



# Placer Retirement Residence

## Final Environmental Impact Report

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Project Number: PLN 16-00298  
State Clearinghouse No. 2017102049

March 2019



**Kimley»Horn**



# PLACER RETIREMENT RESIDENCE EIR

## Final Environmental Impact Report

PROJECT NUMBER: PLN 16-00298

STATE CLEARINGHOUSE NO. 2017102049

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**MARCH 2019**

Prepared By:

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## Contents

<b>1</b>	<b>Introduction and List of Commenters.....</b>	<b>1-1</b>
<b>2</b>	<b>Reponses To Comments.....</b>	<b>2-1</b>
<b>3</b>	<b>Revisions To The Draft EIR Text.....</b>	<b>3-1</b>
<b>4</b>	<b>Mitigation Monitoring and Reporting Program .....</b>	<b>4-1</b>

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## 1.0 INTRODUCTION AND LIST OF COMMENTERS

### 1.1 INTRODUCTION

This Final Environmental Impact Report (EIR) contains agency, organization, and resident comments received during the public review period of the Placer Retirement Residence (proposed project) Draft EIR. This document has been prepared by Placer County, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, Section 15132. The Introduction and List of Commenters chapter of the Final EIR discusses the background of the Draft EIR and purpose of the Final EIR, identifies the comment letters received on the Draft EIR, and provides an overview of the Final EIR's organization.

### 1.2 BACKGROUND

The Draft EIR identified the proposed project's potential impacts and the mitigation measures that would be required to be implemented. The following environmental analysis chapters are contained in the proposed project Draft EIR:

- Aesthetics;
- Air Quality;
- Biological Resources;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Hydrology and Water Quality;
- Land Use;
- Noise;
- Public Services;
- Energy Conservation;
- Transportation and Circulation;

- Cumulative Impacts and other CEQA Sections; and
- Alternatives.

In accordance with CEQA, a Notice of Completion (NOC) of the Draft EIR was published on the Placer County Community Development Resource Agency website, and the Draft EIR was sent to the State Clearinghouse (SCH#: 2017102049) for distribution to State agencies on December 20, 2018 for a 45-day public review period, ending on February 4, 2019. The Draft EIR was also posted on the Placer County website, and printed copies of the document were made available for review at:

1) the Granite Bay Library, located at 6475 Douglas Boulevard, Granite Bay, CA, 2) the Placer County Community Development Resource Agency offices in Auburn, located at 3091 County Center Drive, Auburn, CA, and 3) the County Clerk's Office, located at 2954 Richardson Drive, Auburn, CA. In addition, a public hearing was held on January 24, 2019 to solicit public comments regarding the Draft EIR.

### **1.3 PURPOSE OF THE FINAL EIR**

Under CEQA Guidelines, Section 15132, the Final EIR shall consist of:

1. The Draft EIR or a revision of the Draft.
2. Comments and recommendations received on the Draft EIR.
3. A list of persons, organizations, and public agencies commenting on the Draft EIR.
4. The responses to significant environmental points raised in the review process.
5. Any other information added by the Lead Agency.

As required by CEQA Guidelines, Section 15090(a)(1)-(3), a Lead Agency must make the following three determinations in certifying a Final EIR:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency's independent judgment and analysis.



Under CEQA Guidelines, Section 15091, a public agency shall not approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects. Findings of Fact must be accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The Findings of Fact are included in a separate document that will be considered for adoption by the County's decision-makers.

In addition, pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant and unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence. Here, the proposed project would not result in any project-level or cumulative impacts that would be significant and unavoidable; thus, a Statement of Overriding Considerations is not required.

## **1.4 LIST OF COMMENTERS**

Placer County received 13 comment letters during the public comment period on the Draft EIR for the proposed project. The comment letters were authored by the following agencies:

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### **1.4.1 PUBLIC AGENCIES**

Letter A: California Department of Fish and Wildlife, Angela Calderaro

Letter B: Placer County Air Pollution Control District, Lauren Moore

Letter C: Placer County Flood Control District, Brad Brewer

Letter D: Pacific Gas and Electric Company (PG&E), John Spigott

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### **1.4.2 GROUPS**

Letter E: Granite Bay Community Association, Sandra Harris

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### **1.4.3 INDIVIDUALS**

Letter F: BJ Baker

Letter G: Amber Beckler

Letter H: Cheryl Berkema

Letter I: Larissa Berry, January 13, 2019

Letter J: Larissa Berry, January 23, 2019

Letter K: Larissa Berry, February 3, 2019

Letter L: Holly Johnson

Letter M: Peggy Peterson

Letter N: Shannon Quinn

Letter O: Jeffrey Keith

A public hearing was held on January 24, 2019, with the Placer County Planning Commission. One person commented at the public hearing:

Letter P: Sandra Harris

## **1.5 ORGANIZATION OF THE FINAL EIR**

The Final EIR is organized into the following chapters:

### *Chapter 1: Introduction and List of Commenters*

Chapter 1 of the Final EIR provides an introduction and overview of the document, describing the background and organization of the Final EIR. Chapter 1 also provides a list of commenters who submitted letters in response to the Draft EIR.

### *Chapter 2: Responses to Comments*

Chapter 2 of the Final EIR presents the comment letters received and responses to each comment. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. The response to each comment will reference the comment number.

### *Chapter 3: Revisions to the Draft EIR Text*

Chapter 3 of the Final EIR summarizes changes made to the Draft EIR text in response to comment letters.

#### *Chapter 4: Mitigation Monitoring and Reporting Program*

CEQA Guidelines, Section 15097, requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the EIR for the Placer Retirement Residence project.

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## 2 RESPONSES TO COMMENTS

This chapter contains responses to each of the comment letters submitted regarding the Placer Retirement Residence Draft EIR. Each bracketed comment letter is followed by numbered responses to each bracketed comment. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are either discussed or noted for the record, as appropriate. Where revisions to the Draft EIR text are required in response to the comments, such revisions are noted in the response to the comment and are also listed in Chapter 3 of this Final EIR. All new text is shown as double underlined and deleted text is shown as ~~struck through~~.

The changes to the analysis contained in the Draft EIR represent only minor clarifications/amplifications and do not constitute significant new information or change any of the conclusions of the Draft EIR. In accordance with CEQA Guidelines, Section 15088.5, recirculation of the Draft EIR is not required.

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Letter A - California Department of Fish and Wildlife,  
North Central Region

### Shirlee Herrington

**From:** Calderaro, Angela@Wildlife <Angela.Calderaro@wildlife.ca.gov>  
**Sent:** Friday, January 04, 2019 10:59 AM  
**To:** Placer County Environmental Coordination Services  
**Cc:** Wildlife R2 CEQA  
**Subject:** Comment: Placer Retirement Residence (SCH 2017102049)  
**Attachments:** Folsomquad-BIOSExport.xlsx

Good morning,

The Department of Fish and Wildlife (CDFW) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Placer Retirement Residence Project (project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.

CDFW is California's **Trustee Agency** for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

A-1

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required. CDFW also administers the Native Plant Protection Act, Natural Community Conservation Act, and other provisions of the Fish and Game Code that afford protection to California's fish and wildlife resources.

#### EIR Analysis Methodology

Although the California Natural Diversity Database (CNDDDB) is one tool that may identify potential sensitive resources in the area, the dataset should not be regarded as complete for the elements or areas with the potential to be impacted. Other sources for identification of species and habitats near or adjacent to the project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship (CWHR) System, California Native Plant Society (CNPS) Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations. In addition, CNDDDB is not a comprehensive database. It is a positive detection database. Records in the database exist only where species were detected and reported. This means there is a bias in the database towards locations that have had more development pressures, and thus more survey work. Places that are empty or have limited information in the database often signify that little survey work has been done there. A nine United States Geologic Survey (USGS) 7.5-minute quadrangle search is recommended to determine what may occur in the region (see Data Use Guidelines on the Department webpage

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<https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>). The Biological Resources Report for the EIR states that only the Folsom USGS quad was searched in CNDDDB. CDFW recommends using the 9-quad search results to determine which special-status species have the potential to be impacted by the proposed project. I have attached the 9-quad search from CDFW's BIOS online tool. It identifies 67 special-status species. This list should be reviewed and analyzed. If additional species are identified with the potential to be impacted by the proposed project, then the EIR should be revised to include this analysis. The Department considers adverse project-related impacts to sensitive species and

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habitats to be significant to both local and regional ecosystems, and the EIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

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cont'd

In addition, CDFW recommends changing Mitigation Measure BIO-1a so that if any special-status plant species is found, avoidance zones shall be established around the plants.

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#### **Lake and Streambed Alteration Agreement Program**

Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. The EIR incorrectly assumes that Fish and Game Code 1600 only applies to areas with an active surface flow at the time of the surveys. CDFW disagrees with the delineation of the riparian area and thinks it expands beyond what is delineated in Figure 4.3-1. In addition, the placement of the trail over the creek and in the riparian area as shown in Figure 3-3, the removal of riparian trees as shown in Figure 4.3-3, and the installation of the culvert to accommodate the trail in the "upland" portion of the riparian habitat in the southeastern portion of the project site would require that the entity notify the Department for a Lake or Streambed Alteration (LSA) Agreement. In addition, if stormwater drains or detention basins are placed in the riparian area, they may also require notification under Fish and Game Code 1600.

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Upon receipt of a complete notification, CDFW will determine if the proposed project activities may substantially adversely affect existing fish and wildlife resources and whether an LSA Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain an LSA notification package, please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

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Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

Mitigation Measure BIO-4 states that in the event the Placer County Conservation Program is adopted, then the applicant does not need to obtain the necessary permits for impacts to wetlands, waters of the US or streams. They would still need to notify the Department and mitigate for the loss of sensitive habitat. CDFW recommends revising the last paragraph on page 4.3-75.

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The EIR should also identify whether the ongoing operation and maintenance of the project would impact the biological resources within and surrounding the project site. For instance, if the trail and culverts would have to be maintained

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then how would it impact the stream form and function. The additional stormwater runoff from increased impervious surfaces on the project site should be evaluated in terms of how it affects the stream downstream from the project site and the species that rely on this habitat.

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cont'd

#### Cumulative Analysis

The cumulative effects of the project are not mitigated to a less-than-significant level by the simple adherence to federal and state laws and regulations. Impacts to special-status species extend beyond what is regulated by the federal and state Endangered Species Acts. For one not all special-status species are covered under these acts, and two, they are regulations to be used as a last ditch effort to save those species on the brink of extinction. The CEQA document should evaluate effects to common as well as special-status species at a local, regional, and state level. All too often, CDFW receives complaints regarding the downstream effects to biological resources from increased urban development. Without proper analysis during the CEQA environmental review process, these downstream effects go unmitigated. For instance, although annual grassland is not considered to be a sensitive habitat type, the cumulative effect of the loss of this habitat locally, regionally and statewide can have far-reaching effects on both common and special-status species as well as other valuable environmental resources like groundwater percolation, open space, deer habitat, and wildflowers for bee pollination. Although the environmental impacts to a project may be less than significant at a project level, they may cumulative significant given all the development in a region. This particular area surrounding the project site does not have a lot of open space left. The stream onsite is continually being degraded by surrounding development and urban use for recreation and stormwater runoff. This can have cumulative effects to the stream that cannot be mitigated elsewhere. CDFW recommends that the County consider these impacts in their cumulative effects analysis when approving this and other projects in the area.

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#### Conclusion

Pursuant to Public Resources Code §21092 and §21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to [r2CEQA@wildlife.ca.gov](mailto:r2CEQA@wildlife.ca.gov).

CDFW appreciates the opportunity to comment on the EIR for the Placer Retirement Residence to assist in identifying and mitigating project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts.

Please let me know if you have any questions or concerns.  
Thank you,

#### Angela Calderaro

Senior Environmental Scientist (Specialist)  
Habitat Conservation Branch  
California Department of Fish and Wildlife, North Central Region  
1701 Nimbus Road, Rancho Cordova CA 95670  
Office: 916-767-3993  
Fax: 916-358-2912  
[Angela.Calderaro@wildlife.ca.gov](mailto:Angela.Calderaro@wildlife.ca.gov)  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

To report a violation please notify the Californians Tum in Poachers and Polluters (CalTIP) program by calling 1-888-DFG-CalTip (1-888-334-2258) or texting "tip411" (numerically, 847411 – Start message with "CalTip") You can even send photos via text. Also, the CalTIP App can be downloaded for free via the Google Play Store and iTunes App Store.

Please note my phone number has been updated.

## **Response to Letter A – California Department of Fish and Wildlife (CDFW)**

A-1 Comment noted. No changes were made to the EIR based on this comment.

A-2 The biological resources analysis in the EIR is not based solely on CNDDDB files or the files of any single database. Section 4.3 of the EIR references the site specific biological resources reports prepared for the project by qualified biologists. The project specific reports include: a Biological Resources Assessment (ECORP Consulting, 2018); included as Appendix C to the EIR, an Arborist Report (ECORP Consulting); included as Appendix D to the EIR, a Tree Risk Assessment Report (Up A Tree Arborist Services, 2018); included as Appendix E to the EIR, and a Delineation of Waters of the U.S. (ECORP Consulting 2016); included as Appendix F to the EIR.

With regard to reviewing multiple sources for special status species within or in the vicinity of the project site, Section 4.3 of the EIR notes the following species lists that were used:

- CDFW CNDDDB for the "Folsom, California" 7.5-minute USGS quadrangle (CDFW 2018).
- USFWS IPaC Trust Resources Report (USFWS 2018).
- CNPS electronic Inventory of Rare and Endangered Plants of California was queried for the "Folsom, California" 7.5-minute USGS quadrangle, and the 9 surrounding USGS topographic quadrangles (2018).

In addition, pedestrian surveys of the site were conducted by professional biologists on April 1, and July 14, 2016.

Based on the analysis in the biological resources report, no additional special status species were determined to have a potential to exist onsite based on lack of suitable habitat. The list of 67 species provided by CDFW from a 9-quad search were reviewed and compared to the list of species evaluated in the EIR. Based on the list of species covered in the Biological Resources Assessment and included as Table 4.3-2 of the EIR, of the 67 species from the 9-quad search 40 of the species were evaluated in the EIR. Of the remaining species, those species were not considered to be potentially occurring due to lack of suitable habitat.

The project site and the surrounding area have been disturbed by past agricultural use and residential development. The project site is bordered on two sides by two major transportation corridors within the Granite Bay Community Plan Area. For the reasons listed above, no changes were made to the EIR based on this comment.

- A-3 Impacts on special status species are potentially significant and that mitigation measures should be required. No additional special status species beyond those already identified and analyzed in the EIR have been identified that would require changes to the EIR. The EIR includes Mitigation Measures BIO-1a through BIO-1f for the specific purpose of minimizing and avoiding sensitive species (specifically, Sanford's Arrowhead, Western Pond Turtle, Nesting Birds, Swainson's Hawk and Swainson's Hawk nests, and Pallid Bat) during construction activities. No additional special status species (plant or animal species) have been identified by review of the supplemental information provided by CDFW (i.e., 9 quad species list) that would require changes to the EIR. Other mitigation measures are required for wetland and tree impacts. No additional mitigation measures have been identified or required. No changes were made to the EIR based on this comment.
- A-4 Mitigation Measure BIO-1a has been revised in the Final EIR to include avoidance zones established around any special-status species plants. The revision is shown in double-underline:

**BIO-1a: Preconstruction Survey – Sanford's Arrowhead.** Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:

A focused plant survey according to USFWS, CDFW, and CNPS protocols shall be performed by a qualified biologist to the satisfaction of the Placer County Planning Services Division. The plant survey shall occur during the blooming period for Sanford's arrowhead (May through November). If Sanford's Arrowhead is not found, no further action is needed. However, if grading does not begin within three years after the survey is complete, a second survey must be completed prior to grading.

If Sanford's arrowhead or any special-status plant species is found, avoidance zone(s) shall be established around the plant(s) to demarcate the areas not to be disturbed. The USFWS, CDFW, and the Placer County Planning Services Division shall be notified immediately, and specific avoidance zones shall be determined by a qualified biologist in consultation with CDFW and USFWS.

If Sanford's arrowhead or any other special status plant species is found and avoidance is not possible, a plan to incorporate additional measures such as seed collection and/or translocation shall be developed and implemented to the satisfaction of CDFW or USFWS personnel prior to additional work within the established avoidance zone.

This change represents a minor clarification and amplification of the existing mitigation measure and does not change any conclusions in the EIR or result in any new or more significant impacts.

A-5 Comment noted. This comment is informational in nature and not in conflict with the content in the EIR. No changes were made to the EIR based on this comment.

A-6 The EIR acknowledges that riparian habitat is protected by Section 1600 of the Fish and Game Code (Table 4.3-3; Policy 6.B.1 Analysis, Table 4.3.4; Policy 5.3-3 Analysis, and page 4.3-84 under the heading Riparian Areas and Wetlands). Mitigation measures BIO-4 through 7 set up a framework that ensures impacts to aquatic resources will be mitigation at a 1:1 ratio through a mitigation bank. The final determination of a given agencies' jurisdiction would be finalized through the regulatory permit process.

No changes were made to the EIR based on this comment.

A-7 The riparian area was delineated by a qualified biologist familiar with the region and biological resources. The comment does not provide any evidence or discussion of why the riparian area should be expanded.

The County acknowledges that impacts to riparian habitat, including riparian trees, would require the applicant to notify CDFW for a Lake and Streambed Alteration Agreement for the portion of the multi-use path that will space the Linda Creek Tributary. Mitigation Measure BIO-4 in the EIR requires the applicant demonstrate that wetland permits, including permits from CDFW are obtained prior to any equipment staging, clearing, grading, or excavation work related to that multi-use path crossing of the Linda Creek Treelake Tributary.

It should be noted that the proposed multi-use path will span the Linda Creek Treelake Tributary and no new culverts are proposed within the tributary. No changes were made to the EIR based on this comment.

A-8 Comment noted. This comment is informational in nature and not in conflict with the content in the EIR. No changes were made to the EIR based on this comment.

A-9 Based on the context of the comment, this response assumes the commenter is referring to Mitigation Measure BIO-4 on page 4.3-73 of the EIR. The mitigation language has been changed to include notification of the regulatory agencies in the case of the PCCP adoption; revision is shown in double-underline:

**Mitigation Measure BIO-4: Wetland Permits.** Prior to the approval of improvement plans, the applicant shall provide, to the satisfaction of the Development Review Committee (DRC), evidence that the U. S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the Central Valley Regional Water Quality Control Board

(RWQCB) have been notified by certified letter regarding the existence of wetlands on the property. Any permits required shall be obtained and copies submitted to DRC prior to any equipment staging, clearing, grading, or excavation work.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project. **The applicant must still notify the regulatory agencies listed above and obtain the applicable wetland permits.**

This change represents a minor clarification and amplification of the existing mitigation measure and does not change any conclusions in the EIR or result in any new or more significant impacts.

- A-10 The daily operations of the proposed project and daily activities of future residents would have little impact on biological resources onsite. The proposed building is located outside of the riparian area, and no building, parking area, residential activity area, or maintenance areas are proposed within the riparian habitat. Furthermore, the project has been designed to avoid the only sensitive habitat onsite, the riparian habitat area.

With regard to stormwater runoff from the site, Chapter 4.6 of the EIR evaluates water quality and hydrology impacts. Page 4.6-34 of the EIR notes that the use of a water quality swales, landscaped buffer areas, and bioretention basins, would ensure water runoff is sufficiently treated before flowing off-site. Low Impact Design (LID) and Best Management Practices (BMPs) incorporated as design elements would ensure that the proposed project would not result in an increase in associated offsite erosion, siltation, and would reduce surface water pollution exiting the project site. Implementation of Mitigation Measure HYD-1, would ensure compliance with these water quality protection measures and that BMPs are incorporated into the final design of the project. Further, implementation of additional Mitigation Measures HYD-2 through HYD-4 would reduce potential impacts on water quality to less than significant.

The project includes bio-retention basins to treat and control the release of stormwater into the tributary. As shown in Table 4.6-4, the project would result in an increase in flows offsite as result of changes in impervious surface. The EIR concludes the changes in volume and flow would not be substantial such that the downstream flows are anticipated to be significantly altered. The proposed development would not significantly change the location where stormwater flows enter or exit the project site. The Placer County Flood Control and Water Conservation District Update to the Dry Creek

Watershed Flood Control Plan dated November 2011 suggests that detention is not required within the Dry Creek watershed unless increases in stormwater peak flows negatively impact downstream facilities. No impacts on downstream facilities have been identified. The final design of the drainage facilities will be reviewed and approved by the County through the implementation of Mitigation Measures HYD-5 and HYD-6. No impacts on biological resources have been identified as a result of changes to downstream flows.

