
3. REVISIONS TO THE DRAFT EIR TEXT

3

REVISIONS TO THE DRAFT EIR TEXT

3.1 INTRODUCTION

The Revisions to the Draft EIR Text chapter presents minor corrections, additions, and revisions made to the Draft EIR initiated by the Lead Agency (Placer County) based on comments received during the public review period by reviewing agencies and/or the public.

The changes represent minor clarifications/amplifications of the analysis contained in the Draft EIR and do not constitute significant new information that, in accordance with CEQA Guidelines, Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

3.2 DESCRIPTION OF CHANGES

New text is double underlined and deleted text is ~~struck through~~. Text changes are presented in the page order in which they appear in the Draft EIR.

3. Project Description

Since release of the Draft EIR, County Staff has identified the need for a minor clarification on page 3-10 with reference to wastewater disposal requirements, as follows:

Wastewater Disposal

The Zoning Text Amendment clarifies that winery or farm brewery process wastewater is prohibited from being discharged to a septic system. Process wastewater is water used in the wine or beer making process, which is high in organic material. A Waste Discharge Permit or Waiver of Waste Discharge issued by the Regional Water Quality Control Board (RWQCB) is required prior to building permit issuance if the wastewater will not be discharged into a community sewer system, but rather an alternative form of discharge would be used, such as land application. With land application systems, process wastewater is applied to a vegetated land surface, and the applied wastewater is treated as it flows through the plant and soil matrix. Land application of process wastewater from wineries and farm breweries already occurs within the County, under the RWQCB's Waiver of Waste Discharge Requirements for Small Food Processors, Wineries, and Related Agricultural Processors, and would not change under the proposed Zoning Text Amendment.

Additionally, the Zoning Text Amendment clarifies that a separate septic system from the residence needs to be provided if a winery or farm brewery has buildings with plumbing.

The foregoing revision is for clarification purposes and does not alter the analysis or conclusions within the Draft EIR.

Consistent with the *Erratum to the Placer County Winery and Farm Brewery Zoning Text Amendment Draft Environmental Impact Report* released by the County on April 26, 2019, page 3-11 of the Draft EIR is hereby revised as follows:

Add “Accessory Use - Restaurant” as Allowable Land Use with CUP

Restaurants are described as a land use in the Section 17.04.030 – Definitions of the Placer County Zoning Ordinance. According to Section 17.06.050 – Land Use and Permit Tables, Restaurants are not currently allowed in Agricultural, Resource, ~~or~~ Open Space, or Residential land uses. Specifically, the proposed change refers to the Agricultural Exclusive, Farm, ~~and~~ Forest, Residential Agricultural, and Residential Forest zone districts. The project proposes that an “Accessory Use - Restaurant” would be allowed in the Agricultural Exclusive, Farm, ~~and~~ Forest, Residential Agricultural, and Residential Forest zone districts as long as the food preparation and service is subordinate to the primary use on a property as a winery or farm brewery, and subject to a Conditional Use Permit.

In addition, Table 1 in Appendix A to the Draft EIR is hereby revised, as shown on the following page. The language reflects a correction to allow “Accessory Use – Restaurant” at permitted wineries or farm breweries in the Residential Agricultural and Residential Forest zone districts subject to a Conditional Use Permit.

The aforementioned revisions are a result of a clerical error, and do not raise new issues with regard to environmental effects or require changes to the analysis or conclusions contained within the Draft EIR, which remains adequate.

