greater than the 100 foot distance recommended by the comment depending upon circumstances in the field. Please refer to Master Response #1.

**Response to Comment DD-8:** Commenter states that Alternative 4, while environmentally superior, should be rejected due to its inability to meet many of the City’s Project Objectives for the Draft 2050 General Plan Update. The comment is noted. No further response is required.

**Response to Comment DD-9:** Commenter does not believe that the City has any type of building allotment regulations, as referenced in the discussion of Direct Impacts on page 11-3. Commenter is correct in stating that the City of Lincoln does not have a building allotment regulation in the sense of a formal limitation on the number of dwelling units allowed. The phrase used in the Direct Impacts analysis is not intended to convey this meaning but is only a reference back to SACOG’s estimation of the level of growth that Placer is projected to experience over the next 50 years.

***Letter EE. Jon Emerson, Resident (email)***

**Response to Comment EE-1:** Commenter expresses an opinion about the conditions of East Avenue and Nicholas Road. No specific response is required.

***Letter FF. John and Sheila Fanucchi, Residents***

**Response to Comment FF-1:** Commenter requests that specific properties be rezoned as Business Professional as a buffer to the residential area. Please see Master Response #1 and Master Response #4.

**Response to Comment FF-2:** Commenter include copies of previous letters with the letter and would appreciate it if the letters be made available to General Plan committee members and Planning Commission and City Council members. As requested, the letters by their inclusion in the Final EIR have been made available to both the Planning Commission and City Council members. Please refer to Master Response #1.

***Letter GG. Walter and Robyn Fickewirth, Residents***

**Response to Comment GG-1:** Commenter requests that specific properties be rezoned to be included in the Village 2 boundary. Please see Master Responses #1 and #4.

***Letter HH. John Fotopooloy***

**Response to Comment HH-1:** Commenter requests that specific properties be rezoned as commercial. No specific response is required. Please see Master Responses #1 and #4.

***Letter II. Tony Frayji, Frayji Design Group, Inc.***

**Response to Comment II-1:** Commenter suggests adoption of revised tables regarding the distribution of land uses for the Village 1 area. The proposed table would establish ranges of acreage for each of the land use categories and would combine Country Estates and Low Density residential land uses into a single category. Please see Master Responses #1 and #7.

**Response to Comment II-2:** Commenter suggests that the presently stated Open Space requirement of 40% should be changed to a goal. No specific response is required. Please see Master Responses #1 and #6.

***Letter JJ. Frayji Design Group, Inc.***

**Response to Comment JJ-1:** Commenter requests to have Bickford Ranch's Village-20 and two other specific parcels included within the proposed Sphere of Influence for the City's Updated General Plan. Please refer to Master Response #1 and #3.

***Letter KK. Cheryl A. Gallagher***

**Response to Comment KK-1:** Commenter states that she hopes that their area would continue to be planned for SUD commercial zoning. Please refer to Master Response #4.

**Letter LL. Peter Gilbert, Resident**

**Response to Comment LL-1:** Commenter feels that the Draft EIR did not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please see Master Response #5.

**Letter MM. Deanne M. Green, Brookfield Land**

**Response to Comment MM-1:** Commenter recommends updating the traffic model to reflect recent development changes. While the model was validated to 2004 traffic count data, the model includes the latest development assumptions prepared in 2006 through discussions with the jurisdictions in Placer County.

**Response to Comment MM-2:** Commenter notes that the extension of Dowd Road noted in mitigation measure TC-10 and other roadways proposed by other jurisdictions would fall within their land holdings. The Draft EIR assumes a generalized alignment for the extension of Dowd Road that would connect to Westside Drive in the West Roseville Specific Plan that is consistent with the generalized alignment that is also being assumed by Placer County and the City of Roseville in their on-going planning efforts. A precise alignment for this extension has not been established. The portion of the Dowd Road extension south of Sunset Boulevard West is located in unincorporated Placer County outside of the City of Lincoln's proposed Sphere of Influence.

City of Lincoln staff met with representatives of the Brookfield Land Company and will continue to have such discussions.

**Letter NN. Robert J. Guilford, Resident**

**Response to Comment NN-1:** Commenter requests that additional land be added to the proposed sphere of influence. Please refer to Master Response #1 and #3.

**Letter OO. Steve W. Hachett**

**Response to Comment OO-1:** Commenter requests that specific properties be rezoned as commercial. Please refer to Master Response #1 and #4.