For these reasons, the project operations would not have a significant impact on biological resources within and surrounding the project site. The EIR concluded that potential impacts on biological resources would be less than significant with mitigation incorporated. No changes were made to the EIR based on this comment.

- A-11 The EIR acknowledges that cumulative development in the area would result in the construction of new buildings and structures in the general project vicinity. These projects would result in the loss and fragmentation of wildlife habitats, loss of wildlife migration corridors, loss of oak woodlands, impacts to streams and wetlands, and possible impacts on nesting migratory birds and special-status species. The EIR has analyzed the project's contribution to the impacts of cumulative projects and has determined that the project's contribution to cumulative impacts here is not cumulatively considerable under CEQA.

It should be noted that the majority of the proposed project site has been previously disturbed and most of the native vegetation on the site has been removed. The sensitive habitat that remains on the project site has been avoided through the project design (with the exception of a small area for a pathway crossing) and will remain undisturbed. The applicant has proposed a roadway improvement design that would substantially reduce wetland and riparian impacts compared to what is recommended in the Granite Bay Community Plan. The project site is an infill site that is bordered on two sides by major roadways and significant residential development. A third side of the proposed project site is bordered by rural residential homes. By locating new development on sites already surrounded by development cumulative impacts are minimized because it reduces the direct impact associated with loss of habitat and indirect edge effects on biological resources associated development on undisturbed land, including to wildlife species not covered under existing state and Federal law. The overall area has experienced development and the proposed project would have an incremental cumulative impact but not a significant, unavoidable cumulative impact.

For these reasons the potential for cumulative impacts on biological resources associated with the project are not cumulatively considerable. No changes were made to the EIR based on this comment.

- A-12 Please see Response A-10 above regarding the analysis of stormwater effects of the project. No changes were made to the EIR based on this comment.

- A-13 Downstream effects of the project have been thoroughly analyzed in the EIR, including cumulative effects. Specifically, the proposed project has addressed these issues at the project level through the project design. As noted in response A-11, the project has been designed to avoid the onsite riparian areas, with the exception of the onsite path and bridge that would cross the bridge. The bridge itself is proposed as a span bridge designed to minimize impacts to the maximum extent possible. The project is proposing an alternative road frontage design that would ensure the stream channel is intact and the existing, mature native trees would remain. The project has been designed to reduce impacts to sensitive biological resources and therefore would also reduce cumulative impacts to these resources. The stream would be avoided by the proposed project.

The project proposes bio-retention basins that will allow stormwater runoff to infiltrate into the ground back to the groundwater table. The project has been designed such that the tributary and riparian area are left intact and that the development is setback from the riparian habitat. As noted in the EIR, the project site is not considered a wildlife corridor as the project site is situated at the intersection of Sierra College Boulevard and Old Auburn Road, an urbanized intersection with regular vehicular traffic. As a result, wildlife movement is limited by these roadways. The project includes a robust landscaping plan that includes native trees and shrubs that will provide opportunities for bee pollination.

Please see Response A-10 regarding the design and mitigation measures that have been incorporated into the project to minimize impacts on the creek habitat onsite. Potential cumulative impacts as a result of the proposed project are considered not cumulative considerable. No changes were made to the EIR based on this comment.



Letter B - Placer County Air Pollution Control District



110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • [www.placerair.org](http://www.placerair.org)

Erik C. White, Air Pollution Control Officer

January 25, 2019

Ms. Shirlee Herrington  
Environmental Coordination Services  
Placer County Community Development Resource Agency  
3091 County Center Drive  
Auburn, CA 95603

Subject: Review of the Draft Environmental Impact Report for the Placer Retirement Residence

Dear Ms. Herrington:

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Placer Retirement Residence (Project). The District has the following comments on the Project's DEIR for your consideration.

1. The Carbon Monoxide section (page 4.2-29) incorrectly references the District's recommendation for CO hotspot analysis. The District's *CEQA Air Quality Handbook* recommends the following criteria to determine if a CO hotspot analysis is warranted:

When a project's CO emissions from vehicle operation are more than 550 lbs/day and if a project would degrade any intersection in the project vicinity from an acceptable peak-hour LOS to unacceptable LOS or if a project would substantially worsen an already existing unacceptable LOS on any intersection in the project vicinity<sup>1</sup>.

While the proposed Placer Retirement Residence is not predicted to emit over 550 lbs/day of CO and therefore the impact would remain "less than significant", the District recommends the following changes for accuracy:

"According to the PCAPCD, CO concentrations should be analyzed at intersections in the project vicinity **when a project's CO emissions from vehicle operation are more than 550 lbs/day and either** the level of service (LOS) would be degraded from acceptable (i.e., A, B, C, or D) to unacceptable (i.e., E or F), **or the** project would result in the addition of traffic that would substantially worsen (delay of 10 seconds or more) already unacceptable intersections."

2. The Cumulative Impacts section (page 4.2-32) incorrectly states that the District does not recommend a cumulative threshold of significance for PM<sub>10</sub>. The District recommends a

<sup>1</sup> Placer County Air Pollution Control District CEQA Air Quality Handbook, Section 4.4 "Determining Local CO Emission Impact at Roadway Intersection", page 37, published in August 2017  
<http://www.placerair.org/~media/apc/documents/planning/land%20use%20and%20ceqa/ceqahandbook/chapter4-2017ceqahandbook.pdf?la=en>



Ms. Shirlee Herrington  
January 25, 2019  
Page 2 of 3

cumulative-level, operational phase threshold of 82 lbs/day of PM<sub>10</sub>.<sup>2</sup>

3. The Operation-Related Emissions section (page 4.5-24) states that:

"The project's long-term operational emissions are summarized in *Table 4.5-5: Operational Greenhouse Gas Emissions*. As shown, operation of the proposed project would generate approximately 730 MTCO<sub>2</sub>e per year."

However, the referenced table shows that the proposed project would generate 846 MTCO<sub>2</sub>e per year, not 730 MTCO<sub>2</sub>e per year:

Table 4.5-5: Operational Greenhouse Gas Emissions

Source	Total MTCO <sub>2</sub> e per year
Area	221
Energy	163
Mobile	400
Waste	34
Water	28
Total	846

The District recommends reconciling this discrepancy and ensuring that data throughout the DEIR is consistent with the CalEEMod analysis found in Appendix B of the DEIR.

4. The Approach to Alternatives Analysis section (page 6-3) incorrectly states that the District's construction threshold for ROG is 55 lbs/day. The District's construction threshold for ROG, as provided in the District's *CEQA Air Quality Handbook*, is 82 lbs/day<sup>3</sup>.

The Approach to Alternatives Analysis section also states that the DEIR requires mitigation to reduce construction impacts to a less than significant level:

"Construction activities associated with the proposed project would generate reactive organic gases (ROG) emissions at a level that would exceed the Placer County Air Pollution Control District (PCAPCD) significance threshold of 55 pounds per day. Therefore, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to a **less than significant level**."

However, Table 4.2-7: Construction Emissions in the Air Quality section (page 4.2-20) shows that the ROG emissions from construction are less than the District's threshold of 82 lbs/day

<sup>2</sup> Placer County Air Pollution Control District CEQA Air Quality Handbook, Section 2.3 "Significance Determination for Criteria Pollutant Impacts," page 22, published in August 2017.

<http://placerair.org/~media/apc/documents/planning/land%20use%20and%20ceqa/ceqahandbook/chapter2-2017ceqahandbook.pdf?la=en>

<sup>3</sup> Placer County Air Pollution Control District CEQA Air Quality Handbook, Section 2.2 "District Adopted Significance Thresholds for Criteria Pollutants," page 16, published in August 2017.

<http://placerair.org/~media/apc/documents/planning/land%20use%20and%20ceqa/ceqahandbook/chapter2-2017ceqahandbook.pdf?la=en>

Ms. Shirlee Herrington  
January 25, 2019  
Page 3 of 3

and would therefore not *require* mitigation to be considered less than significant. While mitigation would not be required in this case, the District supports any additional mitigation measures implemented to ensure that ROG emissions remain less than significant.

The District recommends clarifying whether the Project's construction emissions will require mitigation to be considered less than significant and what mitigation will be implemented, if any.

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please feel free to contact me at 530-745-2376 or [lmoore@placer.ca.gov](mailto:lmoore@placer.ca.gov).

Sincerely,



Lauren Moore  
Air Pollution Control Specialist  
Placer County Air Pollution Control District

Cc: Yushuo Chang, Planning and Monitoring Section Manager

B-4  
*cont'd*

## Response to Letter B – Placer County Air Pollution Control District

- B-1 Comment noted. The text on page 4.2-29 of the EIR has been revised as follows (changes shown in ~~striketrough~~ and double underline text):

According to the PCAPCD, CO concentrations should be analyzed at intersections in the project vicinity ~~if~~ when a project's CO emissions from vehicle operations from vehicle operation are more than 550 lbs/day and either the level of service (LOS) would be degraded from acceptable (i.e., A, B, C, or D) to unacceptable (i.e., E or F), and if a or the project would result in the addition of traffic that would substantially worsen (delay of 10 seconds or more) already unacceptable intersections.

This change represents a minor clarification and amplification of the existing analysis and does not change any conclusions in the EIR or result in any new or more significant impacts.

- B-2 Comment noted. The text on page 4.2-32 of the EIR has been revised as follows (changes shown in ~~striketrough~~ and double underline text):

According to the PCAPCD, in the case that operational emissions attributable to the project are below the cumulative threshold of significance of 55 pounds per day of ROG, or 55 pounds per day NOX, or 82 pounds per day for PM10, and the project's contribution to impacts would be considered less than cumulatively considerable. The PCAPCD does not recommend cumulative thresholds of significance for ~~PM10 or~~ CO emissions. In addition, PCAPCD does not recommend cumulative thresholds of significance for construction emissions.

This change represents a minor clarification and amplification of the existing analysis and does not change any conclusions in the EIR or result in any new or more significant impacts.

- B-3 Comment noted. The text on page 4.5-24 of the EIR has been revised as follows (changes shown in ~~striketrough~~ and double underline text):

The project's long-term operational emissions are summarized in *Table 4.5-5: Operational Greenhouse Gas Emissions*. As shown, operation of the proposed project would generate approximately ~~730~~ 846 MTCO<sub>2e</sub> per year. Therefore, emissions would not exceed the PCAPCD De Minimis Level and no further analysis is required.

This change was required in only one location. This change represents a minor clarification and amplification of the existing analysis and does not change any conclusions in the EIR or result in any new or more significant impacts.

- B-4 Comment noted. The text on page 6-3 of the EIR has been revised as follows (changes shown in ~~striketrough~~ and double underline text):

***Air Quality.*** The EIR determined that implementation of the proposed project would result in less than significant impacts in regard to air quality. Construction activities associated with the proposed project would generate reactive organic gases (ROG) emissions at a level that would not exceed the Placer County Air Pollution Control District (PCAPCD) significance threshold of ~~55~~ 82 pounds per day. Therefore, no mitigation is required and potential impacts are considered less than significant. ~~the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to a less than significant level.~~

This change represents a minor clarification of the existing analysis and does not change any conclusions in the EIR or result in any new or more significant impacts.



PLACER COUNTY  
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Letter C - Placer Flood Control and  
Water Conservation District

Ken Grehm, Executive Director  
Brian Keating, District Manager  
Brad Brewer, Development Coordinator

February 4, 2019

Shirlee Herrington  
Placer County  
Planning Services Division  
Community Development Resource Agency  
3091 County Center Drive  
Auburn, CA 95603

**RE: Placer County Retirement Residences (PLN16-00298), DEIR**

Shirlee:

We have reviewed the Draft Environmental Impact Report (DEIR) dated December 2018 for the subject project and have the following comments:

- a) Please have the applicant update the analyses discussions in Policies 4.E.11 and 4.E.12 to reflect the findings within the Preliminary Drainage Report in Appendix H. We observed the calculations within this report show that peak discharges will be increased from the site.
- b) Please have the applicant update the discussion on Page 4.6-39 in the Stormwater Drainage and Surface Runoff discussion regarding Significance Criteria 4.6-5. We observed the 10-year and 100-year total peak flows listed were inconsistent with those listed in Table 4.6-3.

C-1  
C-2

Please call me at (530) 745-7541 if you have any questions regarding these comments.

Brad Brewer, MS, PE, CFM, QSD/P  
Development Coordinator

t:\dpw\ford\development review\letters\planning\cn 19-18 placer co retirement residence deir.docx

3091 County Center Drive, Suite 220 / Auburn, CA 95603 / Tel: (530) 745-7541 / Fax: (530) 745-3531

**Response to Letter C – Placer County Flood Control and Water Conservation District**

- C-1: The comment refers to Table 4.6-1 and the General Policy discussion regarding Policies 4.E-11 and 4.E-12. Peak discharges will be increased from the site. The text on page 4.6-20 of the EIR under Policy 4.E-11 has been revised as follows (changes shown in ~~strikethrough~~ and double underline text):

The project is consistent with this policy. The proposed drainage system that includes bioretention basins, landscape swales, LID features and BMPs would ~~reduce~~ result in increases of peak discharges of approximately 16.3 percent for a 10-year storm and 14.6 percent for a 100-year storm from the site. The Placer County Flood Control and Water Conservation District Update to the Dry Creek Watershed Flood Control Plan dated November 2011 suggests that detention is not required within the Dry Creek watershed unless increases in stormwater peak flows negatively impact downstream facilities. The increase in peak discharges generated from the project drain directly into the Linda Creek Treelake Tributary located onsite. The timing of the peak discharges generated from the smaller onsite watersheds are anticipated to occur earlier compared to the peak discharges for the larger Linda Creek Treelake Tributary watershed. Therefore, the peak discharges for the Linda Creek Treelake Tributary are not expected to realize increases that would negatively impact downstream facilities.

The text on page 4.6-20 of the EIR under Policy 4.E-12 has been revised as follows (changes shown in ~~strikethrough~~ and double underline text):

The project is consistent with this policy. The proposed drainage system that includes bioretention basins, landscape swales, LID features and BMPs would ~~reduce~~ result in increases of peak discharges of approximately 16.3 percent for a 10-year storm and 14.6 percent for a 100-year storm from the site. The Placer County Flood Control and Water Conservation District Update to the Dry Creek Watershed Flood Control Plan dated November 2011 suggests that detention is not required within the Dry Creek watershed unless increases in stormwater peak flows negatively impact downstream facilities. The increase in peak discharges generated from the project drain directly into the Linda Creek Treelake Tributary located onsite. The timing of the peak discharges generated from the smaller onsite watersheds are anticipated to occur earlier compared to the peak discharges for the larger Linda Creek Treelake Tributary watershed. Therefore, the peak discharges for the Linda Creek Treelake Tributary are not expected to realize increases that would negatively impact downstream facilities.

These changes represent minor clarification and amplification of the existing analysis and do not change any conclusions in the EIR or result in any new or more significant impacts.

- C-2: The peak flows listed in Table 4.6-3 are correct. The text on page 4.6-39 of the EIR has been revised as follows (changes shown in ~~striketrough~~ and double underline text):

As shown in *Table 4.6-3: Pre-Development Peak Flow Summary*, the project site has total 10-year and 100-year peak flows of ~~17.5~~ 15.9 cubic feet per second (cfs), and ~~35.4~~ 31.5 cfs, respectively.

This change represents a minor clarification and amplification of the existing analysis and does not change any conclusions in the EIR or result in any new or more significant impacts.



**Plan Review Team**  
Land Management

Letter D - PG&E  
PGEPlanReview@pge.com  
6111 Bollinger Canyon Road 3370A  
San Ramon, CA 94583

February 4, 2019

Ms. Shirlee Herrington  
Placer County  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Re: Placer Retirement Residence PLN16-000298  
3905 Old Auburn Road, Roseville

Ms. Herrington:

Thank you for giving us the opportunity to review the subject plans. The proposed Placer Retirement Residences project is within the same vicinity of PG&E's existing facilities that impact this property. PG&E has overhead electrical distribution facilities installed on a portion of the parcel in question by way of an easement acquired by PG&E.

Please contact the Building and Renovation Center (BRSC) for facility map requests at [BRSCSSR@pge.com](mailto:BRSCSSR@pge.com) and PG&E's Service Planning department at [www.pge.com/cco](http://www.pge.com/cco) for any modification or relocation requests, or for any additional services you may require. However, please note that any relocation requests would have to be accompanied by a proposal for equivalent land rights to be granted to PG&E and the cost of said relocation would be borne by the requestor.

Finally, a copy of this letter and DEIR has been sent to PG&E's environmental department for review.

If you have any questions regarding our response, please contact me at [john.spigott@pge.com](mailto:john.spigott@pge.com).

Sincerely,

A handwritten signature in black ink, appearing to read "John Spigott".

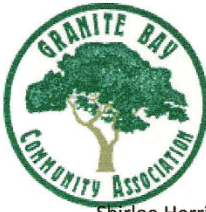
John Spigott  
Land Management  
925-328-5122

D-1



## **Response to Letter D – Pacific Gas and Electric Company (PG&E)**

- D-1     Comment noted. This comment is informational in nature. No changes were made to the EIR based on this comment.



## GRANITE BAY COMMUNITY ASSOCIATION

P.O. BOX 2704 ★ GRANITE BAY, CALIFORNIA 95746 ★ (916) 791-7427

Shirlee Herrington, Environmental Coordination Services  
Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
January 30, 2001  
VIA EMAIL – [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)  
Re: DEIR for Placer retirement Residence Project

**SANDRA HARRIS**  
ISSUES COORDINATOR

The following comments are in response to the above:

Project Objective – The project objective to serve the local community (GB) doesn't meet objectives of the GBCP. This facility introduces a 3 story building into the community, and provides yet another facility for seniors when there are already at least 8 major large senior facilities, a 16 unit facility in the process, and more than 30 private homes scattered throughout the community where seniors are cared for. In addition, a large number of Granite Bay residents plan to age in their homes and not seek such a facility. The WellQuest (Ovation) directly across Sierra College from this proposal will begin construction soon for 114 residents. Does this proposal truly serve the needs of Granite Bay residents (about 21,000) when most of Placer County population is located west of Granite Bay? The need for another facility of this type in Granite Bay should be further studied.

E-1

Except for not having cooking facilities in each unit (easily overcome with a microwave oven) the facility is basically an apartment building and belongs in commercial zoning. At some time in the future, if this type of facility isn't profitable would it be repurposed to an apartment building? This should be addressed.

E-2

Fire Service - This facility does not offer medical care but caters to elders in late 70s and 80s. This population probably has the most medical needs. With the ability of each resident to contact 911, the probability of extensive medical calls is a reality. When an ambulance responds, a fire truck is also dispatched. This facility is at the extreme edge of the South Placer Fire District (SPFD). The district has 2 ambulances – one stationed at the far northwest of the district on Auburn-Folsom Road and the other at the Olive Ranch station which is about the middle of GB. When both are tied up, AMR responds. Increased response times could put Granite Bay residents in need of immediate medical care at risk. This parcel is zoned for 3 dwelling units. The facility proposes 160. That is a huge increase of population with a concentration of older residents who will have medical needs. The DEIR really only looked at fire response times, but did not consider medical response times and the impacts to Granite Bay residents. More study should be done to insure that the fire district is made whole for calls to this facility, how the calls will be prioritized if no medical staff is available on site to determine need for ambulance service, and impacts on medical service to Granite Bay residents to insure residents are not put in jeopardy.

E-3

E-4

Respectfully submitted,

*Sandra Harris, Secretary*  
Granite Bay Community Association

**Response to Letter E – Granite Bay Community Association**

- E-1 The comment doesn't state which objectives of the project are in conflict with the objectives of the Granite Bay Community Plan. The EIR provides an analysis of the relevant Placer County General Plan and Granite Bay Community Plan goals and policies as part of the analysis in each resource section of the Chapter 4 of the EIR.

Chapter 5 of the EIR includes a cumulative analysis of reasonable foreseeable proposed, current and past projects in the surrounding area in Chapter 5.5 of the EIR. In addition, Chapter 4.7.4, Land Use, evaluates the cumulative impacts of the proposed residential care homes in Granite Bay. Page 4.7-6 of the EIR includes a discussion of the project's consistency with the General Plan and Granite Bay Community Plan goals and policies.

With regard for the need for the project in Granite Bay, the County notes that the comment provides background and does not raise any environmental issue within the context of the California Environmental Quality Act (CEQA). The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.