Table 1: Permit Requirements

	Commercial						Industrial				Residential		Agriculture and Resource		
	CPD	C2	C3	HS	C1	RES	AP	BP	IN	INP	RA	RE	AE	E	FOR
<u>Small Winery Production 0-20,000 cases</u>	<u>CUP</u>	<u>MUP</u>	<u>C</u>			<u>ARP</u>		<u>C</u>	<u>C</u>	<u>C</u>	<u>MUP</u> ^[1]	<u>MUP</u> ^[1]	<u>C</u> ^[1]	<u>C</u> ^[1]	<u>C</u> ^[1]
<u>Large Winery Production 20,000+ cases</u>			<u>MUP</u>					<u>MUP</u>	<u>MUP</u>	<u>MUP</u>	<u>MUP</u> ^[2]	<u>MUP</u> ^[2]	<u>MUP</u> ^[2]	<u>MUP</u> ^[2]	<u>MUP</u> ^[2]
<u>Farm Brewery Production 0-1,500 barrels</u>											<u>MUP</u> ^[1]	<u>MUP</u> ^[1]	<u>C</u> ^[1]	<u>C</u> ^[1]	<u>C</u> ^[1]
<u>Wholesale and Retail Sales of Wine, Grape or Beer Products On-Site</u>	<u>CUP</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>MUP</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>MUP</u> ^[1]	<u>MUP</u> ^[1]	<u>C</u> ^[1]	<u>C</u> ^[1]	<u>C</u> ^[1]
<u>Accessory Use - Restaurant</u>											<u>CUP</u>	<u>CUP</u>	<u>CUP</u>	<u>CUP</u>	<u>CUP</u>
<u>Tasting Room and Retail Sales of Wine- or Beer - Related Merchandise</u>	<u>CUP</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>MUP</u>	<u>C</u>	<u>C</u>	<u>C</u>	<u>See Section D.3.b.</u>				

[1] 4.6 acre minimum required.

[2] Ten acre minimum required.

KEY TO PERMIT REQUIREMENTS	
Zoning Clearance required (Section 17.06.050)	C
Administrative Review Permit required (Section 17.06.050)	ARP
Minor Use Permit required (Section 17.06.050)	MUP
Conditional Use Permit required (Section 17.06.050)	CUP
Use not allowed	

5. Air Quality

In response to public comments, page 5-10 of Chapter 5, Air Quality, of the Draft EIR is hereby revised as follows:

Local Air Quality Monitoring

Air quality is monitored primarily by ~~CARB~~ the Air District in Placer County at various locations to determine which air quality standards are being violated, and to direct emission reduction efforts, such as developing attainment plans and rules, incentive programs, etc. ~~Several~~ Four air quality monitoring stations are maintained by the Air District and one station is maintained by CARB within Placer County. The two air monitoring stations nearest to the existing study facilities are located at Auburn-Atwood Road and Lincoln at 2885 Moore Road.

The foregoing revisions are for clarification purposes and would not alter the analysis or conclusions within the Draft EIR.

In addition, Table 5-5 in the Draft EIR is hereby revised as follows:

Table 5-5				
Air Quality Data Summary for the Auburn-11645 Atwood Road Station (20146-20168)				
Pollutant	Standard	Days Standard Was Exceeded		
		2014 6	2015 7	2016 8
1-Hour Ozone	State	05	03	012
	Federal	10	40	52
8-Hour Ozone	State	1727	1630	2736
	Federal	64	100	159
24-Hour PM _{2.5}	Federal	40	10	011
24-Hour PM ₁₀ ¹	State	-	-	-
	Federal	-	-	-
1-Hour Nitrogen Dioxide ¹	State	-	-	-
	Federal	-	-	-
¹ 24-Hour PM ₁₀ and 1-Hour Nitrogen Dioxide not monitored at Auburn-11645 Station Source: California Air Resources Board, Aerometric Data Analysis and Management (iADAM) System, http://www.arb.ca.gov/adam/welcome.html , accessed March 2018 July 2019.				

The foregoing revisions are for clarification purposes and would not alter the analysis or conclusions within the Draft EIR. Specifically, the local air quality monitoring site data has been updated. None of this data is used for the project-specific air quality modelling; thus, no changes to the analysis contained in the Draft EIR would be required as a result.

In response to public comments, page 5-12 and 5-13 of the Draft EIR are hereby revised as follows:

Air quality is monitored and regulated through the efforts of various ~~international~~, federal, State, and local government agencies. Agencies work jointly and individually to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for regulating and improving the air quality within the project area are discussed below.

The foregoing revision is for clarification purposes and does not alter the analysis or conclusions within the Draft EIR.