**Letter PP. Debbie Haldeman, Dunmore Homes**

**Response to Comment PP-1:** Commenter requests clarification regarding the limits of grading for future development and cites Impact OSC-1.6 Soil Erosion. The City interprets the comment to refer to Policy OSC-1.6, which provides:

- **Policy OSC-1.6 Soil Erosion.** The City shall require new development to implement measures that minimize soil erosion from wind and water related to construction. Measures may include, but not be limited to the following:
  - Grading requirements that limit grading to the amount necessary to provide stable areas for structural foundations, street rights-of-way, parking facilities, or other intended uses; and/or

- Construction techniques that utilize site preparation, grading, and best management practices that provide erosion and sediment control to prevent construction-related contaminants from leaving development sites and polluting local waterways. *[New Policy]*

This policy sets forth the broad parameters that will be used in evaluating specific development proposals and the potential for erosion. Determinations regarding the limits of grading and measures selected to control erosion will be evaluated when a specific development proposal is submitted for approval.

**Response to Comment PP-2:** Commenter requests, for Chapter 7, Open Space and Conservation, clarification regarding the locations of all implementation measures within the document or Table of Contents. A complete set of all Draft 2050 General Plan Implementation Measures are located at the end of each Element and found in the Goals and Policies Report (Appendix C of the Draft EIR).

**Response to Comment PP-3:** Commenter states that, for Chapter 7, Open Space and Conservation, Impact OSC 3.6 Implementation Measure #3 is incorrect and that it is not the burden of new development to repair deficiencies in existing infrastructure. It is unclear to what specifically Commenter refers to, as there is no Impact OSC 3.6, Policy OSC-3.6 refers to existing clay operations, and Open Space and Conservation Implementation Measure #3 refers to the establishment of a mitigation fee for habitat preservation and replacement. As a general concept, however, Commenter is correct. However there are some instances in which new development requires the extension of public services, and existing facilities may not be sized or designed to accommodate the new demands. In such instances, upgrades to existing facilities may be required to be addressed by new development requiring the service.

#### ***Letter QQ. Sue Hamman, Resident***

**Response to Comment QQ-1:** Commenter states reasons for moving to Lincoln. No specific response is required.

**Response to Comment QQ-2:** Commenter states her opinion of growth. No specific response is required.

**Response to Comment QQ-3:** Commenter states her disapproval of expanding the population to attract more commercial, retail and/or industrial uses. No specific response is required.

**Response to Comment QQ-4:** Commenter is concerned with how the General Plan might impact the downtown area. The General Plan contains policies designed to support the viability of the downtown area, see Policy ED-4.3, ED-4.5:

- **Policy ED-4.3 Attract New Businesses.** The city shall encourage new businesses to locate in the following areas: downtown Lincoln; along the future Highway 65 Bypass; at the Lincoln Regional Airport; and in the business park surrounding the airport. *[New Policy]*

- **Policy ED-4.5 Retail Market.** The City shall identify a range of retail development sites and opportunities in order to promote a stronger local and regional retail market which meets the needs of the growing Lincoln population and complements the Lincoln downtown. *[New Policy]*

**Response to Comment QQ-5:** The Commenter asks if the City has commitments from specific businesses to locate in the City if the City reaches certain population levels. The City does not have such specific commitments from any particular business regarding locating in Lincoln. The economic and fiscal analysis conducted by Economic Planning Systems (Draft EIR, Appendix D) indicates that as the City grows and reaches certain population levels, the opportunity to attract larger retail businesses increases. As noted by Commenter, many factors go into a company's decision to locate into an area. The City's Draft 2050 General Plan is designed to take advantage of the opportunities Lincoln has regarding the City's location in the region and the existing and future transportation corridors that will provide access to sites designate for these commercial and business land uses.

**Response to Comment QQ-6:** Commenter is concerned that the addition of more residents would not result in the anticipated benefits and could destroy Lincoln's existing qualities. Growth in and of itself does not necessarily result in a desirable community. The proposed Draft 2050 General Plan has included numerous policies designed to result in a well planned community with a high level of services and that is fiscally sustainable. Such policies include but are not limited to the following: LU-1.6, LU-1.7, LU-1.8, LU-1.9, LU-1.10, LU-1-11, LU-1-12, which address the principles of smart growth; policy LU-15.13, which requires 40% open space within specific plan areas; and policies LU-15.1 and LU-16.1, which require large scale comprehensive planning of all village areas and special use districts. Through the implementation of these and other policies, the Draft 2050 General Plan endeavors to establish a program that will manage growth and result in positive benefits to the residents of the City.

**Response to Comment QQ-7:** Commenter presents a series of suggestions, ideas and concerns. Please refer to Master Response #1.

***Letter RR. Ralph W. and Rita E. Haury***

**Response to Comment RR-1:** Commenter requests that specific properties be rezoned as commercial. Please refer to Master Response #1.

***Letter SS. Rick Jaramillo***

**Response to Comment SS-1:** Commenter requests that specific properties be rezoned as commercial. Please refer to Master Response #1.

***Letter TT. George T. Kammerer, Hefner, Stark & Marois, LLP***

**Response to Comment TT-1:** Commenter appreciates the opportunity to comment on Draft EIR. No specific response is required.