- E-2 This comment is speculative and unrelated to any environmental issue. The County has reviewed the project with regard to the existing County zoning requirements and has found that, with the adoption of the proposed zone re-classification, the project is consistent with the County's zoning code. The proposed zone re-classification is to RA-B-100 (Residential Agriculture, Combining Minimum Building Site of 100,000 Square Feet). Apartments are defined as "residential multi-family" which is not an allowed land use in the RA-B-100 zone district. Proposed changes to the use of the building would be required to obtain additional entitlements and review under the California Environmental Quality Act.

No changes were made to the EIR as a result of this comment.

- E-3 The closest South Placer Fire District (SFPD) fire station to the project site is Station 15 located at 4650 East Roseville Parkway approximately 1.5 miles to the northeast. Station 15 has an Advanced Life Support (ALS) engine, and an engine for wildland fires (grass truck) and is staffed 24 hours by three full-time employees, one of whom is required to be advanced life support qualified.

The second closest fire station to the project site is Station 17 located at 6900 Eureka Road approximately 4.3 miles east of the project site. Station 17 has an ambulance, ladder truck, and an engine for fighting wildland fires. Station 17 is staffed with 5 full-time employees.

Chapter 4.9.3 of the EIR evaluates potential impacts on fire protection as it relates to the need for new facilities. The EIR notes that while additional demand generated by the

proposed project would result in an incremental increase in demand for fire protection services, the project would not result in the need for new fire protection facilities. The County of Placer collects a fire mitigation fee at the time of building permit issuance on behalf of the SPFD. These fees are used to fund planned improvements in accordance with SPFD's adopted Capital Facilities Plan. Impacts on fire protection services are considered less than significant.

Operational and funding decisions of the SFPD are governed by the SPFD Board of Directors and are not an environmental issue within the context of CEQA. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.

- E-4 The project does not propose 160 residential units. The project proposes 145-congregate living suites that are expected to accommodate 160 people. The discussion on page 4.9-16 of the EIR outlines project operations designed to minimize emergency medical response times. Table 4.9-1: General Plan Goals and Policies – Public Services contains an analysis regarding the project's consistency with applicable goals and policies addressing emergency response times and concluded the project is consistent with these policies. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.

Letter F - BJ Baker

**Shirlee Herrington**

**From:** Bj <bjmakesithappen@aol.com>  
**Sent:** Sunday, January 13, 2019 8:22 PM  
**To:** Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Keding-  
 Cecil  
**Subject:** Strongly opposed to Whitehawk Development in Granite Bay

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

F-1

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

F-2

CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300."

F-3

The County has "dumped" 3 DEIR's upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.

F-4

The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

F-5

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

F-6

Thank you in advance for your consideration of my request.

BJ Baker

Waterford II HomeOwners Assoc.

Assistant Secretary

**Response to Letter F – BJ Baker**

- F-1 The EIR was released for public review on December 20, 2018 for a 45-day review period consistent with the State CEQA Guidelines. The public review ended on February 4, 2019. No extension of time was granted for the EIR public review period. No changes were made to the EIR as a result of this comment.
- F-2 Comment noted. This comment is regarding another EIR unrelated to the proposed project. No changes were made to the EIR as a result of this comment.
- F-3 Comment noted. This comment is informational in nature and is not in conflict with the content of the EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- F-4 Comment noted. No further response is required because the comment does not raise any environmental issues. The EIR was prepared in accordance with CEQA guidelines and provides a level of analysis commensurate with the proposed project. No changes were made to the EIR as a result of this comment.
- F-5 Comment noted. The EIR for the proposed project was reviewed by County staff for its content and format regarding the proposed project. County staff determined that the EIR analysis is appropriate to inform the public and decision-making bodies of the potential environmental impacts of the project. This remainder of this comment is regarding another EIR unrelated to the proposed project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- F-6 Comment noted. Please see Response F-5.



**Shirlee Herrington**

**From:** Amber Beckler <zagnut@hotmail.com>  
**Sent:** Sunday, January 13, 2019 4:04 PM  
**To:** Shirlee Herrington; EJ Ivaldi; CRSchimd@placer.ca.gov; Crystal Jacobsen; KKeding@placer.ca.gov  
**Subject:** Request for extension on WH I and II

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300."

The County has "dumped" 3 DEIR's upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.

The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the



documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

G-1  
*cont'd*

Thank you in advance for your consideration of my request.

Thank you,

Amber Beckler  
8970 Benton Acre Rd  
Granite Bay, CA 95746

## **Response to Letter G – Amber Beckler**

- G-1 The content of this letter is same text as that provided in Letter F. As such, the reader is referred to the responses to Letter F. No changes to the EIR were made as result of this comment.

Letter H - Cheryl Berkema

**Shirlee Herrington**

**From:** Cheryl Berkema <cheryl.berkema@gmail.com>  
**Sent:** Monday, January 14, 2019 11:56 AM  
**To:** Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Keding-  
 Cecil; Clayton Cook  
**Subject:** Request for extension of Environmental Document Reviews

Good morning,

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released at the same time for public review and input: The Sunset Area Plan/Placer Ranch Specific Plan, Placer County Government Center Master Plan Update, WhiteHawks I & II DEIR, and Placer Retirement Residence DEIR. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

Several residents have expressed concerns with the timing of multiple environmental documents, the excessive length of the documents, the complexity of the environmental documents, and Placer hearings scheduled so close to religious holidays. Resident appeals to postpone the documents and extend these document deadlines has also been expressed in public meetings. In addition to the environmental documents released at the same time, the WhiteHawks Planning Hearing, the Zoning Text Amendment Board of Supervisors Hearing and Tiny Houses on Wheels Board of Supervisors hearing were scheduled placing heavy burden on residents.

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

**CEQA 15141 states:** "The text of draft EIRs should normally be **less than 150** pages and **for proposals of unusual scope** or complexity should normally be **less than 300**."

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of

the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

H-1  
cont'd

Thank you in advance for your consideration of my request,

Cheryl Berkema

## **Response to Letter H – Cheryl Berkema**

- H-1     The content of this letter is same text as that provided in Letter F. As such, the reader is referred to the responses to Letter F. No changes to the EIR were made as result of this comment.

**Shirlee Herrington**

**From:** Larissa Berry <lzberry@peoplepc.com>  
**Sent:** Sunday, January 13, 2019 2:40 PM  
**To:** Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedingen-Cecil; Clayton Cook  
**Cc:** Ashley Brown; GBCA; defendgb@gmail.com; AEL-Leslie Warren  
**Subject:** Time extension request for upcoming DEIRs

Good evening,

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

**CEQA 15141 states:** "The text of draft EIRs should normally be **less than 150** pages and for proposals of unusual scope or complexity should normally be **less than 300.**"

The County has "dumped" 3 DEIR's upon the public in an unreasonable timeframe. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.

The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

I-1  
conf'd

Thank you in advance for your consideration of my request,

Larissa Berry

**Response to Letter I – Larissa Berry, January 13, 2019**

- I-1      The content of this letter is same text as that provided in Letter F. As such, the reader is referred to the responses to Letter F. No changes to the EIR were made as result of this comment.



Letter J - Larissa Berry

**Shirlee Herrington**

**Subject:** FW: Comments for PC meeting tomorrow regarding Placer Retirement Residences

-----Original Message-----

From: Larissa Berry [<mailto:lberry@peoplepc.com>]

Sent: Wednesday, January 23, 2019 1:24 PM

To: Sue Colbert

Subject: Comments for PC meeting tomorrow regarding Placer Retirement Residences

Good Afternoon Ms Colbert,

I am in the process of going through the exceedingly lengthy Placer Retirement Residences DEIR and unfortunately will not be attending the hearing tomorrow to make public comments. If you could please forward an unusual premiss within the DEIR which the Commissioners may wish to have clarified sooner than later, it would be appreciated.

J-1

The DEIR claims 80% of the residents will be from outside Granite Bay therefore only 34 residents would be added to the GB population count. I am unclear how the remaining residents are able to magically utilize distinct and separate public services such as sewer capacity and Emergency Responders.

J-2

The name of the facility uses the word "Residences", which distinctly implies being part of the population. Perhaps this could addressed as well as why the population county being used is from 2010? I believe Supervisor Uhler has presented more recent numbers at a previous MAC meeting.

J-3

Thank you in advance.

Larissa Berry

Sent from my iPhone

## **Response to Letter J – Larissa Berry, January 23, 2019**

- J-1      Comments regarding document length are also addressed in Letter F. As such, the reader is referred to the Response F-5. No changes to the EIR were made as result of this comment.
- J-2      Page 3-7 of the EIR states that approximately 80 percent of the residents of the proposed project would come from within 10 miles of the project site. This could include communities within and outside of Granite Bay. The EIR evaluated potential impacts on public services in Chapter 4.9 of the EIR. Potential impacts on public services including sewer capacity and emergency services (fire and police protection) were determined to be less than significant. No changes to the EIR were made as result of this comment.
- J-3      Comment noted. The population numbers used in the EIR are consistent with those used in the County's General Plan adopted in 2012. No changes to the EIR were made as result of this comment.

Letter K - Larissa Berry

**Shirlee Herrington**

**From:** Larissa Berry <lzberry@peoplepc.com>  
**Sent:** Sunday, February 03, 2019 6:51 PM  
**To:** Shirlee Herrington  
**Cc:** EJ Ivaldi; Megan Wood; GBCA; defendgb@gmail.com; AEL-Leslie Warren; Ashley Brown  
**Subject:** Re: Placer Retirement Residence (PLN16-00298), Draft Environmental Impact Report released for 45-day public review/comment

Please accept the following comments on the Placer Retirement Residences Draft EIR.

Additionally note, CEQA considers 100 pages for a simple project and 300 pages for a complicated project, this DEIR FAR exceeds either guideline. This makes for a poor document to appropriately communicate impacts to the community without overburdening the public; the intent of an EIR (DEIR).

K-1

## PLACER RETIREMENT RESIDENCES:

The project by definition does indeed NOT meet an acceptable land use under the Granite Bay Community Plan so should be rejected. The facility is Senior Housing not a residential care facility.

K-2

Should the applicant choose to proceed "at his own risk", there are several glaring inconsistencies and inadequacies within the DEIR.

K-3

The Population count used in the NOP was 22,387, it should be corrected rather than using 2010 population numbers or updated. Supervisor Uhler presented a roof top count placing the population over 25,000 which did not include the recently approved 56 homes from The Park at Granite Bay and the Ovations Assisted Living at that same intersection. Updated numbers would allow residents to more effectively comment on the facilities impact on our Buildout of 26,000.

K-4

The Park at Granite Bay EIR indicated that the sewer trunk was at capacity and the City of Roseville had denied conveyance. How will this project mitigate the increase of 1,600% over planned? The sewer capacity study is not to be completed until late 2019 and cumulative impacts of Ovations and The Park at Granite Bay need to be addressed.

K-5

There is an internal conflict in the DEIR in that the project is for the benefit of the community and yet only 20% of the residents are from Granite Bay. Logic dictates that this is for the benefit of other communities and not Granite Bay.

K-6

The DEIR fails to address "why" residents of the facility are not included in the headcount. If they are residents, then they utilize public services of the facility; therefore, they are headcount.

K-7

The project proposes over 9% paved parking area. Studies indicate that anything over 9% paving creates a feeling of non-residential. How will this impact the immediately adjacent and contiguous **residential** parcels? K-8

Parking spaces allotted are inadequate for a population which is transitional. What percentage of residents do they anticipate will have vehicles? K-9

The DEIR fails to provide any statistics on use of emergency responders. The impacts on this service must be evaluated in a cumulative fashion with the recently approved Ovation facility. K-10

To ensure the health, safety and wellbeing of the Granite Bay Community, the impacts of a 3 story building which requires service by a ladder truck for emergency responses need to be verified as compliant with National Fire Safety Standards K-11

The DEIR fails to provide a "viable" lower impact alternative. Economic feasibility of a project are not grounds for establishing an alternative with less impact. By the graphics provided, the 2 and 3 story alternatives have virtually identical silhouettes. Since they are virtually identical, the 2-story analysis cannot have less aesthetic impact. What is being implied is project **mass** not **height**. A single-family residence of 36 feet (allowed) would have no impact. Therefore, an alternative with fewer number of units must be analyzed. The project is not requesting a height variance; therefore, height cannot be an aesthetic issue. Should the applicant choose to proceed with identical aesthetic projects, it would make resident comments easier if the DEIR clearly stated the total square feet of both footprints since the 2 story foot-print would be larger, additional evidence that a 2-story alternative is not viable and needs to be re-drafted. K-12

SWQP for drainage due to in the significant increase in impervious surface into adjacent waterways need to be further investigated. K-13

The project makes no mention of required off-site easements for public services, this needs to be clarified. K-14

The project is adjacent and/or include in identified commercial orchards per historic aerial photographs. Soil testing should be done to determine if pockets of DDT and breakdown components of this pesticide are present as per OSHA and CDC requirements of testing up to 100 years in areas with arid climates. This is due to sequestering of pockets of the pesticide which does not degrade in anaerobic conditions. No soil testing at levels of grading were conducted. K-15

Thank you for your consideration of my comments

Larissa Berry

-----Original Message-----  
From: Shirlee Herrington

**Response to Letter K – Larissa Berry, February 3, 2019**

- K-1 Comment noted. The EIR was reviewed by County staff for its content and format regarding the proposed project. County staff determined that the EIR analysis is appropriate to inform the public and decision-making bodies of the potential environmental impacts of the project. No changes were made to the EIR as a result of this comment.
- K-2 The project is a residential care home as described in Chapter 3.5 of the EIR. The project is consistent with the definition of a residential care home as defined by Section 17.040.030 of the Placer County Code. The residential care home is consistent with the proposed zoning. The applicable goals and policies of the Granite Bay Community Plan were evaluated for the project in Table 4.7-3 of the EIR. No conflicts were identified. No changes were made to the EIR as a result of this comment.
- K-3 Comment noted. The comment does not raise any environmental issue within the context of the California Environmental Quality Act (CEQA). No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- K-4 Comment noted. The population numbers used in EIR are consistent with those used in the County's General Plan adopted in 2012. No changes to the EIR were made as result of this comment.
- K-5 A sewer capacity analysis was prepared for the project and submitted to County and the City of Roseville for review. The analysis determined that the existing sewer system had adequate capacity for the proposed project. As a condition of approval, the project applicant will be required to pay a fair share contribution to the construction of a new sewer lift station to serve the proposed project and other existing and proposed developments in the area. No changes to the EIR were made as result of this comment.
- K-6 Comment noted. The comment does not raise any environmental issue within the context of the California Environmental Quality Act (CEQA). No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- K-7 An evaluation of public services is included in Chapters 4.9 of the EIR. The EIR evaluates the impact on public facilities for all the residents in the residential care home. Potential impacts on public services were determined to be less than significant. No changes were made to the EIR as a result of this comment.
- K-8 The EIR evaluated potential impacts on the surrounding community in Chapters 4.1: Aesthetics and 4.7: Land Use which describe the project design including setbacks from the property lines. No changes were made to the EIR as a result of this comment.

- K-9 Comment noted. A discussion of parking facilities for the proposed project is provided on page 3-19 of the EIR. The proposed project is providing 101 parking spaces, which exceeds the required parking ratio of for residential care homes, one space per every 2 persons cared for, as set forth in Section 17.54.060(B)(5) of Placer County Code. The comment does not raise any environmental issue within the context of the California Environmental Quality Act (CEQA). No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- K-10 Please see Response E-3.
- K-11 Comment noted. The project would be built to all required fire safety standards and the building plans are required to be reviewed and approved by the South Placer Fire District prior to the issuance of a building permit. The SPFD has reviewed the project and confirmed that the District has fire equipment capable of serving a three-story building. No changes were made to the EIR as a result of this comment.
- K-12 Chapter 6 of the EIR contains an alternatives analysis of Alternative 2: Development Under Existing Zoning. Under this alternative, the project would consist of the development of 3 single-family lots which would be a smaller project than the proposed project. Alternative 2 was rejected because it failed to meet any of the project objectives. Alternative 3: Two-Story Alternative provides an analysis of a two-story project and includes Table 6-1 (page 6-16) in Chapter 6 of the EIR, which is a comparison of the proposed project and Alternative 3. As shown in Table 6-1, a 2-story alternative would have a 35% larger building footprint than the proposed project. The analysis presented in Chapter 6 notes on Page 6-14 that though Alternative 3 would have fewer stories, the total number of units would be unchanged in order to retain the project's feasibility. Per CEQA Guidelines Section 15126.6(f)(1): Feasibility: "...among the factors that may be taken into account when addressing the feasibility of an alternatives are...economic viability..." As such, Alternative 3 was rejected because it would only partially satisfy Project Objective 3 and would not satisfy Objective 5 and Objective 6. Alternative 3 would result in increased visual impacts which is inconsistent with Objective 6. No changes were made to the EIR as a result of this comment.
- K-13 The EIR evaluates potential increases in surface water runoff in Chapter 4.6. Potential impacts were determined to be less than significant with the incorporation of mitigation measures. No changes were made to the EIR as a result of this comment.
- K-14 No offsite easements for public services are required for the proposed project. No changes were made to the EIR as a result of this comment.
- K-15 Hazardous materials were addressed in the Initial Study/Environmental Checklist as part of the Notice of Preparation (NOP) process. The NOP and initial study are included as Appendix A to the EIR. The following information is provided in the Environmental Checklist regarding the presence of hazardous materials:

The project site is not on any list compiled pursuant to Government Code Section 65962.5 (the “Cortese List”) (DTSC, 2014). The nearest listed site is the Roseville Railyards site located approximately 3.5 miles northwest of the project site. Additionally, a review of aerial imagery dating from 1938 was performed for the purpose of determining whether the site was ever used for crop production. The review of these images found no evidence of land manipulation, rows of crops or orchard trees, or drastic changes in the vegetation structure that are typically discernible on aerial photographs when crop production has occurred over a significant period of time. Because the project site is not listed on any list of hazardous material sites and there is no evidence of previous uses that would have contaminated the project site, the proposed project would have no impact related to hazardous materials sites. Impacts associated with both proposed frontage improvement alternatives regarding being located on a listed hazardous materials site are the same. The analysis above is discussed in terms of the proposed project and is applicable to both alternatives. Impacts would be the same as above and no impact would occur. No further analysis of this issue is required in the EIR.

Furthermore, a Phase I Environmental Site Assessment<sup>1</sup> was prepared for the project to assess the potential for the presence of materials (including pesticides) on or near the proposed project site. The report was prepared to the federal ASTM E 1527-13 Standard Practice and did not identify any evidence of hazardous materials known as Recognized Environmental Conditions (RECs) under the ASTM Standard. The report included a review of aerial photographs from 1938 to 2012 and no evidence of commercial orchards on the project site or adjacent properties were noted. No changes were made to the EIR as a result of this comment.

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<sup>1</sup> Clearwater Environmental Resources, LLC., March 3, 2016. Approximate 8.2-Acre Undeveloped Parcel, 3805 Old Auburn Road, Placer County, California, Phase I Environment Site Assessment. This report is available at the Placer County Community Development Resource Agency Counter, at 3091 County Center Drive, Auburn, California 95603.



Letter L - Holly Johnson

**Shirlee Herrington**

**From:** hollyjesq@aol.com  
**Sent:** Monday, January 14, 2019 11:09 AM  
**To:** Placer County Environmental Coordination Services  
**Cc:** Christopher Schmidt  
**Subject:** Re: Whitehawk I and II - Draft EIR - ADDITIONALLY Placer Retirement Residence Draft EIR and Cumulative Projects

Thank you.

It should also be noted that there are several draft EIRs that have been released recently by Placer County, whereby individually and cumulatively they are exceeding the page limitation and the burden placed on the public to adequately respond, which is not reasonable. Request is hereby made for the extension of time to respond to these projects and proposed revisions. My understanding is that the documents and projects proposed include, but are not limited to, Whitehawk I and II; Sunset Area Plan; Placer Retirement Residence draft EIR; Tiny Houses proposed amendments to the Placer County Code; Placer Ranch; Sunset Industrial Area/Placer Ranch draft EIR; and proposed Zoning Text Amendments to the Placer County Code.

L-1

Further, the Placer Retirement Residence draft EIR exceeds the page limitation set forth in regulation under CEQA. The offices associated with licensing and the facilities are closed due to the shutdown. Impacts for the Sunset Industrial Area/Placer Ranch project are far reaching and of significant impact on the entire county. The project will destroy thousands of acres of farmlands, wetlands, endangered species and add to traffic corridors with 10,000 additional homes without providing adequate affordable housing. Information from departments involved in affordable housing and destruction of endangered species are closed due to the federal government shutdown and, as a result, the public is denied access at this time to critical information that would allow pertinent statements.