In response to public comments, pages 5-17 and 5-18 of the Draft EIR are hereby revised as follows to provide some further regulatory context that may apply to existing operations at the study facilities:

PCAPCD Rules and Regulations

All projects under the jurisdiction of the PCAPCD are required to comply with all applicable PCAPCD rules and regulations. In addition, PCAPCD permit requirements apply to many commercial activities (e.g., print shops, drycleaners, gasoline stations), and other miscellaneous activities (e.g., demolition of buildings containing asbestos). The proposed project is required to comply with all applicable PCAPCD rules and regulations, which shall be noted on County-approved construction plans. The PCAPCD regulations and rules include, but are not limited to, the following:

Regulation 2 – Prohibitions

Regulation 2 is comprised of prohibitory rules that are written to achieve emission reductions from specific source categories. The rules are applicable to existing sources as well as new sources. Examples of prohibitory rules include Rule 202 related to visible emissions, Rule 217 related to asphalt paving materials, Rule 218 related to architectural coatings, Rule 228 related to fugitive dust, Rule 205 related to nuisance, and Rule 225 related to wood-burning appliances.

Rule 228 sets forth requirements necessary to comply with the Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17, Section 93105, of the California Code of Regulations), as discussed above. Rule 228 requires projects involving earth-disturbing activities to implement various dust control measures, such as minimizing track-out on to paved public roadways, limiting vehicle travel on unpaved surfaces to 15 miles per hour, and stabilization of storage piles and disturbed areas.

Regulation 3 – Open Burning

The purpose of Regulation 3 is to establish standards and administrative requirements under which agricultural burning, including the burning of agricultural wastes, limited to the growing of crops or raising of fowl or animals, may occur in a reasonably regulated manner that manages the generation of smoke and reduces the emission of particulates and other air contaminants from such burning. The rules for burning smoke management apply to all burning located within Placer County except where otherwise prohibited by a local jurisdiction. For example, Rule 302, Agricultural Waste Burning Smoke Management,

requires that any outdoor burning associated with an agricultural operation is required to obtain a year-round burn permit from the PCAPCD.

Regulation 5 – Permits

Regulation 5 is intended to provide an orderly procedure for the review of new sources, and modification and operation of existing sources, of air pollution through the issuance of permits. Regulation 5 primarily deals with permitting major emission sources and includes, but is not limited to, rules such as General Permit Requirements (Rule 501), New Source Review (Rule 502), Emission Statement (Rule 503), Emission Reduction Credits (Rule 504), and Toxics New Source Review (Rule 513). It should be noted that portable operating equipment greater than 50 horsepower may be subject to registration under the Portable Equipment Registration Program (PERP) administered by CARB.

The foregoing revisions are for clarification purposes and would not alter the analysis or conclusions within the Draft EIR.

10. Transportation and Circulation

In response to public comments, page 10-19 of the Draft EIR is hereby revised to provide additional regulatory context information, as follows:

Existing transportation policies, laws, and regulations that would apply to the proposed Zoning Text Amendment are summarized below. Federal ~~and/or State~~ plans, policies, regulations, or laws related to transportation and circulation are not directly applicable to the proposed project. Rather, the analysis presented herein focuses on local Placer County regulations, which govern the regulatory environment related to transportation and circulation at the project level, as well as State regulations.

State Regulations

The State Route SR 193 Transportation Concept Report, 2017 (SR 193 TCR) documents Caltrans' long-term plan for this facility. The TCR indicates that SR 193 from Sierra College Boulevard to Taylor Road will remain a two-lane conventional highway with bike lanes and curve improvements. The TCR suggest that little growth will occur, with the current average segment daily volume of 5,300 ADT increasing to 6,654 at the TCR Horizon. The TCR indicates that the segment currently operates at LOS E and will continue to operate at LOS E in the future under both No Build and Build conditions.

The foregoing addition is for clarification purposes and would not alter the analysis or conclusions within the Draft EIR.

In response to the recently published court case [*Citizens for Positive Growth & Preservation v. City of Sacramento* (2019)], the County has added the following VMT discussion to page 10-42 of the Transportation and Circulation section of the EIR, following Impact Statement 10-5.