**Response to Comment TT-2:** Commenter suggests a revision to the description of the planning area boundaries on pages ES-5, ES-6, 4-6, and 4-9 by making use of bold type. The changes will be made in the Final EIR. Please refer to Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment TT-3:** Commenter suggests a revised description on page 4-9 of the Draft EIR to acknowledge that the Village 3 boundaries extend west of Gladding Road not Manzanita Road. The change will be made in the Final EIR. Please refer to Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment TT-4:** Commenter notes that the mitigation measure that calls for the City to establish a fee program on new development to fund new and existing public services and utility infrastructure is limited by the requirement to show a nexus between the fee and improvements to existing public services and infrastructure. Commenter recommends that, in the interest of full disclosure, the Draft EIR should note that measures to improve existing public services will be required by the City only to the extent there is a legal nexus to do so. Commenter is correct in stating that a legal nexus is required in levying a fee to pay for public infrastructure and public services whether they are new or existing services. The City notes that fiscal mitigation measures to improve existing public services are required to provide the appropriate nexus. Refer to Master Response # 1 and response to Comment P-3.

Additionally, Policy ED-1.2 and Implementation Measure #3 on page 6-52 of the Draft EIR state that the City shall establish and implement appropriate fiscal mitigation measures on new development to improve existing or new public services and utility infrastructure.

**Response to Comment TT-5:** Commenter suggests that OSC-3.5, Minimize Land Use Conflicts and OSC-3.6 Existing Clay Operations should be revised to state that “To the extent necessary after consulting with Gladding-McBean, the City shall...” Please refer to Master Response #1.

**Response to Comment TT-6:** Commenter states that it would be legally justifiable for Impact OSC-3 to be considered less than significant after implementation of mitigation measures and permits outlined by the Draft EIR. Commenter believes that impacts identified in impact statement OSC-3 can be fully mitigated to a less than significant level with the implementation of the City’s policies and four implementation measures. While the City’s policies are designed to achieve a “no net loss” result, the City’s Draft 2050 General Plan, in combination with other development in the County, will contribute to the cumulative loss of native plant communities, wildlife habitat values, special status species and their potential habitat, and wetland resources in the region. As a result, the Draft 2050 General Plan would contribute to the loss of biological resources in the region, which in the cumulative condition would be significant and unavoidable, as stated on page 11-8 of the Draft EIR and on pages 2.2-72 through 2.2-73 of the Recirculated Draft EIR.

**Response to Comment TT-7:** Commenter suggests that a General Plan study area-wide application of the 40 percent open space requirement would allow greater flexibility among land owners. Refer to Master Response #1 and #6.

**Response to Comment TT-8:** Commenter suggests that high-quality habitat and open space areas ideal for preservation that are not located within the Villages should be allowed to stand in proximity for lands within the Village boundary. The General Plan policies represent broad principles, which will be further refined as specific proposals are brought before the City for consideration and determinations of consistency with adopted policies. As Specific Plans are reviewed the details of implementation will continue to be refined. Please refer to Master Response #1.

**Response to Comment TT-9:** Commenter suggests that increased flexibility offered by a General Plan study area-wide application of the 40 percent open space requirement would allow preservation of the most sensitive and biologically sensitive areas by allowing Villages with an excess of 40 percent open space to allow the excess to be made available to other Villages. Please refer to Master Response #1 and #6.

**Response to Comment TT-10:** Commenter asks whether past private land preservation would be counted towards the open space requirement. Please refer to Policy LU-15.13, Criteria for a listing of lands that can count towards the 40% requirement. Refer to Master Response #6.

***Letter UU. Dan Karleskint, Resident***

**Response to Comment UU-1:** Commenter believes that the Draft EIR did not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please refer to Master Response #5. Commenter also suggests that the Draft EIR analysis take into consideration the potential reduction in ROG, NOx, and CO as part of implementing a Neighborhood Electric Vehicle program. While there is the potential that NEVs and the implementation of the City's plan can successfully work to reduce the generation of ROG, NOx, and CO, the analysis in the Draft EIR takes a conservative approach in order to reflect the worst case situation. It is early in the implementation and use of NEVs, and there is not currently available data on the potential reduction to be expected from such programs.

***Letter VV. Thomas La Gabed***

**Response to Comment VV-1:** Commenter states his opinion regarding the proposed expansion of Lincoln's population. T No specific response is required to this comment.

***Letter WW. Larry Lake, Lake Development – Lincoln, LLC***

**Response to Comment WW-1:** Commenter recommends that the residential mixes, total dwelling units and land use acreages in the Villages need to have greater range to allow for flexibility for future development that responds to market conditions and infrastructure financing. Refer to Master Response # 7.

**Response to Comment WW-2:** Commenter recommends clear language in the Draft 2050 General Plan stating that agricultural zoned parcels within Villages may be converted to non-agricultural uses upon annexation into the City if the proper Williamson Act procedures for non-renewal and cancellation are followed. The City acknowledges that the provisions of the

Williamson Act will be followed in cases involving non-renewal or cancellation. Please refer to response to Comment J-3 and Master Response # 1.