L-2

L-3

It is respectfully submitted that there be an extension of time to respond to these projects. Please allow the public to adequately respond to the numerous projects and voluminous documents set forth by Placer County, and for the County to comply with federal and state mandates.

L-4

Thank you,

Holly Johnson

-----Original Message-----

From: Placer County Environmental Coordination Services <[CDRAECS@placer.ca.gov](mailto:CDRAECS@placer.ca.gov)>  
 To: Holly <[hollyjesq@aol.com](mailto:hollyjesq@aol.com)>  
 Cc: Christopher Schmidt <[CRSchmid@placer.ca.gov](mailto:CRSchmid@placer.ca.gov)>  
 Sent: Mon, Jan 14, 2019 10:24 am  
 Subject: RE: Whitehawk I and II - Draft EIR

Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. Also, you are on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities to for public participation and input.

Thanks.

.....  
 Shirlee Herrington  
 Community Development Technician  
 Environmental Coordination Services  
 Placer County Community Development Resource Agency  
 3091 County Center Drive, Suite 190, Auburn, CA 95603



**Response to Comment Letter L – Holly Johnson**

- L-1     The EIR was released for public review on December 20, 2018 for a 45-day review period consistent with the State CEQA Guidelines. The public review ended on February 4, 2019. No extension of time was granted for the EIR public review period. No changes were made to the EIR as a result of this comment.
- L-2     Please see Response F-5 regarding the length of the EIR.
- L-3     Comment noted. This comment is informational in nature and is not in conflict with the content of the EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- L-4     Comment noted. Please see Response L-1.

Letter M - Peggy Just Peterson

**Shirlee Herrington**

**From:** Peggy Peterson <peggyjust@yahoo.com>  
**Sent:** Sunday, January 13, 2019 5:23 PM  
**To:** Shirlee Herrington; ejevaldi@placer.ca.gov; Christopher Schmidt; Crystal Jacobsen; Kally Keding-Cecil  
**Subject:** Request for comment deadline extension

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIRs recently released.

M-1

Comments for WHI and II are due by 5:00 pm 1/14. This is a MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totaling roughly 80 homes. CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300." The County has "dumped" 3 DEIRs upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIRs appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs. The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, and as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

M-2

M-3

M-4

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the date for review should be extended to afford the community its guaranteed right to comment.

M-5

Thank you in advance for your consideration of my request,

Peggy Just Peterson  
 Granite Bay, CA

**Response to Letter M – Peggy Peterson**

- M-1 Comment noted. Regarding the extension of time, the EIR was released for public review on December 20, 2018 for a 45-day review period consistent with the State CEQA Guidelines. The public review ended on February 4, 2019. No extension of time was granted for the EIR public review period.
- M-2 The remainder of this comment is about another project unrelated to the proposed project and is not in conflict with the content of the EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- M-3 Please see Response F-5 regarding the length of the EIR.
- M-4 This comment is about another project unrelated to the proposed project and is not in conflict with the content of the EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- M-5 Please see Responses F-5 and M-1.

**Kally Keding-Cecil**

**From:** Shannon Quinn <shannoncts@gmail.com>  
**Sent:** Monday, February 4, 2019 1:56 PM  
**To:** Shirlee Herrington; Kally Keding-Cecil  
**Subject:** Comments on Placer Retirement Residence (PLN16-00298), Draft Environmental Impact Report

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Shirlee-

Please consider these comments in response to the Placer Retirement Residence (PLN16-00298), Draft Environmental Impact Report. I have the following questions, comments and concerns, and I respectfully request they be addressed by the County.

1. This project is not within zoning compliance. This facility is a "Congregate Care Facility" providing non-medical services requiring no licensing and is therefore not an allowable usage under Res Ag Zoning. This project by definition meets the definition in our zoning ordinance of a "senior housing project, which are multi-family residential projects where occupancy is limited to people of fifty-five (55) years or older. Senior Housing Projects include Senior Independent Living Centers (SILC) and senior apartments. Senior Independent Living Centers means a senior housing project that consists of, but is not limited to, individual apartment units, community dining centers, and common recreation". Senior Housing Projects are NOT ALLOWED in residential single-family zoning (RS) nor residential agricultural zoning (RA). They are multi-family residential projects and belong in multi-family zoning. This project MUST be in compliance with zoning. Therefore criteria 4.7.2 is a SIGNIFICANT IMPACT which cannot be mitigated without a compliant rezone.

N-1

The Placer County Zoning Ordinance defines residential care homes as follows "any family home, group care facility, or similar facility as determined by the director, providing for twenty four hour non medical care of persons in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual." This does not meet those requirements and will place the project in violation of Code 65852 by "allowing a usage on land not allowed under County ordinance". The county is not allowed to create forms of zoning disuniformity they otherwise lack authority to create.

N-2

**Of interest to note:**

Congregate Care Facility by definition "is typically for residents 55 years of age or older, where limited or no assistance with daily living activities is needed and a state issued license is not required. With senior housing booming, novice and experienced operators alike are on the hunt for quality investments. Assisted living facilities, skilled nursing facilities and independent living facilities are among the most popular choices for senior housing operators and investors. Congregate care facilities are the type of senior housing that should be considered if the operator or investor is looking for less government oversight and minimal staffing requirements"

N-3

2. Traffic- interestingly enough also utilizes trip counts for a "congregate care facility"

N-4

a. Roadway segment on Old Auburn between Sierra College and County line should be evaluated and was left out of the analysis. Currently this segment is included in the Granite Bay Capital Improvement Plan as designated on the complete Northside of Old Auburn between Sierra College and the county line- estimated cost is \$990.2 but is relying on funding of \$876.9 from "other funding not identified". If this segment is in the GB CIP the impacts of 294 daily trips to this segment would be a required review.

N-5

b. Peak Hour Factor (PHF) should use the actual for each roadway segment and intersection not a default value of .92/.94 without explanation of.

N-6

c. The Cumulative Conditions calculations rely on mitigation to the surrounding area provided for in the Granite Bay Capital Improvement Plan such as Douglas Blvd widening to 6 lanes between Sierra College to Cavitt and all lanes of Sierra College widened to 6 lanes. There is not currently funding within the GB CIP at this time for these improvements, therefore planned mitigation to the impacts of our roadways should not be included in these cumulative calculations as they are reflecting inaccurate projections.

N-7

d. Presumably the discussion of the "residential shuttle" is to help reduce traffic impacts by helping to get the "high functioning seniors" out of individual vehicles, so will the maintenance and utilization of this be a requirement in the conditions of approval? If they fail to have a shuttle 2 years from now because they don't find it economically feasible what happens? Who follows up to make sure that both the manager and assistant manager obtain and maintain Class B licenses with passenger endorsements to operate said shuttle?

N-8

### 3. Emergency Services-

a. A breakdown of ACTUAL response times and INTENDED call volume for this facility in relation to South Placer Fire must be discussed. A WIL SERVE letter stating that they will attempt to adhere to county policy is not sufficient to say that EMS delivery will not be adversely affected. South Placer Fire currently utilizes 2 ambulances- based on a recent review of these units they are quite often being called out of the Granite Bay area to assist neighboring jurisdictions under mutual aid agreements. What have recent call volumes been at the newly added Country Manor or long time Eskaton Village at Granite Bay. Without an analysis this impact cannot be deemed less than significant.

N-9

b. Are there any provisions in place if this facility exceeds certain call volumes or any training to prevent potential abuse?

N-10

c. The determination that 80% of all residents will come from our community conflicts in the document itself- sometimes the wording is "neighboring communities" and other times it is "existing community"- which is it? And what defines "neighboring"? Furthermore this document that the DEIR replies on titled "Senior Overview & Demand Analysis" which was paid for by the applicant Hawthord Development states on its own cover page "Information contained herein has been obtained from multiple sources and is believed to be substantially correct, but is not guaranteed to be so." leaves little reassurance to this reader. It seems like it would be more prudent under worst case scenario to assume that all 130 will be new Granite Bay residents and evaluate those potential EMS impacts accordingly.

N-11

This same report tries to draw a correlation that there are 6607 Seniors over the age of 65 within a 3 mile radius which is interesting when all of Granite Bay only has a total of 1742 over this age. Again, highly speculative to say that 80% of all residents will be from Granite Bay.

N-12

### 4. Population-

Total households 7632 based on a recent rooftop count by the Department of Public Works. US Census data shows an estimated average of 3.3 per household, which would put us at 25,185. Granite Bay has a holding capacity of 26,000 so a Cumulative analysis should be included in this DEIR. Based on ACT counts between 2015 to 2016 Granite Bay grew from 22,387 to 22,840. For the first time in many years Eureka School District began experiencing an expanding enrollment as of 2016- this would imply that our population is growing and the effects of increasing density have the potential to create impacts and therefore should be included for evaluation. Multiple new projects are in the pipeline and have the potential to be a significant impact when evaluated cumulatively. Again, because the study trying to determine how many residents will be from our area "is believed to be substantially correct, but is not guaranteed to be so" a better approach would be to factor it as 130 new residents and proceed from there.

N-13

Thank you for your consideration and the opportunity to provide input.

Sincerely,  
Shannon Quinn

## Response to Letter N – Shannon Quinn

N-1 The project is a residential care home as described in Chapter 3.5 of the EIR. The project is consistent with the definition of a residential care home as defined by Section 17.040.030 of the Placer County Code. The residential care home is consistent with the proposed change in zoning classification from Residential Single-Family (RS-AG-B-100) to Residential Agriculture (RA-B-100) and removing the Agricultural combining district.

The project proposes 145 congregate living suites and does not propose any senior apartments or individual apartment units. No changes to the EIR were made as a result of this comment.

N-2 The comment does not identify how the project does not meet the residential care home requirements under the Placer County Zoning Code. County staff has reviewed the project application for consistency with the County Zoning Code and determined that the project would be consistent with the zoning upon approval of the requested change in zoning from Residential Single-Family (RS-AG-B-100) to Residential Agriculture (RA-B-100) and removing the Agricultural combining district. No changes to the EIR were made as a result of this comment.

N-3 Comment noted. This comment is informational in nature and is not in conflict with the content of the EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.

N-4 The trip generation rate used in Table 4.10-7 in Chapter 4.10 of the EIR uses the “Congregate Care Facility” trip generation rate included in the Institute of Transportation Engineers (ITE) Trip Generation Manual. This land use is defined as “...independent living developments that provide centralized amenities such as dining, housekeeping, transportation and organized social/recreational activities...” which is consistent with the project description included in the EIR. As such, the trip generation estimates are appropriate for the proposed project. The comment does not identify any new or more significant impacts are a result of this ITE Land Use Code.

N-5 The segment of Old Auburn Road east of the project access is within the influence area of the signalized Sierra College Boulevard and Old Auburn Road intersection and has been analyzed as part of the signal operations. For the segment of Old Auburn Road west of the project access, the project’s impact is determined based on Placer County’s Impact Analysis Methodology of Assessment memorandum. This memorandum states that the project would trigger a significant roadway segment impact if the project adds 100 ADT or more per lane. Because this segment of Old Auburn Road is two lanes, the project would need to add more than 200 ADT to trigger an impact. Placer Retirement Residences

is forecasted to add 74 ADT to this segment, which does not meet this threshold and therefore does not trigger an impact.

As noted on page 4.10-29 of the EIR, the project is required to pay traffic impact fees that are in effect for the Granite Bay Area. No changes were made to the EIR as a result of this comment.

- N-6 As noted on page 4.10-3 of the EIR, the roadway segments were evaluated using the County's adopted Roadway Segment Assessment Methodology.

With regard to the Peak Hour Factor, the traffic analysis employs a "global" peak hour and "global" peak hour factor (PHF) for intersections along corridors and in zones where intersections are clustered together in close proximity. The peak hour is identified based on the total traffic at all intersections in that zone. The global PHF is calculated by dividing the total peak hour traffic volume for the zone by the peak 15-minute traffic flow for the zone, per the PHF formula. This results in a global PHF of 0.92 in the AM peak hour and 0.94 in the PM peak hour for the intersections along Sierra College Boulevard and a PHF of 0.92 for the project driveway intersection, which does not exist today.

In response to the comment, Kimley-Horn conducted spot analyses of intersections where the individual intersection PHF was lower than the global PHF used in the analysis. The resulting change in delay was no more than 2.5 seconds and did not result in a change in LOS.

The comment did not identify any new or more significant impacts to roadway segments. No changes were made to the EIR as a result of this comment.

- N-7 The cumulative analysis follows the County's standard methodology for evaluating traffic impacts. All projects currently identified in Table 9.6.3 of the Circulation Element of the Granite Bay Community Plan (GBCP) which add capacity to the roadway network are currently included in the Granite Bay Capital Improvement Program (CIP) and funding has been identified. Funding amounts included in the CIP are planning level estimates based on construction costs for similar projects and include an annual inflationary adjustment. Projects that are not included in the CIP include shoulder widening, which does not provide additional capacity, and specific signal projects which the Community Plan designates a desire to avoid. Improvements that are not included in the CIP have not been assumed in the cumulative analysis. In addition to the Granite Bay CIP, the South Placer Regional Transportation Authority (SPRTA) program funds transportation projects which have been identified as regionally serving improvements including the widening of Sierra College Boulevard to 6-lanes within the study area. No changes were made to the EIR as a result of this comment.

- N-8 The residential shuttle is considered an amenity for the residents of the proposed project. The traffic analysis did not include use of the shuttle as a means of reducing the number of traffic trips. Class B licenses are a requirement of the existing State motor vehicle laws

and are enforced by local and State law enforcement. No changes were made to the EIR as a result of this comment.

N-9 Please see Response E-3. No changes were made to the EIR as a result of this comment.

N-10 Please see Response E-3. No changes were made to the EIR as a result of this comment.

N-11 As noted on page 4.9-16 of the EIR, information regarding the location from which future residents of the proposed project are anticipated to come is for informational purposes only and does not affect the analysis of public services in the EIR. This information is provided for context only regarding project operations and does not have an effect as to whether new or expanded fire protection facilities are required to serve the project. Potential impacts on fire protection services was determined to be less than significant. No changes were made to the EIR as a result of this comment.

N-12 Comment noted. Page 3-13 of the EIR notes that approximately 80 percent of the residents are expected to come from the surrounding community which could include other areas beside Granite Bay. No further response is required because the comment does not raise any environmental issues. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No changes were made to the EIR as a result of this comment.

N-13 Comment noted. The project evaluated the project based on 160 residents. The Senior Overview and Demand Analysis was not used in any of the technical analysis for the EIR. As noted in the response above it was provided in the document for information purposes only to provide context regarding the demographics of the proposed project. The population numbers used in the EIR are consistent with those used in the County's adopted General Plan. No changes were made to the EIR as a result of this comment.



Letter O - Jeffrey Keith

**Kally Keding-Cecil**

**From:** J Keith <jeffkeith2@gmail.com>  
**Sent:** Monday, February 4, 2019 2:28 PM  
**To:** Shannon Quinn  
**Cc:** Shirlee Herrington; Kally Keding-Cecil  
**Subject:** Re: Comments on Placer Retirement Residence (PLN16-00298), Draft Environmental Impact Report

To Whom It May Concern,

I endorse and sign onto the comments and questions made by Ms Quinn. Please consider these comments as my response to the Placer Retirement Residence (PLN16-00298), Draft Environmental Impact Report. This proposed project is nothing more than an age restricted apartment building that serves meals and is inappropriate and out of character for the community on proposed site.

O-1

Jeffrey Keith  
 3621 Petite Creek Ct, Granite Bay, CA 95661

On Mon, Feb 4, 2019 at 1:55 PM Shannon Quinn <[shannoncts@gmail.com](mailto:shannoncts@gmail.com)> wrote:  
 Shirlee-

Please consider these comments in response to the Placer Retirement Residence (PLN16-00298), Draft Environmental Impact Report. I have the following questions, comments and concerns, and I respectfully request they be addressed by the County.

1. This project is not within zoning compliance. This facility is a "Congregate Care Facility" providing non-medical services requiring no licensing and is therefore not an allowable usage under Res Ag Zoning. This project by definition meets the definition in our zoning ordinance of a "senior housing project, which are multi-family residential projects where occupancy is limited to people of fifty-five (55) years or older. Senior Housing Projects include Senior Independent Living Centers (SILC) and senior apartments. Senior Independent Living Centers means a senior housing project that consists of, but is not limited to, individual apartment units, community dining centers, and common recreation". Senior Housing Projects are NOT ALLOWED in residential single-family zoning (RS) nor residential agricultural zoning (RA). They are multi-family residential projects and belong in multi-family zoning. This project MUST be in compliance with zoning. Therefore criteria 4.7.2 is a SIGNIFICANT IMPACT which cannot be mitigated without a compliant rezone.

The Placer County Zoning Ordinance defines residential care homes as follows "any family home, group care facility, or similar facility as determined by the director, providing for twenty four hour non medical care of persons in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual." This does not meet those requirements and will place the project in violation of Code 65852 by "allowing a usage on land not allowed under County ordinance". The county is not allowed to create forms of zoning disuniformity they otherwise lack authority to create.

**Of interest to note:**

**Congregate Care Facility** by definition "is typically for residents 55 years of age or older, where limited or no assistance with daily living activities is needed and a state issued license is not required. With senior housing booming, novice and experienced operators alike are on the hunt for quality investments. Assisted living facilities, skilled nursing facilities and independent living facilities are among the most popular choices for

senior housing operators and investors. Congregate care facilities are the type of senior housing that should be considered if the operator or investor is looking for less government oversight and minimal staffing requirements"

2. Traffic- interestingly enough also utilizes trip counts for a "congregate care facility"

a. Roadway segment on Old Auburn between Sierra College and County line should be evaluated and was left out of the analysis. Currently this segment is included in the Granite Bay Capital Improvement Plan as designated on the complete Northside of Old Auburn between Sierra College and the county line- estimated cost is \$990.2 but is relying on funding of \$876.9 from "other funding not identified". If this segment is in the GB CIP the impacts of 294 daily trips to this segment would be a required review.

b. Peak Hour Factor (PHF) should use the actual for each roadway segment and intersection not a default value of .92/.94 without explanation of.

c. The Cumulative Conditions calculations rely on mitigation to the surrounding area provided for in the Granite Bay Capital Improvement Plan such as Douglas Blvd widening to 6 lanes between Sierra College to Cavitt and all lanes of Sierra College widened to 6 lanes. There is not currently funding within the GB CIP at this time for these improvements, therefore planned mitigation to the impacts of our roadways should not be included in these cumulative calculations as they are reflecting inaccurate projections.

d. Presumably the discussion of the "residential shuttle" is to help reduce traffic impacts by helping to get the "high functioning seniors" out of individual vehicles, so will the maintenance and utilization of this be a requirement in the conditions of approval? If they fail to have a shuttle 2 years from now because they don't find it economically feasible what happens? Who follows up to make sure that both the manager and assistant manager obtain and maintain Class B licenses with passenger endorsements to operate said shuttle?

3. Emergency Services-

a. A breakdown of ACTUAL response times and INTENDED call volume for this facility in relation to South Placer Fire must be discussed. A WIL SERVE letter stating that they will attempt to adhere to county policy is not sufficient to say that EMS delivery will not be adversely affected. South Placer Fire currently utilizes 2 ambulances- based on a recent review of these units they are quite often being called out of the Granite Bay area to assist neighboring jurisdictions under mutual aid agreements. What have recent call volumes been at the newly added Country Manor or long time Eskaton Village at Granite Bay. Without an analysis this impact cannot be deemed less than significant.

b. Are there any provisions in place if this facility exceeds certain call volumes or any training to prevent potential abuse?

c. The determination that 80% of all residents will come from our community conflicts in the document itself- sometimes the wording is "neighboring communities" and other times it is "existing community"- which is it? And what defines "neighboring"? Furthermore this document that the DEIR replies on titled "Senior Overview & Demand Analysis" which was paid for by the applicant Hawthord Development states on its own cover page "Information contained herein has been obtained from multiple sources and is believed to be substantially correct, but is not guaranteed to be so." leaves little reassurance to this reader. It seems like it would be more prudent under worst case scenario to assume that all 130 will be new Granite Bay residents and evaluate those potential EMS impacts accordingly.

This same report tries to draw a correlation that there are 6607 Seniors over the age of 65 within a 3 mile radius which is interesting when all of Granite Bay only has a total of 1742 over this age. Again, highly speculative to say that 80% of all residents will be from Granite Bay.