Vehicle Miles Traveled

Since the release of the Draft EIR, the Third Appellate District court published an opinion (December 18, 2019) regarding *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019). Among other points, Citizens challenged the City of Sacramento’s adoption of its General Plan based on its use of the level of service (LOS) metric instead of the vehicle miles traveled (VMT) metric in the transportation impacts section. In 2018, the Secretary of the Natural Resources Agency promulgated and certified CEQA Guidelines section 15064.3 to implement Public Resources Code section 21099(b)(2). The Court held that the plain language of Public Resources Code section 21099(b)(2) provides that “[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any.” On this basis, the Court concluded that the General Plan’s LOS determinations could not constitute a significant environmental impact.

Citizens argued that if potential automobile delay caused by the General Plan’s LOS determinations did not constitute a significant impact pursuant to Public Resources Code section 21099(b)(2), then the City should have been required to conduct a VMT analysis pursuant to CEQA Guidelines section 15064.3. The Court disagreed because the City’s EIR was certified before CEQA Guidelines section 15064.3 was enacted, and the criteria set forth therein only apply prospectively (i.e., Statewide beginning on July 1, 2020).

Importantly, the Court did not provide any guidance as to other suggested method(s) by which an agency should determine significant traffic impacts during this “interim” period. In addition, while not discussed in the subject court case, it is noteworthy that section 21099(b)(1) specifically refers to establishing criteria for determining the significance of transportation impacts of projects within transit priority areas. None of the winery/farm brewery growth sub-regions are located within designated transit priority areas. As a result, the County believes its analysis of traffic impacts in the Winery and Farm Brewery Zoning Text Amendment Project Draft EIR remains instructive. In addition, while VMT analysis is not required statewide until July 1, 2020, the following qualitative discussion of VMT has been provided for the proposed project.

The *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) was prepared by the Governor’s Office of Planning and Research (OPR) to provide technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. OPR’s Technical Advisory identifies that one potential approach for determining whether a project may have a significant VMT impact is to consider whether the project is consistent with the applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). For the SACOG region, this consists of the Metropolitan Transportation Plan/SCS (MTP/SCS).

The majority of the existing winery and farm brewery facilities, as well as the projected growth in these facilities over the next 20 years (see Figure 3-3 and Table 3-3 of the Draft EIR), are located within areas designated “Rural Residential Communities” (includes agricultural areas) in both the 2016 MTP/SCS and recently adopted 2020 MTP/SCS. According to the MTP/SCS (pg. 40), “Rural Residential Communities are typically located outside of urbanized areas and designated in local land use plans for rural residential

development. Rural Residential Communities are predominantly residential with some small-scale hobby or commercial farming. Travel occurs almost exclusively by automobile, and transit service is minimal or nonexistent.” For unincorporated Placer County, the 2020 MTP/SCS assumes an additional 300 jobs and 1,050 housing units would be developed in Rural Residential Communities by 2040 (see Appendix C of the 2020 MTP/SCS) (note: this represents a reduction in the forecasts provided in the 2016 MTP/SCS for Year 2035 = increase of 793 jobs and 3,783 units).

Other portions of the winery/farm brewery growth sub-regions are considered by the MTP/SCS to be “Natural Resource Lands” (i.e., the far northerly areas shown in Figure 3-3 of the Draft EIR). These areas are also known as “Lands not identified for development in the MTP/SCS”. However, the 2016 MTP/SCS notes (Table 3.10) that existing developed acres in the “Lands not identified for development in the MTP/SCS” Community Type were included in the Rural Residential Community type totals, out of recognition that the farm homes and agricultural-related uses in these areas may increase in intensity.

Figures 3-10 and 3-11 of the 2020 MTP/SCS show the 2016 and projected 2040 vehicle miles traveled per capita for the six-County SACOG region. The winery/farm brewery growth sub-regions are shown as having both now, and in the future, 150% of the regional average VMT per capita.

The above is instructive on more than one level. First, the MTP/SCS does anticipate some increased activity/growth within the majority of the winery/farm brewery sub-regions. Second, these areas are recognized as having high VMT per capita both now and in the future (2040 MTP/SCS Planning Period). The MTP/SCS is aimed at reducing greenhouse gas emissions through VMT reduction, and these efforts are primarily focused on urban areas, where investments in the roadway system and transit, bike, pedestrian infrastructure are built into the MTP/SCS to achieve identified air quality targets.