**Response to Comment WW-3:** Commenter states that the minimum 40% open space City wide goal is high based on accepted planning practices. The selection of a 40% factor was a policy matter recommended by the Steering Committee as a result of the hearing process. Refer to Master Response #6.

**Response to Comment WW-4:** Commenter states that shared-use school fields and pocket parks should count towards meeting the open space requirements set forth by the General Plan. Refer to Master Response #6.

**Response to Comment WW-5:** Commenter states that park requirements should not exceed what is currently required in the existing areas of the City, which is 5 acres of parkland per 1,000 residents. Please refer to Master Response #1.

**Response to Comment WW-6:** Commenter notes that projected traffic generated by Village 1 may not warrant four lanes in the near term. The Draft 2050 General Plan calls for four lanes on several roadways in Village 1. The need for four lanes on these roadways was based on 2050 conditions. The Draft 2050 General Plan does not define the timing or phasing of transportation improvements, which would be determined as part of a specific plan for Village 1.

**Response to Comment WW-7:** Commenter recommends adding a discussion on subsequent processing of specific plans to allow for flexibility in the design of Villages. Refer to Master Response #7.

**Response to Comment WW-8:** Commenter recommends adding a discussion regarding contents of specific plans. Refer to Policy LU-15.1 and Policy LU-16-1, which provide for the contents of Specific Plans and Special Use Districts respectively. Please refer to Master Response #7.

**Response to Comment WW-9:** Commenter recommends that the Village Country Estates and Low Density Residential designations be combined into one category for Village 1 as well as to change the range of acreages, percentage of residential mix, number of dwelling units, and the number of residents for Village 1 in Tables 4-1 and 4-2. Refer to Master Response #7.

**Response to Comment WW-10:** Commenter recommends a change to the Draft 2050 General Plan for Village 1 by suggesting that the planned commercial acreage for Village 1 be established as a range of 10 – 20 acres instead of identifying the site to be 20 acres. Refer to Master Response #7.

**Response to Comment WW-11:** Commenter recommends the addition of language to the Draft EIR to indicate that in considering property under a Williamson Act contract, the proper procedures for non-renewal or cancellation will be followed. The City acknowledges that the provisions of the Williamson Act will be followed in cases involving non-renewal or cancellation. Please refer to response to Comment J-3 and Master Response #1.

**Response to Comment WW-12:** Commenter requests that the same language recommended in comment WW-11 be included in the Draft 2050 General Plan. Please refer to response to Comment WW-11 and Master Response #1.

**Response to Comment WW-13:** Commenter requests that the City amend its proposed park land dedication requirements for projects requiring development agreements to five acres per 1,000 residents. Please refer to Master Response #1.

**Response to Comment WW-14:** Commenter requests that the use of Form Based zoning be an option rather than a mandate for structuring future Village Specific Plans. Refer to Master Response #7.

**Response to Comment WW-15:** Commenter recommends that the installation of the ultimate four lanes of roadway on Oak Tree Lane between Virginiatown Road and Sierra College Blvd. and the Ferrari Ranch Road north be phased over time. Refer to Master Response #7 and the response prepared for Comment WW-6.

**Response to Comment WW-16:** Commenter recommends changing the proposed 40% Open Space requirement to a minimum percentage based upon development constraints, public facility and infrastructure requirements. Refer to Master Response #6.

**Response to Comment WW-17:** Commenter requests that school recreation areas adjacent to schools and open to the public along with mini parks and pocket parks be considered for credit in meeting the City's Open Space requirements. Refer to response to Comment WW-6 and Master Response #6.

***Letter XX. Gerry and Barbara Lammerding, Residents***

**Response to Comment XX-1:** Commenter feels that the Draft EIR did not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please see Master Response #5.

***Letter YY. Marcus Lo Duca, Richland Homes***

**Response to Comment YY-1:** Commenter refers to the Draft 2050 General Plan's Villages 4 and 6 criteria and believes that the second sentence of the criteria mistakenly refers to Country Estates as a transition. City staff reviewed these criteria and believes it reflects the goals of the Steering Committee. Detailed land uses will be determined during the preparation and processing of the specific plans for these Village. Refer to Master Response # 7.

**Response to Comment YY-2:** Commenter request clarification of "Right-of-Way" to be measured from back of curb to back of curb. The City defines "Right-of-Way" as the area necessary for public improvements including streets, bicycle lanes, public utility easements, sidewalks, including but not limited to meandering sidewalks, and public landscaping requirements. Please refer to Policy LU-15.13 and Master Response #1.

**Response to Comment YY-3:** Commenter requests the deletion of first village criteria on page 4-36 of the Draft 2050 General Plan. Please refer to Master Response #1.