4. Population-

Total households 7632 based on a recent rooftop count by the Department of Public Works. US Census data shows an estimated average of 3.3 per household, which would put us at 25,185. Granite Bay has a holding capacity of 26,000 so a Cumulative analysis should be included in this DEIR. Based on ACT counts between 2015 to 2016 Granite Bay grew from 22,387 to 22,840. For the first time in many years Eureka School District began experiencing an expanding enrollment as of 2016- this would imply that our population is growing and the effects of increasing density have the potential to create impacts and therefore should be included for evaluation. Multiple new projects are in the pipeline and have the potential to be a significant impact when evaluated cumulatively. Again, because the study trying to

determine how many residents will be from our area "is believed to be substantially correct, but is not guaranteed to be so" a better approach would be to factor it as 130 new residents and proceed from there.

Thank you for your consideration and the opportunity to provide input.

Sincerely,  
Shannon Quinn

**Response to Letter O – Jeffrey Keith**

- O-1 Please see responses to comments in Letter N. No changes were made to the EIR as a result of this comment.

Letter P - EIR Public Comment Hearing

**CERTIFIED COPY**

COMMUNITY DEVELOPMENT RESOURCE AGENCY

PLANNING SERVICE DIVISION

County of Placer

January 24, 2019

Reported by: LaCreisha Vaughn, CSR #13945

RE: PLACER RETIREMENT RESIDENCE DRAFT EIR

1	Hearing Date: January 24, 2019	
2	Item No: 3	
3	Time: 10:50	
4	Subject: Placer Retirement Residence (Pln1-00298) Draft	
5	Environment Impact Report - Public Review and Comment	
6	Supervisory District 4 (UHLER).	
7		
8	PUBLIC COMMENTS	
9		
10	Sandy Harris, Granite Bay:	
11	I haven't had a chance to read this EIR. I glanced at it	P-1
12	because my community has been hit with three huge EIR since	
13	the holidays -- over the holidays. But when this first	
14	came up, we submitted -- the Granite Bay Community	
15	Association, submitted the first comments and this has more	P-2
16	to do with zoning because there's a big loophole in the	
17	zoning code for Placer County, and I hope that that's being	
18	addressed when their updating the zoning code because by	
19	rezoning this to what they've asked for, they can put --	P-3
20	this allowed use in that zone, and there are three --	
21	actually there would have been three lots there, and now	
22	we're going to have 160 residents there. And if this were	
23	in Roseville, they consider this a senior apartment type	
24	thing, that's why they haven't asked to have it brought	
25	into the City of Roseville and it's on our little island	


## RE: PLACER RETIREMENT RESIDENCE DRAFT EIR

1     there. And I hope that the planning staff and the county  
2     will look at that loophole.

3     I did notice in the EIR they have listed eight of these  
4     facilities. In Granite Bay we have a population of 29,000  
5     and our build out is for about 23-, and we have eight of  
6     these already. So we're really overloaded with this type  
7     facility and it is overloading our district in our  
8     responses. And that's my comment for now because I really  
9     haven't had a chance to go over all these.

P-3  
cont'd

RE: PLACER RETIREMENT RESIDENCE DRAFT EIR

1	REPORTER'S CERTIFICATE
2	
3	
4	I, LaCreisha Vaughn, CSR No. 13945, a Certified Shorthand
5	Reporter in and for the State of California, do hereby
6	certify:
7	That prior to being examined, the witness named in the
8	foregoing deposition solemnly stated that the testimony
9	given in this deposition would be the truth, the whole
10	truth, and nothing but the truth;
11	That said deposition was taken before me at the time and
12	place set forth and was taken down by me in shorthand and
13	thereafter reduced to computerized transcription under my
14	direction and supervision, and I hereby certify the
15	foregoing deposition is a full, true, and correct
16	transcript of my shorthand notes so taken;
17	I further certify that I am neither counsel for, nor
18	related to, any party to said action, nor in any way
19	interested in the outcome thereof.
20	
21	Dated this 28th day of February, 2019,
22	At Auburn, California.
23	
24	 LaCreisha Vaughn, CSR No. 13945
25	

Golden State Reporting & Video Services (866) 324-4727

Page: 4



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**Response to Letter P – EIR Public Comment Hearing**

- P-1 Comment noted. This comment is informational in nature and is not in conflict with the content of the EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.
- P-2 Chapter 6 of the EIR contains an alternatives analysis of Alternative 2: Development Under Existing Zoning. Under this alternative, the project would consist of the development of 3 single-family lots which would be a smaller project than the proposed project. However, this project would not meet any of the objectives of the proposed project.
- P-3 Comment noted. This comment is informational in nature and is not in conflict with the content of the EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise any environmental issues. No changes were made to the EIR as a result of this comment.

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## 3.0 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, the public, and/or consultants.

The changes represent minor clarifications/amplifications of the analysis contained in the Draft EIR and do not constitute significant new information or change any of the conclusions in the Draft EIR that, in accordance with the State 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.

#### Chapter 2: Executive Summary

For clarification purposes, *Table S-1: Project Impacts and Mitigation Measures* in Chapter 2, Summary, of the Draft EIR is hereby revised to reflect revisions made to mitigation measures as part of this Final EIR in the relevant chapters, as presented throughout this chapter. Table S-1 with revisions shown for which mitigation has been revised or added is presented at the end of this chapter. The revisions to the Executive Summary table are for clarification purposes only and do not change the conclusions of the Draft EIR.

#### Chapter 4.2: Air Quality

##### *Page 4.2-29 is revised as follows:*

According to the PCAPCD, CO concentrations should be analyzed at intersections in the project vicinity if when a project's CO emissions from vehicle operations from vehicle operation are more than 550 pounds per day and either the level of service (LOS) would be degraded from acceptable (i.e., A, B, C, or D) to unacceptable (i.e., E or F), ~~and if a~~ or the project would result in the addition of traffic that would substantially worsen (delay of 10 seconds or more) already unacceptable intersections.

*This change was made based on comment B-1.*

***Page 4.2-32 is revised as follows:***

According to the PCAPCD, in the case that operational emissions attributable to the project are below the cumulative threshold of significance of 55 pounds per day of ROG, ~~or 55 pounds per day NO<sub>x</sub>, or 82 pounds per day for PM<sub>10</sub>, and~~ the project's contribution to impacts would be considered less than cumulatively considerable. The PCAPCD does not recommend cumulative thresholds of significance for ~~PM<sub>10</sub> or~~ CO emissions. In addition, PCAPCD does not recommend cumulative thresholds of significance for construction emissions.

*This change was made based on comment B-2.*

### **Chapter 4.3: Biological Resources**

***Page 4.3-60 is revised as follows:***

**BIO-1a: Preconstruction Survey – Sanford's Arrowhead.** Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:

A focused plant survey according to USFWS, CDFW, and CNPS protocols shall be performed by a qualified biologist to the satisfaction of the Placer County Planning Services Division. The plant survey shall occur during the blooming period for Sanford's arrowhead (May through November). If Sanford's Arrowhead is not found, no further action is needed. However, if grading does not begin within three years after the survey is complete, a second survey must be completed prior to grading.

If Sanford's arrowhead or any special-status plant species is found, avoidance zone(s) shall be established around the plant(s) to demarcate the areas not to be disturbed. The USFWS, CDFW, and the Placer County Planning Services Division shall be notified immediately, and specific avoidance zones shall be determined by a qualified biologist in consultation with CDFW and USFWS.

If Sanford's arrowhead or any other special status plant species is found and avoidance is not possible, a plan to incorporate additional measures such as seed collection and/or translocation shall be developed and implemented to the satisfaction of CDFW or USFWS personnel prior to additional work within the established avoidance zone.

*This change was made based on Comment A-4.*

***Page 4.3-61 is revised as follows:***

**BIO-1c: Preconstruction Surveys – Nesting Birds.** Prior to initiation of ground-disturbing activities, ~~the approval of improvement plans~~ the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:

A pre-construction clearance survey for nesting birds shall be conducted by a qualified biologist to the satisfaction of the Placer County Planning Services Division. The survey shall be conducted in all suitable habitats on the project site within 14 days (30 days for raptor nesting) of the commencement of construction. If construction is scheduled to begin during the nesting season, the bird survey shall be conducted between February 1<sup>st</sup> and August 31<sup>st</sup> and will extend 300 feet beyond the proposed project boundary. The monitoring biologist shall use binoculars to visually determine whether bird nests occur within the 300-foot survey area if access is denied on adjacent properties.

- If construction is scheduled to begin outside the nesting season, a pre-construction nesting bird survey is not required.
- If active nests are found, a no-disturbance buffer around the nest shall be established by a qualified biologist in coordination with CDFW. Identified nests shall be surveyed during the first 24 hours prior to any construction-related activities to establish a behavioral baseline and the nests shall continue to be monitored to detect any behavioral changes. If behavioral changes are observed, work that is causing the behavioral change shall halt until coordination with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree. Once the young are independent of the nest, no further measures are necessary.
- All vertical pipes and fencing poles should be capped to prevent bird death and injury and no pesticides or rodenticides shall be used on the project site.

***Page 4.3-68 is revised as follows:***

**Mitigation Measure BIO-3: Tree Protection.** Prior to initiation of ground-disturbing activities, ~~the approval of improvement plans~~, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:

The following protection measures shall be shown on the improvement plans and implemented to protect retained trees on-site:

1. A Tree Protection Zone (TPZ) shall be established around any tree or group of trees to be retained. The TPZ shall be defined as 1.5 times the radius of the dripline or 5 feet from

the edge of any grading, whichever is greater, unless otherwise adjusted on a case-by-case basis after consultation with a certified arborist.

2. All TPZs shall be marked with post and wire or equivalent fencing, which shall remain in place for the duration of construction activities in the area. "Keep out" signs shall be posted on TPZ fencing facing out in all directions.
3. Construction-related activities, including grading, trenching, construction, demolition, or other work shall be prohibited within the TPZ. No heavy equipment or machinery shall be operated within the TPZ. No construction materials, equipment, machinery, or other supplies shall be stored within a TPZ. No wires or signs shall be attached to any tree. In the event that the contractor identifies a need to conduct activities within a TPZ, such activities must be approved and monitored by a certified arborist.
4. Selected trees shall be pruned, as necessary, to provide clearance during construction and/or to remove any defective limbs or other parts that may pose a failure risk. All pruning shall be completed by a certified arborist or tree worker and shall adhere to the Tree Pruning Guidelines of the International Society of Arboriculture.
5. Each week during construction, a certified arborist shall monitor the health and condition of the protected trees and, if necessary, recommend additional mitigations and appropriate actions. This shall include the monitoring of trees adjacent to project facilities in order to determine if construction activities (including the removal of nearby trees) would affect protected trees in the future.
6. Provide supplemental irrigation and other care, such as mulch and fertilizer.

***Page 4.3-73 is revised as follows:***

The project has been designed so that the building footprint and associated grading would avoid the riparian and perennial creek habitat. One exception is the proposed pedestrian and bike pathway which includes one crossing of the Linda Creek Treelake Tributary. This crossing, which would span the creek channel, would impact approximately 0.03-acre of riparian habitat during the construction of the multi-purpose pathway crossing. Potential impacts on riparian habitat are considered significant and mitigation is required. With the implementation of Mitigation Measures BIO-4 through BIO-7, potential impacts are considered **less than significant**.

***Page 4.73 is revised as follows:***

**Mitigation Measure BIO-4: Wetland Permits.** Prior to the approval of improvement plans, the applicant shall provide, to the satisfaction of the Development Review Committee (DRC),

evidence that the U. S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the Central Valley Regional Water Quality Control Board (RWQCB) have been notified by certified letter regarding the existence of wetlands on the property. Any permits required shall be obtained and copies submitted to DRC prior to any equipment staging, clearing, grading, or excavation work.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project. Regardless of PCCP enrollment, the applicant must notify the regulatory agencies listed above and obtain the applicable wetland permits.

*This comment was made based on comment A-9.*

**Page 4.74 is revised as follows:**

**Mitigation Measure BIO-6: Construction Fencing.** Prior to approval of Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee evidence that the following measures have been completed:

~~The grading or improvement plans shall identify the location of protective construction fencing.~~  
The Improvement Plans shall include a note stating: High visibility and silt fencing shall be erected at the edge of the construction/maintenance footprint if work is anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance. A biological monitor shall be present during the fence installation and during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance.

In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.

## Chapter 4.4: Geology and Soils

### ***Page 4.4-15 – 4.4-16 is revised as follows:***

**GEO-1a: Engineering Improvement Plans.** The applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees with the 1<sup>st</sup> Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction cost shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD prior to acceptance by the County of site improvements.

Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.

~~The applicant shall provide five (5) copies of the approved Tentative Subdivision Map(s) and two copies of the approved conditions with the plan check application. The Final Subdivision Map(s) shall not be submitted to the Engineering and Surveying Division (ESD) until the Improvement Plans are submitted for the second review. Final technical review of the Final Subdivision Map(s) shall not conclude until after the Improvement Plans are approved by the ESD. Any Building Permits associated with this project shall not be issued until, at a minimum, the Improvement Plans are approved by the Engineering and Surveying Division.~~

Prior to the County's final acceptance of the project's improvements, submit to the Engineering and Surveying Division two copies of the Record Drawings in digital format (on compact disc or other acceptable media) in accordance with the latest version of the Placer County Digital Plan and Map Standards along with two blackline hardcopies (black print on bond paper) and two PDF copies. The



digital format is to allow integration with Placer County's Geographic Information System (GIS). The final approved blackline hardcopy Record Drawings would be the official document of record.

## Chapter 4.5: Greenhouse Gas Emissions

### ***Page 4.5-24 is revised as follows:***

The project's long-term operational emissions are summarized in *Table 4.5-5: Operational Greenhouse Gas Emissions*. As shown, operation of the proposed project would generate approximately ~~730~~ 846 MTCO<sub>2</sub>e per year. Therefore, emissions would not exceed the PCAPCD De Minimis Level and no further analysis is required.

*This change was made based on comment B-3.*

## Chapter 4.6: Hydrology and Water Quality

### ***Page 4.6-20, Table 4.6-1, the analysis column for Policy 4.E.11 is revised as follows:***

The project is consistent with this policy. The proposed drainage system that includes bioretention basins, landscape swales, LID features and BMPs would ~~reduce~~ result in increases of peak discharges of approximately 14.5 percent for a 10-year storm and 14.6 percent for a 100-year storm from the site. The Placer County Flood Control and Water Conservation District Update to the Dry Creek Watershed Flood Control Plan dated November 2011 suggests that detention is not required within the Dry Creek watershed unless increases in stormwater peak flows negatively impact downstream facilities. The increase in peak discharges generated from the project drain directly into the Linda Creek Treelake Tributary located onsite. The timing of the peak discharges generated from the smaller onsite watersheds are anticipated to occur earlier compared to the peak discharges for the larger Linda Creek Treelake Tributary watershed. Therefore, the peak discharges for the Linda Creek Treelake Tributary are not expected to realize increases that would negatively impact downstream facilities.

*This change was made based on comment C-1.*

### ***Page 4.6-20, Table 4.6-1, the analysis column for Policy 4.E.12 is revised as follows:***

The project is consistent with this policy. The proposed drainage system that includes bioretention basins, landscape swales, LID features and BMPs would ~~reduce~~ result in increases of peak discharges of approximately 14.5 percent for a 10-year storm and 14.6 percent for a 100-year storm from the site. The Placer County Flood Control and Water Conservation District Update to the Dry Creek Watershed Flood Control Plan dated November 2011 suggests that detention is not required within the Dry Creek watershed unless increases in stormwater peak flows negatively impact downstream facilities. The increase in peak discharges generated from the project drain directly into the Linda Creek Treelake Tributary located onsite. The timing of the peak discharges generated from the smaller onsite watersheds are anticipated to occur

earlier compared to the peak discharges for the larger Linda Creek Treelake Tributary watershed. Therefore, the peak discharges for the Linda Creek Treelake Tributary are not expected to realize increases that would negatively impact downstream facilities.

*This change was made based on comment C-1.*

**Page 4.6-39 is revised as follows:**

As shown in Table 4.6-3: *Pre-Development Peak Flow Summary*, the project site has total 10-year and 100-year peak flows of ~~17.5~~ 15.9 cubic feet per second (cfs), and ~~35.4~~ 31.5 cfs, respectively.

*This change was made based on comment C-2.*

**Page 4.6-39 is revised as follows:**

As shown in Table 4.6-3: *Pre-Development Peak Flow Summary*, the project site has total 10-year and 100-year peak flows of ~~17.5~~ 15.9 cubic feet per second (cfs), and ~~35.4~~ 31.5 cfs, respectively.

*This change was made based on comment C-2.*

**Pages 4.6-40 and 41 are revised as follows:**

As shown in Table 4.6-4, *Post Development Peak Flow Summary*, the five watersheds would result in 10-year peak flow of ~~18.23~~ 18.25 cfs, and 100-year peak flow of 36.1 cfs, or an increase of approximately ~~16.3~~ 14.5% and 14.6%, respectively.

**Table 4.6-4: Post-Development Peak Flow Summary**

Storm Event	Watershed 1	Watershed 2	Watershed 3	Watershed 4	Watershed 5	Total	% Increase
10-year	2.9 cfs	6.1 cfs	3.2 cfs	4.9 cfs	1.1 cfs	18.25 cfs	<del>16.3</del> <u>14.5</u>
100-year	5.7 cfs	12.1 cfs	6.3 cfs	9.8 cfs	2.2 cfs	36.1 cfs	14.6

cfs = cubic feet per second

Source: Kimley-Horn, 2018

## Chapter 4.10: Transportation and Traffic

**Page 4.10-29 is revised as follows:**

**Significance Criteria 4.10-2:** Would the project result in exceeding, either individually or cumulatively, a level of service standard established by the County General Plan and/or

### **Community Plan for roads affected by project traffic? (Less Than Significant Impact With Mitigation Incorporated)**

As discussed under Significance Criteria 4.10-1 above and in the cumulative analysis below, the addition of the proposed project traffic would not result in any intersections or roadway segments dropping below an acceptable level of service ~~either directly; however, the cumulative analysis for the project as analyzed in the Traffic Impact Analysis assumed that the improvements set forth for the Granite Bay area in the Countywide Capital Improvement Program and South Placer Regional Transportation Authority fee programs were constructed in the cumulative scenario. As such, the project-specific traffic analysis assumes for the cumulative scenario that the project is required to pay the traffic impact fees in those fee programs to pay the project's fair share of the improvements to be financed by those fee programs as mitigation for the project's contribution to cumulative traffic impacts. With implementation of Mitigation Measure TRA-1, cumulative impacts would be less than cumulatively considerable and therefore less than significant as identified in the Traffic Impact Analysis prepared for the project. does not result in roadways or intersections exceeding the LOS standard established by the Granite Bay Community Plan.~~

#### **Mitigation Measure**

~~As a standard condition of approval, the project applicant would be required to pay traffic impact fees that are in effect for the Granite Bay area pursuant to:~~

**TRA-1: Traffic Impact Fees.** Prior to the issuance of any Building Permits this project shall be subject to the payment of traffic impact fees that are in effect in this area (Granite Bay), pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required:

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

The current total combined estimated fee is \$75,373.90. ~~\$7,426 per dwelling unit equivalent (DUE).~~ The fees were calculated using the information supplied. If the use or the square footage changes, then the fees will change. The fees to be paid shall be based on the fee program in effect at the time of payment. ~~that the application is deemed complete.~~

*This change was made based on staff's determination that the fee, which is already identified on page 4.10-29 of the DEIR and will be imposed as a condition of approval is also a mitigation measure to address the above cumulative impacts. The County has determined that such assumption should have been stated in the form of a mitigation measure for the project, and not just as a condition of approval, to pay those traffic impact fees. The fees collected under the fee*

*program are used to construct improvements that are identified to improve service levels. Pursuant to CEQA Guidelines section 15088.5(a), this revision does not trigger recirculation of the DEIR because it is not significant new information and the applicant has agreed to adoption of the fee payment as a mitigation measure.*

## **Chapter 6.0: Alternatives**

***Page 6-3 is revised as follows:***

***Air Quality.*** The EIR determined that implementation of the proposed project would result in less than significant impacts in regard to air quality. Construction activities associated with the proposed project would generate reactive organic gases (ROG) emissions at a level that would not exceed the Placer County Air Pollution Control District (PCAPCD) significance threshold of ~~55~~ **82** pounds per day. Therefore, no mitigation is required and potential impacts are considered less than significant. ~~the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to a less than significant level.~~