Thus, it can be concluded that the potential increased activity associated with the proposed Winery and Farm Brewery ZTA would not conflict with the MTP/SCS’ strategy for reducing VMT through investments in roadway and multi-modal infrastructure primarily in urban areas; and a less-than-significant VMT impact would result.

The foregoing revisions are made for amplification purposes in response to recent court case law, and are not considered significant new information pursuant to CEQA Guidelines Section 15088.5(a).

11. Utilities and Service Systems

In response to public comments, page 11-1, of the Draft EIR is hereby revised as follows:

Wastewater Conveyance and Treatment

The existing study facilities currently produce two types of wastewater: 1) process wastewater produced from wine/beer-making operations, which is tied to production levels at each facility; and 2) wastewater from bathrooms, sinks, and dishwashers at the study facilities. The latter of the two types is influenced by events and, thus, is the focus of this EIR. It should be noted that for the process wastewater, the existing study facilities currently have waivers for waste discharge requirements under Regional Water Quality Control Board (RWQCB) Resolution No. ~~R5-2003-0406~~ R5-2015-0005, Waiver of Waste Discharge Requirements for Small Food Processors, Including Wineries, Within the Central Valley Region.

The foregoing revision is for clarification purposes and does not alter the analysis or conclusions within the Draft EIR.

12. Cumulative Impacts and Other CEQA Sections

Since the release of the Draft EIR, the California Transportation Commission (CTC) approved the State Route (SR) 49 Safety Improvements Project, which includes funding for improvements to SR 49 in the vicinity of SR 49/Cramer Road intersection. The improvements identified by CTC would result in acceptable operations at this state route intersection under the cumulative scenario evaluated in the EIR. Thus, pages 12-55 and -56 of the Draft EIR are hereby revised as follows:

SR 49/Cramer Road

Because conditions exceed LOS D with and without the project under the cumulative condition, the significance of the project's incremental impact at intersections controlled by side street stop signs is based on the incremental change in delay and is also predicated on satisfaction of peak hour traffic signal warrants. In this case, because the incremental change in overall delay (6.8 seconds) exceeds the increment allowed under Placer County methodology (i.e., 2.5 seconds), and projected traffic volumes satisfy peak hour warrants at this time, the project's incremental impact is significant at this intersection.

Conclusion

Based on the above, the proposed project would result in a ***cumulatively considerable*** contribution to the cumulative impact at the SR 49/Cramer Road intersection.

Mitigation Measure(s)

Any improvements to the SR 49/Cramer Road intersection would be subject to approval by Caltrans. As noted in Chapter 10, Transportation and Circulation, of this EIR, Caltrans and Placer County have considered future installation of roundabouts at selected intersections along the SR 49 corridor between Auburn and the Bear River. Installation of a two-lane roundabout at the SR 49/Cramer Road intersection would result in acceptable operations; however, the intersection may be better served by limiting intersection movements to right-turns only in concert with U-turn opportunities at future roundabouts at nearby intersections. Alternatively, signalization of the SR 49/Cramer Road intersection would result in LOS D conditions, which would satisfy the County's minimum LOS standard.

~~Any intersection improvement that involves stopping traffic on mainline State highways is subject to an additional level of analysis before a decision can be made as to the applicable choice of traffic control.~~

~~Current Caltrans policy requires that an Intersection Control Evaluation (ICE) report be prepared to analyze the best choice among all way stop, traffic signal, or roundabout intersection improvement options. As such, preparation of an ICE report would be required for the SR 49/Cramer Road intersection prior to implementation of improvements.~~

~~Furthermore, funding sources have not been identified for improvements to the SR 49 corridor north of Dry Creek Road. Placer County could elect to identify a strategy for the overall traffic controls in the area and update the Traffic Impact Fee Program to address the local share of improvement costs. However, while future study facilities may contribute their fair share to the cost of SR 49 corridor improvements by paying into the Traffic Impact Fee Program, Placer County cannot guarantee that improvements to the SR 49/Cramer Road intersection would occur. As such, in the absence of feasible mitigation beyond that which is included below, the project's incremental contribution to the cumulatively considerable impact to the SR 49/Cramer Road intersection would remain *cumulatively considerable and significant and unavoidable*.~~