**Response to Comment YY-4:** Commenter requests the deletion of ninth village criteria on page 4-37 of the Draft 2050 General Plan. Please refer to Master Response #1.

**Response to Comment YY-5:** Commenter requests modification of the third village criteria on page 4-36 of the Draft 2050 General Plan. Please refer to Master Response #1.

**Response to Comment YY-6:** Commenter requests that the High Density Residential (HDR) for Villages 5 and 6 at 8-12% be the same as Villages 1, 3 and 4 at 4-6% as presented in Table 4-5 on page 4-39 of the Draft 2050 General Plan. The results of Villages 5 and 6 having the same HDR percentage as Villages 1, 3, and 4 would be a reduction of 1,319 dwelling units or a 16% reduction. The number of HDR units in the Villages and SUDs would go from a total of 8,088 to 6,769 dwelling units or a reduction from 24% to 20 %.

Villages 5 and 6 have a 8-12% HDR because they are located in close proximity of the future Highway 65 Bypass, which will be a 4 lane north/south limited access regional freeway located on the west side of the Planning Area. In addition, Villages 5 and 6 have higher HDR percentage because those villages are close to 1,500 acres of Community Commercial and Regional Commercial land uses west of the airport to provide affordable housing for future employees in close proximity to those future job opportunities. Villages 1 and 3 have 4-6% HDR because they are located on the east side of the existing congested Highway 65. Village 4 has 5% HDR because it has an 812 acre conservation area. Refer to Master Response #7.

**Response to Comment YY-7:** Commenter requests that SUD-C not be required to have a single specific plan because it encompasses a wetland preservation area and an active non-residential application. Commenter requests a fifth bullet at the bottom of page 4-45 allowing the area west of Fiddymont Road to be planned separately. Please refer to Master Response #1 and #7.

**Response to Comment YY-8:** Commenter states that the requirement for each Village or specific plan area to have a minimum of 40 percent of gross area reserved for open space is unworkable and will result in an inability of the Draft 2050 General Plan at buildout to meet the City's fiscal goal. Commenter suggest the policy should be for the Draft 2050 General Plan expansion area overall to contain a minimum of 40% open space with a floor for any Village or specific plan area of no less than 30%. Please refer to Master Response #1 and #6.

**Response to Comment YY-9:** Commenter suggest substituting the words "Within the General Plan Update expansion area outside of current City limits" for the words "within each village or specific plan area" at the beginning of Policy LU-15.13, with a floor of 30 percent for each village or specific plan area. Please refer to Master Response #1 and #5.

***Letter ZZ. Lillian Nawman, Resident***

**Response to Comment ZZ-1:** Commenter states that the Draft EIR did not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please refer to Master Response #5.

***Letter AAA. Fran Neves, Resident***

**Response to Comment AAA-1:** Commenter requests that the City consider including an additional road connection into the City of Rocklin from the Twelve Bridges development in the southern portion of the City. Due to previous planning decisions and the City of Rocklin's interest in providing for only limited connections between the City of Lincoln and the City of Rocklin, the suggested connection cannot be made. Please refer to Master Response #1.

***Letter BBB. Jan Quarton, Huber Property Management Inc.***

**Response to Comment BBB-1:** Commenter requests that specific residential properties be rezoned as Business Professional. Please refer to Master Response #1 and #4.

***Letter CCC. Jeffrey B. Ray, SunCal Companies***

**Response to Comment CCC-1:** Commenter requests that a 48.7 acre parcel located on the eastern portion of the proposed sphere of influence along Sierra College Blvd. be included in the sphere. Please refer to Master Response #1 and #3.

***Letter DDD. Clint Ritchie, Resident***

**Response to Comment DDD-1:** Commenter states that the Draft EIR did not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please refer to Master Response #5.

***Letter EEE. Larry and Karen Schurr, Resident***

**Response to Comment EEE-1:** Commenter states that the Draft EIR did not provide sufficient information related to the City's current Neighborhood Electric Vehicle Transportation Plan. Please refer to Master Response #5.

***Letter FFF. Dmitry A. Semenov, Signature Properties***

**Response to Comment FFF-1:** Commenter indicates that the acreage, land uses, and unit counts for Village 7 vary from those submitted on a recent Specific Plan application to the City. The General Plan database for land area was obtained from the Placer County Assessor's Office information that is available in a GIS format. It is anticipated that the more precise information generated for specific plan applications will vary to some degree due to the greater precision in drafting the boundaries for Village 7 and better information made available through additional land survey work. The variance is 2.5% and would not be unexpected.

In addition, Commenter makes reference to a pending application that may involve changes through the entitlement and environmental process. Within the context of the Draft 2050 General Plan and the Draft EIR analysis, a slight variance of 1.6% in terms of units would not be viewed as a significant change to the results of the analysis. In addition, it should be noted that Commenter makes reference to a submitted application that has not been approved by the City. At this time it would be uncertain as to the exact number and type of land uses the City will approve for Village 7. Please refer to Master Response #1 and #7.