*This change was made based on comment B-4.*

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>Chapter 4.1 – AESTHETICS</b>			
<b>Significance Criteria 4.1-1:</b> Implementation of the proposed project would not potentially degrade the existing visual character or quality of the site and its surroundings.	Less Than Significant Impact  <b>Option 1: Full Frontage Improvements:</b> Significant Impact  <b>Option 2: Modified Frontage Improvements (the Proposed Project):</b> Less Than Significant Impact	<b>No mitigation measures are required.</b>  No mitigation measures were identified for the Option 1: Full Frontage Improvements option that would reduce significant visual impacts (both direct and cumulative) to less than significant.	Less Than Significant Impact  <b>Option 1: Full Frontage Improvements:</b> Significant and unavoidable.  <b>Option 2: Modified Frontage Improvements:</b> Less Than Significant Impact
<b>Significance Criteria 4.1-2:</b> Implementation of the proposed project would not create a new source of substantial light or glare, which could adversely affect day or nighttime views in the area.	Potentially Significant Impact	<b>VIS-1: Outdoor Lighting.</b> Prior to the approval of final Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, a lighting plan (separate or as part of the Improvement Plans) that demonstrates that all outdoor lighting installed as part of the proposed project is limited to the minimum amount needed for public safety, is high efficiency, and is shielded and directed downward to limit upward and sideways spillover and protect the night sky, which also would minimize light effects on the adjacent neighboring properties. All exterior lighting shall be mounted within applicable height limitations and would not exceed maximum allowable lumens. All light standards would be finished in a color that would blend into the landscape and prevent glare (i.e., black, bronze, or dark bronze). The Improvement Plans shall show the location of all outdoor lighting in compliance with this mitigation measure.	Less Than Significant Impact

**Table S-1: Project Impacts and Proposed Mitigation Measures**

<b>Impact</b>	<b>Level of Significance Before Mitigation</b>	<b>Mitigation Measures</b>	<b>Level of Significance After Mitigation</b>
<b>Significance Criteria 4.1-3:</b> Implementation of the proposed project could contribute to a cumulative impact related to the creation of a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.	Less Than Significant	No mitigation measures are required.	Less Than Significant
<b>Chapter 4.2 - AIR QUALITY</b>			
<b>Significance Criteria 4.2-1:</b> Implementation of the proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	Less Than Significant Impact	<b>No mitigation measures are required.</b>	Less Than Significant Impact
<b>Significance Criteria 4.2-2:</b> Implementation of the proposed project could violate an air quality standard or contribute substantially to an existing or projected air quality violation.	Potentially Significant Impact	<b>AQ-1: Prohibition of Wood-Burning Fireplaces.</b> The installation of wood-burning fireplaces shall be prohibited within the development. This prohibition shall be noted on the deed for future property owners to obey. Natural gas fireplaces are acceptable.	Less Than Significant Impact
<b>Significance Criteria 4.2-3:</b> Project implementation would not expose sensitive receptors to substantial pollutant concentrations.	Less Than Significant Impact	<b>No mitigation measures are required.</b>	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>Significance Criteria 4.2-4:</b> Project implementation would not expose sensitive receptors to substantial toxic air contaminant concentrations during project operations.	Less Than Significant Impact	<b>No mitigation measures are required.</b>	Less Than Significant Impact
<b>Significance Criteria 4.2-5:</b> Implementation of the proposed project would not result in construction-related and operational criteria pollutant emissions that could conflict with or obstruct implementation of the applicable Air Quality Plan.	Less Than Significant Impact	<b>No mitigation measures are required.</b>	Less Than Significant Impact
<b>Significance Criteria 4.2-6:</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	Less Than Significant Impact	<b>No mitigation measures are required.</b>	Less Than Significant Impact
<b>Chapter 4.3 - Biological Resources</b>			
<b>Significance Criteria 4.3-1:</b> The proposed project could have a substantial effect, either directly	Potentially Significant Impact	<b>BIO-1a: Preconstruction Survey – Sanford’s Arrowhead.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
or through habitat modification, including riparian habitat, on any natural community, or species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Oceanic and Atmospheric Administration Fisheries.		<p>Development Review Committee, evidence that the following measures have been completed:</p> <p>A focused plant survey according to USFWS, CDFW, and CNPS protocols shall be performed by a qualified biologist to the satisfaction of the Placer County Planning Services Division. The plant survey shall occur during the blooming period for Sanford's arrowhead (May through November). If Sanford's Arrowhead is not found, no further action is needed. However, if grading does not begin within three years after the survey is complete, a second survey must be completed prior to grading.</p> <p>If Sanford's arrowhead <u>or any special status species</u> is found, avoidance zone(s) shall be established around the plant(s) to demarcate the areas not to be disturbed. The USFWS, CDFW, and Placer County Planning Services Division shall be notified immediately, and specific avoidance zones shall be determined by a qualified biologist in consultation with USFWS and CDFW.</p> <p>If Sanford's arrowhead or any other special status plant species is found and avoidance is not possible, a plan to incorporate additional measures such as seed collection and/or translocation shall be developed and implemented to the satisfaction of CDFW or USFWS personnel prior to additional work within the established avoidance zone.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is</p>	



Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p> <p><b>BIO-1b: Preconstruction Survey –Western Pond Turtle.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>Within 48 hours of the start of any ground disturbing activities, a pre-construction survey for western pond turtle or their nests shall be conducted by a qualified biologist and to the satisfaction of the Placer County Planning Services Division. If western pond turtle is not found, no further action is needed.</p> <p>If western pond turtles are found within an area that is proposed to be disturbed, a qualified biologist, in coordination with CDFW, shall relocate the western pond turtle to a suitable location away from the proposed construction area.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p><b>BIO-1c: Preconstruction Surveys – Nesting Birds.</b> Prior to <u>initiation of ground-disturbing activities</u>, <del>the approval of Improvement Plans</del>, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>A pre-construction clearance survey for nesting birds shall be conducted by a qualified biologist to the satisfaction of the Placer County Planning Services Division. The survey shall be conducted in all suitable habitats on the project site within 14 days (30 days for raptor nesting) of the commencement of construction. If construction is scheduled to begin during the nesting season, the bird survey shall be conducted between February 1st and August 31st and will extend 300 feet beyond the proposed project boundary. The monitoring biologist shall use binoculars to visually determine whether bird nests occur within the 300-foot survey area if access is denied on adjacent properties.</p> <ul style="list-style-type: none"> <li>• If construction is scheduled to begin outside the nesting season, a pre-construction nesting bird survey is not required.</li> <li>• If active nests are found, a no-disturbance buffer around the nest shall be established by a qualified biologist in coordination with CDFW. Identified nests shall be surveyed during the first 24 hours prior to any construction-related activities to establish a behavioral baseline and the nests shall continue to be monitored to detect any behavioral changes. If behavioral changes are observed, work that is causing the behavioral change shall</li> </ul>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>halt until coordination with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree. Once the young are independent of the nest, no further measures are necessary.</p> <ul style="list-style-type: none"> <li>• All vertical pipes and fencing poles should be capped to prevent bird death and injury and no pesticides or rodenticides shall be used on the project site.</li> </ul> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p> <p><b>BIO-1d: Preconstruction Survey – Swainson’s Hawk.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>All tree removal activities shall occur outside of the nesting season (September 16 through February 28). Alternatively, prior to the commencement of ground-disturbing activities during the nesting season for Swainson’s hawk (between March 1 and September 15), a qualified biologist shall conduct a minimum of one protocol-level pre-construction survey during the recommended survey periods for the nesting season that coincides with the commencement of</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>construction activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. The biologist shall conduct surveys for nesting Swainson's hawk within 0.25-mile of the project site where legally permitted. The biologist shall use binoculars to visually determine whether Swainson's hawk nests occur within the 0.25-mile survey area if access is denied on adjacent properties. If active Swainson's hawk nests are not identified on or within 0.25-mile of the project site within the recommended survey periods, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency within 30 days following the final survey, and further avoidance and minimization measures for nesting habitat are not required.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p> <p><b>BIO-1e: Active Swainson's Hawk Nests.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed if active Swainson's Hawk nests are found within 0.25-mile of the project site:</p>	

**Table S-1: Project Impacts and Proposed Mitigation Measures**

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>If active Swainson's hawk nests are found within 0.25-mile of ground disturbing activities, the biologist shall contact the Placer County Community Development Resource Agency and CDFW within one day following the preconstruction survey to report the findings. For the purposes of this avoidance and minimization requirement, construction activities are defined to include heavy equipment operation associated with construction (use of cranes or draglines, new rock crushing activities) or other project-related activities that could cause nest abandonment or forced fledging within 0.25-mile of a nest site between March 1 and September 15. If an active nest is present within 0.25-mile of construction areas, CDFW shall be consulted to establish an appropriate noise buffer, develop take avoidance measures, determine whether high visibility construction fencing should be erected around the buffer zone, and implement a monitoring and reporting program prior to any construction activities occurring within 0.25-mile of the nest. If the biologist determines that the construction activities are disturbing the nest, the biologist shall halt construction activities until CDFW is consulted. The construction activities shall not commence until CDFW determines that construction activities would not result in abandonment of the nest site. If the biologist determines that the nest has not been disturbed during construction activities within the buffer zone, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency and CDFW within 30 days following the final monitoring event, and further avoidance and minimization measures for nesting habitat are not required.</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p> <p><b>BIO-1f: Preconstruction Survey – Pallid Bat.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <ol style="list-style-type: none"> <li><b>Prior to</b> the removal or significant pruning of trees and the demolition of buildings, a qualified bat biologist shall assess them for the potential to support roosting bats. Suitable bat roosting sites include trees with snags, rotten stumps, and decadent trees with broken limbs, exfoliating bark, cavities, and structures with cracks, joint seams and other openings to interior spaces. If there is no evidence of occupation by bats, work may proceed without further action.</li> <li>If suitable roosting habitat is present, the bat biologist shall recommend appropriate measures to prevent take of bats. Such measures may include exclusion and humane eviction (see “c” below) of bats roosting within structures during seasonal periods of peak activity (e.g., February 15 - April 15, and August 15 - October 30),</li> </ol>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>partial dismantling of structures to induce abandonment, or other appropriate measures.</p> <p>c. If bat roosts are identified on the site, the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>• If non-breeding/migratory bats are identified on the site within a tree or building that is proposed for removal, then bats shall be passively excluded from the tree or building in coordination with California Department of Fish and Wildlife. This is generally accomplished by opening up the roost area to allow airflow through the cavity/crevice, or installing one-way doors. The bat biologist shall confirm that the bats have been excluded from the tree or building before it can be removed.</li> <li>• If a maternity roost of a special-status bat species is detected, an appropriate non-disturbance buffer zone shall be established around the roost tree or building site, in consultation with the CDFW. Maternity roost sites may be demolished only when it has been determined by a qualified bat biologist that the nursery site is not occupied. Demolition of maternity roost sites may only be performed during seasonal periods of peak activity (e.g., February 15 - April 15, and August 15 - October 30).</li> </ul> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.	
<b>Significance Criteria 4.3-2:</b> The proposed project could substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number of restrict the range of an endangered, rare, or threatened species?	Potentially Significant Impact	Implement Mitigation Measures BIO-1a through BIO-1f, BIO-6 and BIO-7.	Less Than Significant Impact
<b>Significance Criteria 4.3-3:</b> The proposed project could have a substantial adverse effect on the environment by converting oak woodlands.	Potentially Significant Impact	<p><b>BIO-2: Tree Replacement.</b> Prior to the approval of Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been implemented:</p> <p>The applicant shall obtain a Tree Permit and shall provide mitigation for the loss of the on-site, native oak trees protected under the Placer County Tree Ordinance which are five inches or greater diameter at breast height as single stemmed trees, or 10 inches DBH or larger in aggregate for multiple stemmed trees. The project applicant shall compensate for the loss of such trees either through implementation of a revegetation plan or payment of fees, as determined by the Placer County Tree Preservation Ordinance.</p>	Less Than Significant Impact



**Table S-1: Project Impacts and Proposed Mitigation Measures**

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>If the applicant chooses to implement a revegetation plan, the plan shall identify the seed or seedling source of the trees to be propagated, the location of the plots, the methods to be used to ensure success of the revegetation program (e.g., irrigation), an annual reporting requirement, and the criteria to be used to measure the success of the plan. Mitigation shall include planting of replacement native trees of the same species as were removed at a 1:1 ratio for the total inches (DBH) of native trees removed (i.e., the total DBH of replacement trees will be equal to the total DBH of removed trees at an “inch-for-an-inch” replacement). Successful replacement includes:</p> <ul style="list-style-type: none"> <li>• Trees shall be specimens in at least 1-gallon sized pots and planted in accordance to industry standards.</li> <li>• A 3-year maintenance schedule shall be implemented to ensure planted saplings are established.</li> <li>• If any five-gallon size tree or greater that was replanted or relocated that is dead after three years, the tree must be replaced in kind with equal sized healthy replacements.</li> <li>• Revegetated areas or areas where trees smaller than five-gallon size were replanted must have at least seventy-five (75) percent of the trees still alive after three years.</li> </ul> <p>Alternatively, the applicant may choose to mitigate for removal of native trees by paying into the Placer County Tree Preservation Fund prior to approval of the Improvement Plans. The amount shall equal 100 dollars for each inch of protected trees removed, or the current market value as established by a qualified arborist.</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p> <p><b>BIO-3: Tree Protection.</b> Prior to <u>initiation of ground-disturbing activities</u> <del>the approval of Improvement Plans</del>, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>The following protection measures shall be shown on the Improvement Plans and implemented to protect retained trees on-site:</p> <ol style="list-style-type: none"> <li>1. A Tree Protection Zone (TPZ) shall be established around any tree or group of trees to be retained. The TPZ shall be defined as 1.5 times the radius of the dripline or 5 feet from the edge of any grading, whichever is greater, unless otherwise adjusted on a case-by-case basis after consultation with a certified arborist.</li> <li>2. All TPZs shall be marked with post and wire or equivalent fencing, which shall remain in place for the duration of construction activities in the area. "Keep out" signs shall be posted on TPZ fencing facing out in all directions.</li> <li>3. Construction-related activities, including grading, trenching, construction, demolition, or other work shall be</li> </ol>	

**Table S-1: Project Impacts and Proposed Mitigation Measures**

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>prohibited within the TPZ. No heavy equipment or machinery shall be operated within the TPZ. No construction materials, equipment, machinery, or other supplies shall be stored within a TPZ. No wires or signs shall be attached to any tree. In the event that the contractor identifies a need to conduct activities within a TPZ, such activities must be approved and monitored by a certified arborist.</p> <p>4. Selected trees shall be pruned, as necessary, to provide clearance during construction and/or to remove any defective limbs or other parts that may pose a failure risk. All pruning shall be completed by a certified arborist or tree worker and shall adhere to the Tree Pruning Guidelines of the International Society of Arboriculture.</p> <p>5. Each week during construction, a certified arborist shall monitor the health and condition of the protected trees and, if necessary, recommend additional mitigations and appropriate actions. This shall include the monitoring of trees adjacent to project facilities in order to determine if construction activities (including the removal of nearby trees) would affect protected trees in the future.</p> <p>6. Provide supplemental irrigation and other care, such as mulch and fertilizer.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		area impacts, then the Program must apply to all biological resource mitigation for the project.	
<b>Significance Criteria 4.3-4:</b> The proposed project could have a substantial adverse effect on any riparian habitat or other sensitive natural community, including oak woodlands, identified in local or regional plans, policies or regulations, or by the California Department of Fish & Game, U.S. Fish & Wildlife Service, U.S. Army Corps of Engineers or National Oceanic and Atmospheric Administration Fisheries?	Potentially Significant Impact	<p><b>BIO-4: Wetland Permits.</b> Prior to the approval of Improvement Plans, the applicant shall provide, to the satisfaction of the Development Review Committee (DRC), evidence that the U. S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the Central Valley Regional Water Quality Control Board (RWQCB) has been notified by certified letter regarding the existence of wetlands on the property. Any permits required shall be obtained and copies submitted to DRC prior to any equipment staging, clearing, grading, or excavation work.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measures (BIO-1a through 1f) may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project. <u>Regardless of PCCP enrollment, the applicant must notify the regulatory agencies listed above and obtain the applicable wetland permits.</u></p> <p><b>BIO-5: Wetland Compensation.</b> Prior to approval of Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p>	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Provide written evidence that compensatory mitigation has been established through the purchase of mitigation credits at a County-qualified wetland mitigation bank. The purchase of credits shall be equal to the amount necessary to replace wetland habitat acreage and resource values including compensation for temporal loss in accordance with approved permits. The total amount of habitat to be replaced will be determined in accordance with the total amount of impacted acreage as determined by the regulatory agencies. If written evidence is provided that regulatory permits or compensatory mitigation are not required, then this mitigation measure shall not apply.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p> <p><b>BIO-6: Construction Fencing.</b> Prior to the approval of Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>The Improvement Plans shall include a note stating: High visibility and silt fencing shall be erected at the edge of construction/maintenance footprint if work is anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas which are fence installation and during</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance. A biological monitor shall be present during the fence installation and during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p> <p><b>BIO-7: Construction Staging.</b> Prior to approval of Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>The Improvement Plans shall include a note stating that all equipment shall be stored, fueled and maintained in a vehicle staging area 300 feet or the maximum distance possible from any wetland feature and no closer than 200 feet unless a bermed (no ground disturbance) and lined refueling area is constructed and hazardous-material absorbent pads are available in the event of a spill.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.	
<b>Significance Criteria 4.3-5:</b> The proposed project could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	Potentially Significant Impact	Implement Mitigation Measures BIO-4 through BIO-7.	Less Than Significant Impact
<b>Significance Criteria 4.3-6:</b> The proposed project would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nesting or breeding sites.	Potentially Significant Impact	Implement of Mitigation Measures BIO-1a through BIO-1e.	Less Than Significant Impact
<b>Significance Criteria 4.3-7:</b> The proposed project would not conflict with any local policies or	Potentially Significant Impact	Implement Mitigation Measures BIO-1 through BIO-7.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
ordinances that protect biological resources, including oak woodland resources.			
<b>Significance Criteria 4.3-8:</b> The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	Less Than Significant Impact	<b>No mitigation measures are required.</b>	Less Than Significant Impact
<b>Chapter 4.4 – GEOLOGY AND SOILS</b>			
<b>Significance Criteria 4.4-1:</b> Implementation of the project could expose people or structures to unstable earth conditions or changes in geologic substructures.	Potentially Significant Impact	<b>GEO-1a: Engineering Improvement Plans.</b> The applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on-site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees with the 1 <sup>st</sup> Improvement	Less Than Significant Impact



Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction cost shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD prior to acceptance by the County of site improvements.</p> <p>Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.</p> <p><del>The applicant shall provide five (5) copies of the approved Tentative Subdivision Map(s) and two copies of the approved conditions with the plan check application. The Final Subdivision Map(s) shall not be submitted to the Engineering and Surveying Division (ESD) until the Improvement Plans are submitted for the second review. Final technical review of the Final Subdivision Map(s) shall not conclude until after the Improvement Plans are approved by the ESD. Any Building Permits associated with this project shall not be issued until, at a minimum, the</del></p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Improvement Plans are approved by the Engineering and Surveying Division.</p> <p>Prior to the County's final acceptance of the project's improvements, submit to the Engineering and Surveying Division two copies of the Record Drawings in digital format (on compact disc or other acceptable media) in accordance with the latest version of the Placer County Digital Plan and Map Standards along with two blackline hardcopies (black print on bond paper) and two PDF copies. The digital format is to allow integration with Placer County's Geographic Information System (GIS). The final approved blackline hardcopy Record Drawings will be the official document of record.</p> <p><b>GEO -1b Grading and Drainage Improvement Plans.</b> The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the Engineering and Surveying Division (ESD) concurs with said recommendation.</p> <p>The applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A</p>	