It is important to note that this conclusion is very conservative based on the following actions, which have transpired since the release of the Draft EIR for public review. At the August 14-15, 2019 meeting of the California Transportation Commission (CTC), the SR 49 Safety Improvements Project was approved for inclusion in the 2018 State Highway Operation and Protection Program (SHOPP). The project description states "Near Auburn, from 0.3 mile south of Lorenson Road/Florence Lane to 0.3 mile north of Lone Star Road. Construct concrete median barrier and two roundabouts." Specifically, the roundabouts are planned at Lone Star Road and Lorenson Road, whereas, the median barrier improvement would occur at Cramer Road, in order to restrict the intersection movements to right-turns. The programming includes \$26,340,000 in project funding and anticipates construction beginning in 2022. An initial allocation of \$1.5 million in funding for the Project Approval & Environmental Document (PA&ED) phase was also approved as part of the CTC agenda. As the project was not fully funded at the time of the Draft EIR preparation, it was not assumed under cumulative conditions.

12-10 *Prior to issuance of any Building Permits, future wineries and farm breweries shall be subject to the payment of traffic impact fees that are in effect in the area of development, pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required and shall be paid to Placer County DPWF:*

- A. *County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code*
- B. *South Placer Regional Transportation Authority (SPRTA)*

The fees to be paid shall be based on the fee program in effect at the time that the application is deemed complete. (ESD)

The foregoing revisions are for clarification purposes and do not affect the adequacy of the analysis within the Draft EIR.

Additionally, a response to the recently published court case [*Citizens for Positive Growth & Preservation v. City of Sacramento* (2019)] is included in the revisions to the Transportation and Circulation section of the EIR. Based on this discussion of VMT, beginning on page 10-42 of the EIR, and following Impact Statement 10-5, the EIR, as revised, now conservatively covers analysis of both LOS and VMT.

13. Alternatives Analysis

Since release of the Draft EIR for public review, an inadvertent typographical error has been detected in Section 13.4, Environmentally Superior Alternative, of the Draft EIR, the correction of which will provide demonstrate the adequacy of the Draft EIR’s discussion regarding the environmentally superior alternative. Page 13-16 of the Draft EIR is hereby revised as follows:

With regard to selection of an environmentally superior alternative, Practice Under the California Environmental Quality Act, Second Edition, Vol. 1, states the following:¹

On the basis of the rule that an EIR should include sufficient information to allow a “meaningful evaluation, analysis, and comparison” with the project (15126.6(d)), when none of the alternatives is clearly environmentally superior to the project, it should be sufficient for the EIR to explain the environmental advantages and disadvantages of each alternative in comparison with the project.

Given that the Wedding CUP Alternative and the Reduced Intensity Alternative would result in generally similar environmental impacts, neither alternative is clearly environmentally superior to the other. However, due to the fact that the Wedding CUP Alternative would result in fewer impacts such that mitigation measures identified for the proposed project related to noise would not be necessary, whereas the Reduced Intensity Alternative would still require all the same mitigation measures as the proposed project, the Wedding CUP Alternative would be considered the environmentally superior alternative.

This section of the EIR, then, acknowledges that there is not always a clear environmentally superior alternative to a proposed project, as is the case with the proposed Zoning Text Amendment. Furthermore, while there is no clear environmentally superior alternative to the proposed project, it does not follow that this means the two alternatives result in impacts so similar to the project. The requirement under CEQA is for an alternative to avoid or substantially lessen one or more of the significant effects. The alternatives selected for the proposed project accomplish this basic requirement. Thus, the foregoing revision does not alter the analysis or conclusions within the Draft EIR.

¹ Kostka, Stephen L. and Zischke, Michael H. *Practice Under the California Environmental Quality Act, Second Edition, Vol. 1* [pg. 15 to 43]. Updated March 2018.