**Response to Comment FFF-2:** Commenter requests that acreage and dwelling units in the Village 7 specific plan application be included in the Draft EIR. The Draft 2050 General Plan provides a description of Village 7, which is presented in the Draft EIR on pages 4-12 and 4-13. As estimated in the Draft 2050 General Plan, the dwelling units for Village 7 are presented in Table 4-14 in the Draft EIR. Please refer to the response prepared for Comment FFF-1, Master Response #1 and Master Response #7.

**Response to Comment FFF-3:** Commenter proposes a change to policy OSC 5.13, which is used as a mitigation measure regarding lighting impacts. Commenter notes that as a practical matter it may be infeasible to prevent any reflection from artificial lighting from entering adjacent natural or open space areas. The policy is not intended to prevent each single photon of light from being reflected into natural and open space areas, but is intended to prevent the direction of artificial light into these areas during the initial design of projects. Please refer to Master Response #1.

**Response to Comment FFF-4:** Commenter indicates that Draft EIR noise mitigation measure appears to go significantly beyond the current City noise analysis requirement. In addition, Commenter indicates that the noise mitigation measurement may result in significant additional costs with no obvious resulting benefit. The mitigation measure does not require a post-project assessment project in every land development application; the measure calls for the noise analysis to describe a post-project assessment that could be used if necessary. Please refer to Master Response #1.

### ***Letter GGG. Gloria and Donald Shea***

**Response to Comment GGG-1:** Commenter requests that specific properties be rezoned as commercial. Please refer to Master Response #1 and #4. The comment does not raise issues regarding the adequacy of the Draft EIR analysis.

### ***Letter HHH. Jane Tahti, Resident***

**Response to Comment HHH-1:** Commenter states that additional detail is required to support findings related to the impact of retail centers on Downtown businesses. Chapter 3 of the Draft EIR establishes Standards of Significance, guidelines against which future projects will be determined for consistency. A Proposed Project is said to have a significant impact for purposes of the EIR if it would “create a substantial adverse physical change to one or more shopping area(s) within the City of Lincoln” (page 3-4). It also states that California Environmental

Quality Act (CEQA) Guidelines require impacts analyzed in an EIR to be “related to physical change” in the environment. The CEQA Guidelines “do not directly require analysis of a project’s social or economic effects because such effects are not, in and of themselves, considered significant effects on the environment.” As the Proposed Project “would not likely contribute to physical deterioration or urban decay” (page 3-6), by definition it does not result in a significant impact.

As new retail or commercial projects are considered by the City, each will be analyzed to determine the potential for local urban decay and regional blight on a case-by-case basis, per Policy ED-6.8.

Chapter 3: Economic Development of the Goals and Policies Report outlines several policies directed at assisting downtown businesses. These policies and implementation measures recognize the potential impact of new development on downtown businesses. Specifically, policies ED-4.3, ED-4.5, ED-6.1, and ED-6.5 establish the Citywide policies to encourage compatible new businesses downtown, support the downtown’s existing businesses, and increase the overall vitality of downtown:

- **Policy ED-4.3 Attract New Businesses.** The City shall encourage new businesses to locate in the following areas: downtown Lincoln; along the future Highway 65 Bypass; at the Lincoln Regional Airport; and in the business park surrounding the airport. *[New Policy]*
- **Policy ED-4.5 Retail Market.** The City shall identify a range of retail development sites and opportunities in order to promote a stronger local and regional retail market which meets the needs of the growing Lincoln population and complements the Lincoln downtown. *[New Policy]*
- **Policy ED-6.1 Downtown Commercial Area.** The City and/or its Redevelopment Agency shall continue to improve the downtown commercial area in order to create a vibrant retail, business, and entertainment center.
- **Policy ED-6.5 Relocation of Incompatible Uses.** The City will support the relocation of incompatible uses from the downtown in order to assist in the development of a vibrant downtown for retail, office, and entertainment activities. *[New Policy]*

**Response to Comment HHH-2:** Commenter asks whether the Draft EIR determined that Impact LU-3 would be less than significant because the City will comply with programs such as participation in the habitat conservation planning efforts. The impact analysis for Impact LU-3 indicates that with implementation of three specified policies, the impact is considered less than significant. Those policies are OSC-1.2, OSC-4.1, OSC-5.3, and they would be implemented by Open Space and Conservation Implementation Measures #1.0 - #3.0. As explained in the Draft EIR, because the Proposed Project contains these self-mitigating measures, the impact is determined to be less-than-significant.