**Table S-1: Project Impacts and Proposed Mitigation Measures**

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Soil stockpiling or borrow areas, shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the Engineering and Surveying Division (ESD).</p> <p>The applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit shall be refunded to the project applicant or authorized agent.</p> <p>If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.</p> <p><b>GEO-1c: Geotechnical Recommendations.</b> The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Division Review and approval. The report shall address and make recommendations on the following:</p> <ul style="list-style-type: none"> <li>a. Road, pavement, and parking area design;</li> <li>b. Structural foundations, including retaining wall design (if applicable);</li> <li>c. Grading practices;</li> <li>d. Erosion/winterization;</li> <li>e. Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, etc.)</li> <li>f. Slope stability</li> </ul> <p>Once approved by the Engineering and Surveying Division (ESD), two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.</p>	
<b>Significance Criteria 4.4-2:</b> Implementation of the project could result in significant	Potentially Significant Impact	<b>Implement Mitigation Measures GEO-1a through GEO-1c, and GEO-2.</b>	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
disruptions, displacements, compaction or overcrowding of the soil		<b>GEO-2: Staging Areas.</b> The applicant shall submit Improvement Plans that identify the stockpiling and/or vehicle staging areas with locations as far as practical from existing dwellings and protected resources in the area.	
<b>Significance Criteria 4.4-3:</b> Implementation of the project would not result in substantial change in topography or ground surface relief features	Potentially Significant Impact	Less Than Significant with Implementation of Mitigation Measures GEO-1a through GEO1c.	Less Than Significant Impact
<b>Significance Criteria 4.4-4:</b> Implementation of the project could result in any significant increases in wind or water erosion of soils, either on or off-site	Potentially Significant Impact	<p>Implement Mitigation Measures HYD-1, HYD-2, and GEO-3.</p> <p><b>GEO-3: Construction BMPs.</b> The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD)).</p> <p>Storm drainage from on- and off-site impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified pollutants, as approved by the Engineering and Surveying Division (ESD). BMPs shall be designed in accordance with the West Placer Storm Water Quality Design Manual for Sizing of Permanent Post-Construction</p>	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Best Management Practices for Stormwater Quality Protection. No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.</p> <p>All permanent BMPs shall be maintained as required to ensure effectiveness. The applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of on-going maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees and certification of completed maintenance reported annually to the County DPWF Stormwater Coordinator, unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Prior to Improvement Plan approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.</p>	
<b>Significance Criteria 4.4-5:</b> Implementation of the project could result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake	Potentially Significant Impact	Implement of Mitigation Measures HYD-2 and HYD-3.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>Significance Criteria 4.4-6:</b> Implementation of the project could result in exposure of people or property to geologic and geomorphological (i.e. avalanches) hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards	Potentially Significant Impact	Implement Mitigation Measures GEO-1a, GEO-1b, and GEO-1c.	Less Than Significant Impact
<b>Significance Criteria 4.4-7:</b> Implementation of the project could Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse	Potentially Significant Impact	Implement Mitigation Measures GEO-1a, GEO-1b, and GEO-1c.	Less Than Significant Impact
<b>Significance Criteria 4.4-8:</b> Implementation of the project could be located on expansive soil, as defined in Chapter 18 of the California Building Code, creating substantial risks to life or property.	Potentially Significant Impact	Implement Mitigation Measures GEO-1a and GEO-1b, and GEO-1c	Less Than Significant Impact
<b>Chapter 4.5 – GREENHOUSE GASES</b>			
<b>Significance Criteria 4.5-1:</b> Implementation of the project would not generate greenhouse	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance.			
<b>Significance Criteria 4.5-2:</b> Implementation of the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Chapter 4.6 – HYDROLOGY AND WATER QUALITY</b>			
<b>Significance Criteria 4.6-1:</b> Implementation of the proposed project would not violate any federal, state, or county potable water quality standards.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.6-2:</b> Implementation of the proposed project would not Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a new deficit in aquifer volume or a lessening of local groundwater supplies (i.e.,	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact



Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted.			
<b>Impact 5.8-3:</b> The proposed project could degrade surface water quality or contribute runoff water which could include substantial additional sources of polluted water.	Potentially Significant Impact	<p><b>HYD-1: Water Quality BMPs.</b> Prior to approval of Improvement Plans, the project applicant shall demonstrate to the satisfaction of the Development Review Committee, that the project implements applicable permanent and operational source control measures. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans. The project is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit.</p> <p>The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification</p>	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>management as outlined in the West Placer Storm Water Quality Design Manual.</p> <p><b>HYD-2: Stormwater Quality Control Plan.</b> Prior to approval of Improvement Plans, the project applicant shall provide to the satisfaction of the Development Review Committee, a final Storm Water Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or as a separate document that identifies how this project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface (excepting projects that do not increase impervious surface area over the pre-project condition) are also required to demonstrate hydromodification management of stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2 year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions.</p> <p><b>HYD-3: Diversion Around Trash Storage Areas.</b> Prior to approval of Improvement Plans, the project applicant shall provide to the satisfaction of the Development Review Committee, Improvement Plans that show all stormwater runoff shall be diverted around trash storage areas to minimize contact with pollutants. Trash container areas shall be screened or walled to prevent off-site transport of trash by the forces of water or wind. Trash containers shall</p>	

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		not be allowed to leak and must remain covered when not in use.  <b>HYD-4: Waste Discharger Identification.</b> Prior to construction commencing, the project applicant shall provide to the satisfaction of the Development Review Committee, evidence to the Engineering and Surveying Division of a Waste Discharged Identification (WDID) number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit.	
<b>Significance Criteria 4.6-4:</b> Implementation of the proposed project would not otherwise substantially degrade ground water quality.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.6-5:</b> Implementation of the proposed project could Substantially alter the drainage pattern or the site or area or increase the rate or amount of surface runoff.	Potentially Significant Impact	<b>HYD-5: Final Drainage Study.</b> Prior to approval of Improvement Plans, the project applicant shall provide to the satisfaction of the Development Review Committee the preliminary Drainage Report provided during environmental review submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations,	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of improvement plan submittal.</p> <p><b>HYD-6: Drainage Improvement and Flood Control Fees.</b> This project is subject to the one-time payment of drainage improvement and flood control fees pursuant to the "Dry Creek Watershed Interim Drainage Improvement Ordinance" (Ref. Chapter 15, Article 15.32, Placer County Code.) have been paid. The current estimated development fee is \$1,854 per acre, payable to the Engineering and Surveying Division prior to Building Permit issuance. The fees to be paid shall be based on the fee program in effect at the time that the application is deemed complete.</p>	
<b>Significance Criteria 4.6-6:</b> Implementation of the proposed project would not impact the watershed of important surface water resources, including but not limited to Lake Tahoe, Folsom Lake, Hell Hole Reservoir, Rock Creek Reservoir, Sugar Pine Reservoir, French Meadows	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Reservoir, Combie Lake, and Rollins Lake.			
<b>Significance Criteria 4.6-7:</b> Implementation of the proposed project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or place within a 100-year flood hazard area improvements which would impede or redirect flood flows.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.6-8:</b> Implementation of the proposed project would not place people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	No Impact	No mitigation measures are required.	No Impact
<b>Chapter 4.7 – LAND USE AND PLANNING</b>			
<b>Significance Criteria 4.7-1:</b> Implementation of the proposed project would not physically divide an established community.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>Significance Criteria 4.7-2:</b> Implementation of the proposed project would not conflict with General Plan or Community Plan land use designations or zoning, or Plan policies adopted for the purpose of avoiding or mitigating an environmental effect.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.7-3:</b> Implementation of the proposed project would not conflict with any applicable habitat conservation plan or natural community conservation plan or other County policies, plans, or regulations adopted for purposes of avoiding or mitigating environmental effects.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.7-4:</b> Implementation of the proposed project would not result in the development of incompatible uses and/or the creation of land use conflicts.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.7-5:</b> Implementation of the proposed project would not affect agricultural and timber resources or operations (i.e., impacts to soils	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
or farmlands and timber harvest plans, or impacts from incompatible land uses.			
<b>Significance Criteria 4.7-6:</b> Implementation of the proposed project would not disrupt or divide the physical arrangement of an established community (including a low income or minority community).	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.7-7:</b> Implementation of the proposed project would not result in a substantial alteration of the present or planned land use of an area.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.7-8:</b> Implementation of the proposed project would not cause economic or social changes that would result in significant adverse physical changes to the environment such as urban decay or deterioration.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Chapter 4.8 – NOISE</b>			
<b>Significance Criteria 4.8-1:</b> Implementation of the proposed project would not result in a	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.			
<b>Significance Criteria 4.8-2:</b> Implementation of the proposed project would not expose persons to, or generate, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.8-3:</b> Implementation of the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.8-4:</b> The proposed project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact



Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>Significance Criteria 4.8-5:</b> The proposed project would not be located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.8-6:</b> Implementation of the proposed project would not expose people to or generate excessive groundborne vibration or groundborne noise levels.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Chapter 4.9 – PUBLIC SERVICES</b>			
<b>Significance Criteria 4.9-1:</b> The proposed project would not result in substantial adverse physical impacts associated with Fire Protection, Sheriff Protection, Schools, Maintenance of Public Facilities, or Other Governmental Services	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Chapter 4.10 – TRAFFIC AND CIRCULATION</b>			
<b>Significance Criteria 4.10-1:</b> Implementation of the project would not cause an increase in traffic which is substantial in	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections).			
<b>Significance Criteria 4.10-2:</b> Implementation of the project would not exceed, either individually or cumulatively, a level of service standard established by the County General Plan and/or Community Plan for roads affected by project traffic.	Less Than Significant Impact	<p><b><u>TRA-1: Traffic Impact Fees.</u></b> Prior to the issuance of any Building Permits this project shall be subject to the payment of traffic impact fees that are in effect in this area (Granite Bay), pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required:</p> <p>A) <u>County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code</u></p> <p>B) <u>South Placer Regional Transportation Authority (SPRTA)</u></p> <p><u>The current total combined estimated fee is \$75,373.90. The fees were calculated using the information supplied. If the use or the square footage changes, then the fees will change. The fees to be paid shall be based on the fee program in effect at the time of payment.</u></p>	Less Than Significant Impact
<b>Significance Criteria 4.10-3:</b> Implementation of the project would not increase impacts to vehicle safety due to roadway	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
design features (i.e., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).			
<b>Significance Criteria 4.10-4:</b> Implementation of the project would not result in inadequate emergency access or access to nearby uses	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.10-5:</b> Implementation of the project would not result in insufficient parking capacity on-site or off-site.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.10-6:</b> Implementation of the project would not result in hazards or barriers for pedestrians or bicyclists.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Significance Criteria 4.10-7:</b> Implementation of the project would not result in conflicts with adopted policies, plans, or programs supporting alternative transportation (i.e., bus turnouts, bicycle lanes, bicycle racks, public transit, pedestrian facilities, etc.) or otherwise decrease the	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
performance or safety of such facilities.			
<b>Significance Criteria 4.10-8:</b> Implementation of the project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>Chapter 4.11 – ENERGY CONSERVATION</b>			
<b>Significance Criteria 4.11-1:</b> Project implementation would not result in the inefficient, wasteful or unnecessary consumption of energy during project construction or operation.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant Impact
<b>SUMMARY OF MITIGATION MEASURES IDENTIFIED IN THE INITIAL STUDY</b>			
<b>II. AGRICULTURE AND FOREST RESOURCES</b>			
<b>Impact II-2:</b> Implementation of the project could conflict with General Plan or other policies regarding land use buffers for agricultural operations.	Potentially Significant Impact	<b>MM II-1:</b> The facility managers shall notify all future tenants of Placer County's Right-to-Farm Ordinance (Placer County Code Section 5.24.040) by informing them that the policies and regulations are in place to maintain, encourage, and support farm operations and that there may be agricultural activities occurring in the future in the area of the proposed project. This information shall be included in the lease or rental agreements for the development.	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>Impact II-3:</b> Implementation of the project could conflict with existing zoning for agricultural use, a Williamson Act contract or a Right-to-Farm Policy.	Potentially Significant Impact	Implementation of MM II-1.	Less Than Significant Impact
<b>V. CULTURAL RESOURCES</b>			
<b>Impact V-2:</b> Implementation of the proposed project could substantially cause adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines, Section 15064.5.	Potentially Significant Impact	<p><b>MM V.1:</b> The Improvement Plans shall include a statement that if any archaeological artifacts, exotic rock (non-native), or unusual amounts of shell or bone are uncovered during any on-site construction activities, all work shall be stopped immediately within a 100-foot radius of the find and a qualified archaeologist retained to evaluate the deposit. The Placer County Planning Services Division and Department of Museums shall also be contacted for review of the archaeological find(s).</p> <p>If the discovery consists of human remains, the Placer County Coroner and Native American Heritage Commission must also be contacted. Work in the area may only proceed after authorization is granted by the Placer County Planning Services Division. Following a review of the new find and consultation with appropriate experts, if necessary, the authority to proceed may be accompanied by the addition of development requirements that provide protection of the site and/or additional mitigation measures necessary to address the unique or sensitive nature of the site.</p> <p><b>MM V.2:</b> Prior to the start of ground disturbance, all construction personnel involved with earth-moving activities should be informed that artifacts protected by law could be discovered during excavating. The training should</p>	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		include the appearance of common artifacts and proper notification procedures should artifacts be discovered. This worker training should be prepared and presented by a qualified archaeological professional.	
<b>Impact V-4:</b> Implementation of the proposed project could restrict existing religious or sacred uses within the potential impact area.	Potentially Significant Impact	<p><b>MM V.3:</b> Prior to the start of ground disturbance, develop a standard operating procedure, points of contact, timeline and schedule for the project so all possible damages can be avoided or alternatives and cumulative impacts properly accessed.</p> <p>If potential archaeological resources cultural resources, articulated, or disarticulated human remains are discovered by Native American Representatives or Monitors from interested Native American Tribes, qualified cultural resources specialists or other project personnel during construction activities, work will cease in the immediate vicinity of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from an interested Native American Tribe is present. A qualified cultural resources specialist and Native American Representatives and Monitors from culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. These recommendations will be documented in the project record. For any recommendations made by interested Native American Tribes which are not implemented, a justification for why the recommendation was not followed will be provided in the project record.</p> <p>If adverse impacts to tribal cultural resources, unique archeology, or other cultural resources occurs, then</p>	Less Than Significant Impact

Table S-1: Project Impacts and Proposed Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		consultation with UAIC regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 should occur, in order to coordinate for compensation for the impact by replacing or providing substitute resources or environments.	
<b>XIII PALEONTOLOGICAL RESOURCES</b>			
<b>Impact XIII-1:</b> Implementation of the proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially Significant Impact	MM XIII: Prior to <u>initiation of ground-disturbing activities</u> , <del>improvement plan submittal</del> , the applicant shall provide written evidence to the Planning Services Division that a qualified paleontologist has been retained by the applicant to observe grading activities and salvage fossils as necessary. The paleontologist shall establish procedures for paleontological resource surveillance and shall establish, in cooperation with the project developer, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of fossils. If major paleontological resources are discovered, which require temporary halting or redirecting of grading, the paleontologist shall report such findings to the project developer, and to the Placer County Department of Museums and Planning Services Division.	Less Than Significant Impact
<b>XVI RECREATION</b>			
<b>Impact XVI-1:</b> Implementation of the proposed project could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical	Potentially Significant Impact	The project applicant shall provide onsite active and passive recreational land that meets the requirement set forth in the Placer County General Plan. If onsite provision of sufficient active and passive parkland cannot be provided, the project applicant shall pay in-lieu fees consistent with the Placer County Park Dedication Fee Program (PDF Program) when a building permit is applied for. This fee will	Less Than Significant Impact

**Table S-1: Project Impacts and Proposed Mitigation Measures**

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
deterioration of the facility would occur or be accelerated.		be used for the acquisition, improvement, and/or expansion of parks and recreational facilities within the community.	
<b>XVII TRIBAL CULTURAL RESOURCES</b>			
<b>Impact XVIII:</b> Implementation of the proposed project could cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code, Section 21074	Potentially Significant Impact	Implement MM v.1, MM V.2, MM V.3	Less Than Significant Impact



## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

### 4.1 INTRODUCTION

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a “mitigated negative declaration” or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the Placer Retirement Residence project. The intent of the MMRP is to ensure implementation of the mitigation measures identified within the Environmental Impact Report (EIR) for this project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the applicant.

### 4.2 COMPLIANCE CHECKLIST

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the EIR and the Initial Study prepared for the proposed project. This MMRP is intended to be used by Placer County staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the EIR and Initial Study.

The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA Guidelines, Section 15370, as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by Placer County. The table attached to this report identifies the mitigation measure, the monitoring action for the mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMRP. The County will be responsible for monitoring compliance.

### **4.3 MITIGATION MONITORING AND REPORTING PROGRAM**

The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.

## Mitigation Monitoring and Reporting Program

### Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
Section 4.1 - Aesthetics						
VIS-1: Outdoor Lighting. Prior to the approval of final Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, a lighting plan (separate or as part of the Improvement Plans) that demonstrates that all outdoor lighting installed as part of the proposed project is limited to the minimum amount needed for public safety, is high efficiency, and is shielded and directed downward to limit upward and sideways spillover and protect the night sky, which also would minimize light effects on the adjacent neighboring properties. All exterior lighting shall be mounted within applicable height limitations and would not exceed maximum allowable lumens. All light standards would be finished in a color that would blend into the landscape and prevent glare (i.e., black, bronze, or dark bronze). The Improvement Plans shall show the location of all outdoor lighting in compliance with this mitigation measure.	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			
Section 4.2 – Air Quality						
AQ-1: Prohibition of Wood-Burning Fireplaces. The installation of wood-burning fireplaces shall be prohibited within the development. This prohibition shall be noted on the deed for future property owners to obey. Natural gas fireplaces are acceptable.	Prior to issuance of a building permit	Pre-construction	County of Placer Community Development Resource Agency			
Section 4.3 – Biological Resources						
BIO-1a: Preconstruction Survey – Sanford’s Arrowhead. Prior to initiation of ground disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:	Prior to ground disturbing activities	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>A focused plant survey according to USFWS, CDFW, and CNPS protocols shall be performed by a qualified biologist to the satisfaction of the Placer County Planning Services Division. The plant survey shall occur during the blooming period for Sanford's arrowhead (May through November). If Sanford's Arrowhead is not found, no further action is needed. However, if grading does not begin within three years after the survey is complete, a second survey must be completed prior to grading.</p> <p>If Sanford's arrowhead or any special status plant species is found, avoidance zone(s) shall be established around the plant(s) to demarcate the areas not to be disturbed. The USFWS, CDFW, and the Placer County Planning Services Division shall be notified immediately, and specific avoidance zones shall be determined by a qualified biologist in consultation with CDFW and USFWS.</p> <p>If Sanford's arrowhead or any other special status plant species is found and avoidance is not possible, a plan to incorporate additional measures such as seed collection and/or translocation shall be developed and implemented to the satisfaction of CDFW or USFWS personnel prior to additional work within the established avoidance zone.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts,</p>						

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
then the Program must apply to all biological resource mitigation for the project.						
<p><b>BIO-1b: Preconstruction Survey – Preconstruction Western Pond Turtle.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>Within 48 hours of the start of any ground disturbing activities, a pre-construction survey for western pond turtle shall be conducted by a qualified biologist and to the satisfaction of the Placer County Planning Services Division. If western pond turtle is not found, not further action is needed.</p> <p>If western pond turtles are found within an area that is proposed to be disturbed, a qualified biologist, in consultation with CDFW, shall relocate the western pond turtle to a suitable location away from the proposed construction area.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>	Prior to any ground-disturbing activities	Pre-Construction	County of Placer Community Development Resource Agency			

### Mitigation Monitoring and Reporting Program Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p><b>BIO-1c: Preconstruction Surveys – Nesting Birds.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>A pre-construction clearance survey for nesting birds shall be conducted by a qualified biologist to the satisfaction of the Placer County Planning Services Division. The survey shall be conducted in all suitable habitats on the project site within 14 days (30 days for raptor nesting) of the commencement of construction. If construction is scheduled to begin during the nesting season, the bird survey shall be conducted between February 1st and August 31st and will extend 300 feet beyond the proposed project boundary. The monitoring biologist shall use binoculars to visually determine whether bird nests occur within the 300-foot survey area if access is denied on adjacent properties.</p> <ul style="list-style-type: none"> <li>• If construction is scheduled to begin outside the nesting season, a pre-construction nesting bird survey is not required.</li> <li>• If active nests are found, a no-disturbance buffer around the nest shall be established by a qualified biologist in coordination with CDFW. Identified nests shall be surveyed during the first 24 hours prior to any construction-related activities to establish a behavioral baseline and the nests shall continue to be monitored to detect any behavioral changes. If behavioral changes are observed, work that is causing the behavioral change shall halt until coordination with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree. Once the</li> </ul>	Prior to any ground disturbance activities	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>young are independent of the nest, no further measures are necessary.</p> <ul style="list-style-type: none"> <li>All vertical pipes and fencing poles should be capped to prevent bird death and injury and no pesticides or rodenticides shall be used on the project site.</li> </ul> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>						
<p><b>BIO-1d: Preconstruction Survey – Swainson’s Hawk.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>All tree removal activities shall occur outside of the nesting season (September 16 to February 28). Alternatively, prior to the commencement of ground-disturbing activities during the nesting season for Swainson’s hawk (between March 1 and September 15), a qualified biologist shall conduct a minimum of one protocol-level pre-construction survey during the recommended survey periods for the nesting season that coincides with the commencement of construction activities, in accordance with the Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in</p>	Prior to any ground disturbance activities	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>California's Central Valley. The biologist shall conduct surveys for nesting Swainson's hawk within 0.25-mile of the project site where legally permitted. The biologist shall use binoculars to visually determine whether Swainson's hawk nests occur within the 0.25-mile survey area if access is denied on adjacent properties. If active Swainson's hawk nests are not identified on or within 0.25-mile of the project site within the recommended survey periods, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency within 30 days following the final survey, and further avoidance and minimization measures for nesting habitat are not required.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>						
<p><b>BIO-1e: Active Swainson's Hawk Nests.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed if active Swainson's Hawk nests are found within 0.25-mile of the project site:</p> <p>If active Swainson's hawk nests are found within 0.25-mile of ground disturbing activities, the biologist shall contact the Placer County Community Development Resource Agency and</p>	Prior to any ground disturbance activities	Pre-construction	County of Placer Community Development Resource Agency			