**Response to Comment HHH-3:** Commenter states that mitigation measures proposed under Impact LU-4 do not make sense since you cannot protect farmland by destroying it. As stated in the impact analysis, the loss of farmland is significant and unavoidable. While farmland will be converted as part of implementing the Proposed Project, policies are in place that assist in the preservation of the remaining agricultural lands:

- **Policy LU-5.3 Protect Agriculture.** The City shall ensure that agricultural land uses are not prematurely terminated by protecting the continued operation of agricultural land uses. *[Revised Land Use Element Policy 4.28]*
- **Policy LU-5.4 Agricultural Buffers.** The City shall require that agricultural land uses designated for long-term protection (i.e., in a Williamson Act contract or under a conservation easement) shall be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, soundwalls, fencing and berming. *[Revised Land Use Element Policy 4.29]*
- **Policy OSC-2.1. Agricultural Buffers.** The City will provide for open space or other appropriate buffers, to protect agricultural operations located adjacent to the City planning boundaries, when reviewing land use plans for such areas. *[New Policy]*

**Response to Comment HHH-4:** Commenter asks for details regarding traffic impacts associated with the proposed project and does not believe that there is enough information comparison the impacts between the 66,000 general plan population and the 130,000 general plan population. While the Summary of Impacts and Mitigation Measures (Table ES-3) identifies “significant and unavoidable” impacts with an “SU,” Section 5 provides a detailed analysis of each level of service impact and mitigation measures.

Nearly all of the transportation impacts in the Draft EIR that were identified as “significant and unavoidable” are located outside the City’s proposed Sphere of Influence. Feasible improvements were identified at most of the impacted locations in other jurisdictions. The City does not have control of these impacted roadways and, thus, cannot ensure that mitigation measures are implemented. Therefore, the impacts in other jurisdictions were identified as “significant and unavoidable.”

**Response to Comment HHH-5:** Commenter suggests that Impact PFS-3 remain “Significant and Unavoidable” or “Potentially Significant” until a regional water resources management plan is established. The intent of including a mitigation measure that proposes a new policy, PFS-2.19, that would establish a regional water resources management plan is to mitigate the impact to regional water resources, including groundwater resources. The impact is determined less-than-significant based on the assumption that this mitigation will be implemented. Also please refer to Master Response #9.

**Response to Comment HHH-6:** Commenter would like to know why, after implementation of mitigation, impacts to biological resources remain significant and unavoidable. Commenter refers to Impacts OSC-3 through OSC-6 (see pages 7-11 through 7-18 of the Draft EIR). The policies contained within the Draft 2050 General Plan and proposed as mitigation for these impacts seek to protect a variety of biological resources within the Study Area. However,

implementation of the Proposed Project would still result in the conversion of some agricultural and open space areas, which would result in the overall reduction of a plant or wildlife species habitat. For this reason, the impacts remain significant and unavoidable.

**Response to Comment HHH-7:** Commenter would like the Draft EIR to discuss health and economic impacts of pollution from the Proposed Project. Additionally, Commenter asks for citations regarding health and economic figures from cities with comparable pollution and population increases. The health effects of pollutants identified in the Draft EIR can be found on pages 8-13 through 8-16 of the Background Report, which is included as Appendix B. A comparative analysis of pollution in other cities in California population sizes was not a part of the EIR analysis and is not required to be included.

**Response to Comment HHH-8:** Commenter would like to know how many acres of the sphere of influence outside of the City limits will be open to tech, office, and commercial development. Commenter states that if the area inside of the sphere of influence is all open to this development then the open space acreage stated in Table ES-1 on page ES-6 is misleading. The areas outside of the City limits and inside the Sphere of Influence are primarily designated as Village and Special Use District areas. Future development within these areas will be guided by the adoption of a Specific Plan for each Village and SUD.. These areas will contain a variety of land uses, including commercial and office land uses. As required by Policy LU-15.13 of the General Plan, 40% of each of these Villages and Special Use Districts will be in an open space designation that meets the criteria set forth in Policy LU-15.13.

**Response to Comment HHH-9:** Commenter notes that land use acreage in Table ES-1 on page ES-6 of the Draft EIR is incorrect. Commenter appears to have misread Table ES-1. The Proposed Project is estimated to add 694 acres of new parks based upon estimates of the number of dwelling units and persons per household and applying the General Plan requirements for park land. The 427-acre number noted in the comment only reflects the difference between the 267 acres of parkland in the existing City and that projected for the future City. In total, the City would have an estimated 961 acres of parkland once the Proposed Project was built out. All of the numbers listed under “Proposed Increase” are to be read in a similar manner. In terms of the comment regarding a ratio related to parks and other land uses such as commercial, park land requirements are driven by population increases connected to the housing stock and do not have a relationship with land uses that do not generate additional residents.

**Response to Comment HHH-10:** Commenter states that acreage for Commercial/Industrial land uses on page ES-6 do not equate to the acreage cited in the accompanying text. Commenter is correct that the amount of Industrial land should have been represented as 3,403 acres (combining the Business Park, Industrial, and Industrial Planned Development) instead of the 5,194 acres shown in the text on page ES-6. Corrections to these numbers will be made. Please see Chapter 6, “Changes and Edits to the Draft and Recirculated Draft EIR.”

**Response to Comment HHH-11:** Commenter requests that a new diagram be provided that modifies the color coding of the Open Space, Agricultural, Country estates, and Rural Residential aspects of the General Plan. Changes in the color scheme of the diagram have been made to improve ease of reading.

**Response to Comment HHH-12:** Commenter states that an open space standard and definition be established before the General Plan is approved. General Plan Policy LU-15.13 (see page 4-41 of the Draft 2050 General Plan) requires that 40% open space be set aside in each Village and specific plan. The policy also sets forth a criteria listing the types of open space that will count towards meeting the 40% requirement. This policy provides guidance for the types of land uses that may count towards the 40% requirement. Please also refer to Master Response #6.

***Letter III. Kelly Bess, Resident (dated January 10, 2007)***

**Response to Comment III-1:** As stated in previous correspondence, Commenter requests that the boundary lines for General Plan Village 5 be corrected to include the entire parcel known as 390 Dowd Road, Lincoln, CA. Please see the response prepared for Comment Y-1 and refer to Master Response #3.

***Letter JJJ. Cheri Frost, Resident (dated January 16, 2007)***

**Response to Comment JJJ-1:** Commenter is concerned about the Draft 2050 General Plan projected buildout of 132,000 persons in 2050 resulting in additional traffic, increase in crime, loss of agricultural land, loss of open space and loss of wildlife habitat. Refer to Master Response #1 and #8.

***Letter KKK. Dick and Betty Tietsort, THM Homes (dated October 11, 2004)***

**Response to Comment KKK-1:** Commenter requests that two parcels be included in the City's Sphere of Influence and the Draft 2050 General Plan boundaries. Refer to Master Responses #1 and #4.

***Letter LLL. Dick and Betty Tietsort, THM Homes (dated October 18, 2004)***

**Response to Comment LLL-1:** Commenter provides several questions as to when decisions will be made about the inclusion of several parcels within the City's Sphere of Influence. Please refer to Master Response #3 and #7.

***Letter MMM. Carol and Albert Scheiber, Scheiber Ranch (dated June 23, 2005)***

**Response to Comment MMM-1:** Commenter requests specific zoning for their property west of Lincoln. Specific land uses have not yet been assigned to those areas located within either a Village or Special Use District. Such areas will require the development and approval of a Specific Plan, as required by Policies LU-15.1 and LU-16.1,. Refer to Master Responses #1 and #4.

***Letter NNN. Shepard Johnson, Shepard Johnson Properties (dated June 27, 2005)***

**Response to Comment NNN-1:** Commenter requests the land use designation of property between 2<sup>nd</sup> and 3<sup>rd</sup> Streets be changed from Commercial (C) to Planned Development (PD). Refer to Master Responses #1 and #4.

***Letter OOO. John and Sheila Fanucchi, Property Owners (dated June 27, 2005)***

**Response to Comment OOO-1:** Commenter requests that property at the D Street and Highway 193 intersection be rezoned. Refer to Master Responses #1 and #4.

***Letter PPP. Walter Fickewirth, Resident (dated June 28, 2005)***

**Response to Comment PPP-1:** Commenter requests a rezoning of property. Refer to Master Responses #1 and #4.

***Letter QQQ. Walter Fickewirth, Resident (dated August 2, 2005)***

**Response to Comment QQQ-1:** Commenter requests that property along Wise Road be rezoned to Commercial. Refer to Master Responses #1 and #4.

***Letter RRR. Pat Huber, HPM (dated September 15, 2005)***

**Response to Comment RRR-1:** Commenter notes support of a zoning request made by the Brammer family. No specific response is required.

***Letter SSS. Kelly and Virginia Bess, Resident (dated November 25, 2005)***

**Response to Comment SSS-1:** Commenter requests that property on South Dowd Road be included in the Planning Area. See response to Comment III-1.

***Letter TTT. Jerry Aplash, Burrell Consulting Group, Inc. (dated February 2, 2006)***

**Response to Comment TTT-1:** Commenter requests that the General Plan Land Use Designations for the properties along South O Street be changed from LDR to HDR. Refer to Master Responses #1 and #4.

***Letter UUU. AI Aport, Aport 55 LLC (dated May 17, 2006)***

**Response to Comment UUU-1:** Commenter requests that property along First Street be rezoned. Refer to Master Responses #1 and #4.

***Letter VVV. Lyn Reeve and Ed Bailey, Gold Nugget Realtors, Inc. (dated September 24, 2006)***

**Response to Comment VVV-1:** Commenter requests a zoning change from Business Professional to Commercial for a property along South Highway 65. Refer to Master Responses #1 and #4.

***Letter WWW. Daren and Alba Moore, Business Owners (dated September 2006)***

**Response to Comment WWW-1:** Commenter requests that property be rezoned to Commercial. Refer to Master Responses #1 and #4.