**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>CDFW within one day following the preconstruction survey to report the findings. For the purposes of this avoidance and minimization requirement, construction activities are defined to include heavy equipment operation associated with construction (use of cranes or draglines, new rock crushing activities) or other project-related activities that could cause nest abandonment or forced fledging within 0.25-mile of a nest site between March 1 and September 15. If an active nest is present within 0.25-mile of construction areas, CDFW shall be consulted to establish an appropriate noise buffer, develop take avoidance measures, determine whether high visibility construction fencing should be erected around the buffer zone, and implement a monitoring and reporting program prior to any construction activities occurring within 0.25-mile of the nest. If the biologist determines that the construction activities are disturbing the nest, the biologist shall halt construction activities until CDFW is consulted. The construction activities shall not commence until CDFW determines that construction activities would not result in abandonment of the nest site. If the biologist determines that the nest has not been disturbed during construction activities within the buffer zone, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency and CDFW within 30 days following the final monitoring event, and further avoidance and minimization measures for nesting habitat are not required.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to</p>						

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.						
<p><b>BIO-1f: Preconstruction Survey – Pallid Bat.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>a. Prior to the removal or significant pruning of trees and the demolition of buildings, a qualified bat biologist shall assess them for the potential to support roosting bats. Suitable bat roosting sites include trees with snags, rotten stumps, and decadent trees with broken limbs, exfoliating bark, cavities, and structures with cracks, joint seams and other openings to interior spaces. If there is no evidence of occupation by bats, work may proceed without further action.</p> <p>b. If suitable roosting habitat is present, the bat biologist shall recommend appropriate measures to prevent take of bats. Such measures may include exclusion and humane eviction (see “c” below) of bats roosting within structures during seasonal periods of peak activity (e.g., February 15 - April 15, and August 15 - October 30), partial dismantling of structures to induce abandonment, or other appropriate measures.</p> <p>c. If bat roosts are identified on the site, the following measures shall be implemented:</p>	Prior to any ground disturbance activities	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> <li>If non-breeding/migratory bats are identified on the site within a tree or building that is proposed for removal, then bats shall be passively excluded from the tree or building in coordination with California Department of Fish and Wildlife. This is generally accomplished by opening up the roost area to allow airflow through the cavity/crevice or installing one-way doors. The bat biologist shall confirm that the bats have been excluded from the tree or building before it can be removed.</li> <li>If a maternity roost of a special-status bat species is detected, an appropriate non-disturbance buffer zone shall be established around the roost tree or building site, in consultation with the CDFW. Maternity roost sites may be demolished only when it has been determined by a qualified bat biologist that the nursery site is not occupied. Demolition of maternity roost sites may only be performed during seasonal periods of peak activity (e.g., February 15 - April 15, and August 15 - October 30).</li> </ul> <p>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>						
<b>BIO-2: Tree Replacement.</b> Prior to the approval of Improvement Plans, the applicant shall submit to the	Prior to any ground disturbance activities	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>satisfaction of the Development Review Committee, evidence that the following measures have been implemented:</p> <p>The applicant shall obtain a Tree Permit and shall provide mitigation for the loss of the on-site, native oak trees protected under the Placer County Tree Ordinance which are five inches or greater diameter at breast height as single stemmed trees, or 10 inches DBH or larger in aggregate for multiple stemmed trees. The project applicant shall compensate for the loss of such trees either through implementation of a revegetation plan or payment of fees, as determined by the Placer County Tree Preservation Ordinance.</p> <p>If the applicant chooses to implement a revegetation plan, the plan shall identify the seed or seedling source of the trees to be propagated, the location of the plots, the methods to be used to ensure success of the revegetation program (e.g., irrigation), an annual reporting requirement, and the criteria to be used to measure the success of the plan. Mitigation shall include planting of replacement native trees of the same species as were removed at a 1:1 ratio for the total inches (DBH) of native trees removed (i.e., the total DBH of replacement trees will be equal to the total DBH of removed trees at an “inch-for-an-inch” replacement). Successful replacement includes:</p> <ul style="list-style-type: none"> <li>• Trees shall be specimens in at least 1-gallon sized pots and planted in accordance to industry standards.</li> <li>• A 3-year maintenance schedule shall be implemented to ensure planted saplings are established.</li> </ul>						

### Mitigation Monitoring and Reporting Program Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> <li>• If any five-gallon size tree or greater that was replanted or relocated that is dead after three years, the tree must be replaced in kind with equal sized healthy replacements.</li> <li>• Revegetated areas or areas where trees smaller than five-gallon size were replanted must have at least seventy-five (75) percent of the trees still alive after three years.</li> </ul> <p>Alternatively, the applicant may choose to mitigate for removal of native trees by paying into the Placer County Tree Preservation Fund prior to approval of the Improvement Plans. The amount shall equal 100 dollars for each inch of protected trees removed, or the current market value as established by a qualified arborist.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>						
<p><b>BIO-3: Tree Protection.</b> Prior to initiation of ground-disturbing activities, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>The following protection measures shall be shown on the Improvement Plans and implemented to protect retained trees on-site:</p>	Prior to any ground disturbance activities	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>1. A Tree Protection Zone (TPZ) shall be established around any tree or group of trees to be retained. The TPZ shall be defined as 1.5 times the radius of the dripline or 5 feet from the edge of any grading, whichever is greater, unless otherwise adjusted on a case-by-case basis after consultation with a certified arborist.</p> <p>2. All TPZs shall be marked with post and wire or equivalent fencing, which shall remain in place for the duration of construction activities in the area. "Keep out" signs shall be posted on TPZ fencing facing out in all directions.</p> <p>3. Construction-related activities, including grading, trenching, construction, demolition, or other work shall be prohibited within the TPZ. No heavy equipment or machinery shall be operated within the TPZ. No construction materials, equipment, machinery, or other supplies shall be stored within a TPZ. No wires or signs shall be attached to any tree. In the event that the contractor identifies a need to conduct activities within a TPZ, such activities must be approved and monitored by a certified arborist.</p> <p>4. Selected trees shall be pruned, as necessary, to provide clearance during construction and/or to remove any defective limbs or other parts that may pose a failure risk. All pruning shall be completed by a certified arborist or tree worker and shall adhere to the Tree Pruning Guidelines of the International Society of Arboriculture.</p> <p>5. Each week during construction, a certified arborist shall monitor the health and condition of the protected trees and, if necessary, recommend additional mitigations and appropriate actions. This shall include the monitoring of trees adjacent to project facilities in order to determine if construction activities</p>						

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>(including the removal of nearby trees) would affect protected trees in the future.</p> <p>6. Provide supplemental irrigation and other care, such as mulch and fertilizer.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>						
<p><b>BIO-4: Wetland Permits</b> Prior to the approval of Improvement Plans, the applicant shall provide, to the satisfaction of the Development Review Committee (DRC), evidence that the U. S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the Central Valley Regional Water Quality Control Board (RWQCB) has been notified by certified letter regarding the existence of wetlands on the property. Any permits required shall be obtained and copies submitted to DRC prior to any equipment staging, clearing, grading, or excavation work.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measures (BIO-1a through 1f) may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP</p>	Prior to approval of Improvements Plans	Pre-construction	County of Placer Community Development Resource Agency; U.S. Army Corps of Engineers; Regional Water Quality Control Board; California Department of Fish and Wildlife.			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project. Regardless of PCCP enrollment, the applicant must notify the regulatory agencies listed above and obtain the applicable wetland permits.						
<p><b>BIO-5: Wetland Compensation.</b> Prior to the approval of Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>Provide written evidence that compensatory mitigation has been established through the purchase of mitigation credits at a County-qualified wetland mitigation bank. The purchase of credits shall be equal to the amount necessary to replace wetland habitat acreage and resource values including compensation for temporal loss in accordance with approved permits. The total amount of habitat to be replaced will be determined in accordance with the total amount of impacted acreage as determined by the regulatory agencies. If written evidence is provided that regulatory permits or compensatory mitigation are not required, then this mitigation measure shall not apply.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts,</p>	Prior to approval of Improvements Plans	Pre-construction	County of Placer Community Development Resource Agency			



**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
then the Program must apply to all biological resource mitigation for the project.						
<p><b>BIO-6: Construction Fencing.</b> Prior to the approval of Improvement Plans, the applicant shall submit to the satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>The Improvement Plans shall include a note stating: High visibility and silt fencing shall be erected at the edge of construction/maintenance footprint if work is anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance. A biological monitor shall be present during the fence installation and during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>	Prior to approval of Improvements Plans	Pre-construction	County of Placer Community Development Resource Agency			
<p><b>BIO-7: Construction Staging.</b> Prior to the approval of Improvement Plans, the applicant shall submit to the</p>	Prior to approval of Improvements Plans	Pre-construction	County of Placer Community			

### Mitigation Monitoring and Reporting Program Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>satisfaction of the Development Review Committee, evidence that the following measures have been completed:</p> <p>The Improvement Plans shall include a note stating that all equipment shall be stored, fueled and maintained in a vehicle staging area 300 feet or the maximum distance possible from any wetland feature and no closer than 200 feet unless a bermed (no ground disturbance) and lined refueling area is constructed and hazardous-material absorbent pads are available in the event of a spill.</p> <p>In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project, then the above mitigation measure may be replaced with standard mitigation fees and conservation protocol to address this resource impact as set forth in the PCCP implementation document. If PCCP enrollment is chosen as mitigation for one or more biological resource area impacts, then the Program must apply to all biological resource mitigation for the project.</p>			Development Resource Agency			

#### Section 4.4 – Geology and Soils

<p><b>GEO-1a: Engineering Improvement Plans.</b> The applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on-site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and</p>	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			
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**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees with the 1<sup>st</sup> Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction cost shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD prior to acceptance by the County of site improvements.</p> <p>Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.</p> <p>Prior to the County's final acceptance of the project's improvements, submit to the Engineering and Surveying Division two copies of the Record Drawings in digital format (on compact disc or other acceptable media) in accordance with the latest version of the Placer County Digital Plan and Map Standards along with two blackline hardcopies (black print on bond paper) and two PDF copies. The digital format is to allow integration with Placer County's Geographic Information System (GIS). The final approved blackline</p>						

### Mitigation Monitoring and Reporting Program Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
hardcopy Record Drawings will be the official document of record.						
<p><b>GEO-1b, Grading and Drainage Improvement Plans:</b> The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the Engineering and Surveying Division (ESD) concurs with said recommendation.</p> <p>The applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Soil stockpiling or borrow areas, shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the Engineering and Surveying Division (ESD).</p> <p>The applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved</p>	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>engineer's estimate for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit shall be refunded to the project applicant or authorized agent.</p> <p>If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.</p>						
<p><b>GEO-1c: Geotechnical Recommendations.</b> The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Division Review and approval. The report shall address and make recommendations on the following:</p> <ul style="list-style-type: none"> <li>a. Road, pavement, and parking area design;</li> <li>b. Structural foundations, including retaining wall design (if applicable);</li> <li>c. Grading practices;</li> </ul>	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>d. Erosion/winterization;</p> <p>e. Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, etc.)</p> <p>f. Slope stability</p> <p>Once approved by the Engineering and Surveying Division (ESD), two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.</p>						
<p><b>GEO-2: Staging Areas.</b> The applicant shall submit Improvement Plans that identify the stockpiling and/or vehicle staging areas with locations as far as practical from existing dwellings and protected resources in the area.</p>	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			
<p><b>GEO-3: Construction BMPs.</b> The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/ Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD)).</p> <p>Storm drainage from on- and off-site impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other</p>	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>identified pollutants, as approved by the Engineering and Surveying Division (ESD). BMPs shall be designed in accordance with the West Placer Storm Water Quality Design Manual for Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection. No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.</p> <p>All permanent BMPs shall be maintained as required to ensure effectiveness. The applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of on-going maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees and certification of completed maintenance reported annually to the County DPWF Stormwater Coordinator, unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Prior to Improvement Plan approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.</p>						
<b>Section 4.6 – Hydrology and Water Quality</b>						
<b>HYD-1: Water Quality BMPs.</b> Prior to approval of Improvement Plans, the project applicant shall demonstrate to the satisfaction of the Development Review Committee, that the	Prior to approval of Improvement Plans.	Preconstruction	County of Placer Community Development Resource Agency			

### Mitigation Monitoring and Reporting Program Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>project implements applicable permanent and operational source control measures. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans. The project is located within the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit.</p> <p>The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management as outlined in the West Placer Storm Water Quality Design Manual.</p>						
<p><b>HYD-2: Stormwater Quality Control Plan.</b> Prior to approval of Improvement Plans, the project applicant shall provide to the satisfaction of the Development Review Committee, a final Storm Water Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or as a separate document that identifies how this project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface (excepting projects that do not increase</p>	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			



**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
impervious surface area over the pre-project condition) are also required to demonstrate hydromodification management of stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2 year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions.						
<b>HYD-3: Diversion Around Trash Storage Areas.</b> Prior to approval of Improvement Plans, the project applicant shall provide to the satisfaction of the Development Review Committee, Improvement Plans that show all stormwater runoff shall be diverted around trash storage areas to minimize contact with pollutants. Trash container areas shall be screened or walled to prevent off-site transport of trash by the forces of water or wind. Trash containers shall not be allowed to leak and must remain covered when not in use.	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			
<b>HYD-4: Waste Discharger Identification.</b> Prior to construction commencing, the project applicant shall provide to the satisfaction of the Development Review Committee, evidence to the Engineering and Surveying Division of a Waste Discharged Identification (WDID) number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit.	Prior to construction	Pre-Construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
<b>HYD-5: Final Drainage Study.</b> Prior to approval of Improvement Plans, the project applicant shall provide to the satisfaction of the Development Review Committee the preliminary Drainage Report provided during environmental review submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of improvement plan submittal.	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			
<b>HYD-6: Drainage Improvement and Flood Control Fees.</b> This project is subject to the one-time payment of drainage improvement and flood control fees pursuant to the "Dry Creek Watershed Interim Drainage Improvement Ordinance" (Ref. Chapter 15, Article 15.32, Placer County Code.) have been paid. The current estimated development fee is \$1,854 per acre, payable to the Engineering and Surveying Division prior to Building Permit issuance. The fees to be paid shall be based	Prior to building permit issuance	Pre-Construction	County of Placer Community Development Resource Agency			

## Mitigation Monitoring and Reporting Program Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
on the fee program in effect at the time that the application is deemed complete.						

### Section 4.10 – Transportation and Traffic

<p><b>TRA-1: Traffic Impact Fees.</b> Prior to the issuance of any Building Permits this project shall be subject to the payment of traffic impact fees that are in effect in this area (Granite Bay), pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required:</p> <p>A) County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code</p> <p>B) South Placer Regional Transportation Authority (SPRTA)</p> <p>The current total combined estimated fee is \$75,373.90. The fees were calculated using the information supplied. If the use or the square footage changes, then the fees will change. The fees to be paid shall be based on the fee program in effect at the time of payment.</p>	Prior to building permit issuance	Pre-Construction	County of Placer Community Development Resource Agency			
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### SUMMARY OF MITIGATION MEASURES IDENTIFIED IN THE INITIAL STUDY

#### Agriculture and Forest Resources

<p><b>MM II-1:</b> The facility managers shall notify all future tenants of Placer County's Right-to-Farm Ordinance (Placer County Code Section 5.24.040) by informing them that the policies and regulations are in place to maintain, encourage, and support farm operations and that there may be agricultural activities occurring in the future in the area of the proposed project. This</p>	Prior to occupancy	Post-construction	County of Placer Community Development Resource Agency			
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## Mitigation Monitoring and Reporting Program Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
this information shall be included in the lease or rental agreements for the development.						
<b>Cultural Resources</b>						
<p><b>MM V.1:</b> The Improvement Plans shall include a statement that if any archaeological artifacts, exotic rock (non-native), or unusual amounts of shell or bone are uncovered during any on-site construction activities, all work shall be stopped immediately within a 100-foot radius of the find and a qualified archaeologist retained to evaluate the deposit. The Placer County Planning Services Division and Department of Museums shall also be contacted for review of the archaeological find(s).</p> <p>If the discovery consists of human remains, the Placer County Coroner and Native American Heritage Commission must also be contacted. Work in the area may only proceed after authorization is granted by the Placer County Planning Services Division. Following a review of the new find and consultation with appropriate experts, if necessary, the authority to proceed may be accompanied by the addition of development requirements that provide protection of the site and/or additional mitigation measures necessary to address the unique or sensitive nature of the site.</p>	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			
<p><b>MM V.2:</b> Prior to the start of ground disturbance, all construction personnel involved with earth-moving activities should be informed that artifacts protected by law could be discovered during excavating. The training should include the appearance of common artifacts and proper notification procedures should artifacts be discovered. This worker training</p>	Prior to ground disturbance	Pre-construction	County of Placer Community Development Resource Agency			

**Mitigation Monitoring and Reporting Program  
Placer Retirement Residence Project**

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
should be prepared and presented by a qualified archaeological professional.						
<p><b>MM V.3:</b> Prior to the start of ground disturbance, develop a standard operating procedure, points of contact, timeline and schedule for the project so all possible damages can be avoided or alternatives and cumulative impacts properly accessed.</p> <p>If potential archaeological resources cultural resources, articulated, or disarticulated human remains are discovered by Native American Representatives or Monitors from interested Native American Tribes, qualified cultural resources specialists or other project personnel during construction activities, work will cease in the immediate vicinity of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from an interested Native American Tribe is present. A qualified cultural resources specialist and Native American Representatives and Monitors from culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. These recommendations will be documented in the project record. For any recommendations made by interested Native American Tribes which are not implemented, a justification for why the recommendation was not followed will be provided in the project record.</p> <p>If adverse impacts to tribal cultural resources, unique archeology, or other cultural resources occurs, then consultation with UAIC regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 should occur, in order to coordinate for compensation for the impact by replacing or providing substitute resources or environments.</p>	Prior to ground disturbance	Pre-construction	County of Placer Community Development Resource Agency			

## Mitigation Monitoring and Reporting Program

### Placer Retirement Residence Project

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcing Agency	Verification of Compliance		
				Initials	Date	Remarks
Paleontological Resources						
MM XIII: Prior to initiation of ground-disturbing activities, the applicant shall provide written evidence to the Planning Services Division that a qualified paleontologist has been retained by the applicant to observe grading activities and salvage fossils as necessary. The paleontologist shall establish procedures for paleontological resource surveillance and shall establish, in cooperation with the project developer, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of fossils. If major paleontological resources are discovered, which require temporary halting or redirecting of grading, the paleontologist shall report such findings to the project developer, and to the Placer County Department of Museums and Planning Services Division.	Prior to approval of Improvement Plans	Pre-construction	County of Placer Community Development Resource Agency			
Recreation						
MM XVI: The project applicant shall provide onsite active and passive recreational land that meets the requirement set forth in the Placer County General Plan. If onsite provision of sufficient active and passive parkland cannot be provided, the project applicant shall pay in-lieu fees consistent with the Placer County Park Dedication Fee Program (PDF Program) when a building permit is applied for. This fee will be used for the acquisition, improvement, and/or expansion of parks and recreational facilities within the community.	Prior to building permit issuance	Pre-construction	County of Placer Community Development Resource Agency			