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EL DORADO HILLS BUSINESS PARK



FINAL ENVIRONMENTAL IMPACT REPORT

PLANNING
ANSWERS
1982

EL DORADO COUNTY
RECEIVED

A SUPPLEMENT TO THE DRAFT EIR

OCT 8 1982

DEPT. OF PLANNING

SCH # 82070503

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I. INTRODUCTION

This Final EIR has been prepared in the form of an attachment or addendum to the Draft EIR (DEIR). This addendum consists of:

- a. Incorporation of the DEIR by reference.
- b. A list of persons, organizations and public agencies that received a copy of the DEIR.
- c. A list of persons, organizations, and public agencies to which the Final EIR has been referred for comment.
- d. A list of persons, organizations, and public agencies commenting on the DEIR within the required 30-day review period.
- e. Comments and recommendations received on the DEIR.

II. LIST OF AGENCIES AND ORGANIZATIONS RECEIVING THE DEIR

El Dorado County Planning Department
El Dorado County Supervisor Bob Dorr
El Dorado County Department of Environmental Health
El Dorado County Department of Public Works
El Dorado County Sheriff's Department
El Dorado County Air Pollution Control District
El Dorado County Local Agency Formation Commission
El Dorado County Library
El Dorado County Chamber of Commerce
El Dorado County Resource Conservation District
El Dorado Irrigation District
El Dorado Hills Fire Protection District
El Dorado Hills Community Services District
El Dorado Hills Area Planning Committee
El Dorado Hills Branch Library
El Dorado Union High School District
Buckeye School District
Latrobe School District
Sierra Planning Organization
Sacramento County Planning Department
Sacramento City Planning Department
Environmental Planning and Information Council
State Resources Agency
Air Resources Board
Department of Conservation
Department of Fish and Game
Department of Transportation
Central Valley Regional Water Quality Control Board
Department of Water Resources
Department of Parks and Recreation
Department of Health Services
Department of Housing and Community Development
State Office of Planning and Research

III. DISTRIBUTION LIST FOR THE FINAL EIR

El Dorado County Board of Supervisors

El Dorado County Planning Commission

El Dorado County Planning Department

El Dorado County Local Agency Formation Commission

El Dorado Union High School District

California Regional Water Quality Control Board, Central Valley Region

Department of Transportation, District 3

Department of Health Services, Environmental Health Division

Air Resources Board

State Office of Planning and Research

IV. LIST OF COMMENTS RECEIVED ON THE DRAFT EIR

A. LETTERS AND MEMORANDA

- | | |
|------------------------|--|
| (1) September 8, 1982 | Local Agency Formation Commission, El Dorado County, Gaby Box, Administrative Assistant |
| (2) September 15, 1982 | El Dorado Union High School District, Herbert J. Hemington, Ed. D. District Superintendent |
| (3) September 22, 1982 | California Regional Water Quality Control Board, Central Valley Region, Charles B. Mc Kinley, Area Engineer |
| (4) September 23, 1982 | Department of Transportation, District 3, Environmental Branch, R.D. Skidmore, Chief, Environmental Branch |
| (5) September 27, 1982 | Department of Health Services, Environmental Health Division, Richard P. Wilcoxon, Assistant Deputy Director |
| (6) September 30, 1982 | Air Resources Board, Gary Agid, Chief, Local Projects Support Branch, Regional Programs Division |
| (7) October 1, 1982 | State Office of Planning and Research, State Clearinghouse, Norma L. Wood |

B. PUBLIC COMMENTS

A public hearing on the DEIR was conducted on September 28, 1982. No comments were received at the hearing.

C. VERBAL COMMENTS

Bill Himenes, El Dorado County Air Pollution Control District.

V. RESPONSES TO COMMENTS

Under CEQA guidelines, the lead agency is required after completion of the DEIR to consult with and obtain comments from public agencies having jurisdiction by law with respect to the project and to provide the applicant and general public with opportunities to comment on the DEIR. The lead agency is also required to respond to significant environmental points raised in the review and consultation process.

The following responses to significant comments are organized by topic in the order found in the DEIR. Wherever possible, comments have been paraphrased.

A. BASIC PROJECT DATA

No Comments

B. DESCRIPTION OF PROJECT

No Comments

C. SUMMARY OF IMPACTS AND MITIGATION MEASURES

No Comments

D. LAND USE

No Comments

E. SOILS

No Comments

F. WILLIAMSON ACT CANCELLATIONS

No Comments

G. CUMULATIVE IMPACT OF THE WILLIAMSON ACT CANCELLATIONS

No Comments

H. EMPLOYMENT

No Comments

I. POPULATION - HOUSING - SCHOOLS

Comment: (Letter #2; The El Dorado Union High School District) According to the DEIR a 4,000 plus increase in high school students could occur within the next eight years. The County should consider a site for another high school site in its plans.

Response: The DEIR actually indicates that by 1990 the County could expect an increase of 400 students in the 15-19 age group. Additionally, 572 students were projected in the 10-14 age group as a result of this project. Generally speaking, students in the 13-18 age group are the prime high school age students. Even without the project the High School District is projecting an increase in student enrollment of over 1500 students in the next ten years which will result in overcrowded conditions. The District has a site in the El Dorado Area and is currently building a high school in the El Dorado Hills area. This area may be inappropriate for another high school site as the housing for the project may be located in another area.

J. WATER:

Comment: (Letter # State Office of Planning and Research) Since water supply is one of the most critical constraints to this project, the EIR should explore every possible way the project could minimize its water use.

Response: The DEIR discussed how manufacturing or processing water will be recycled since about 90% of the water used on site will be used for this purpose. The Office of Planning and Research correctly points out that there are other methods to further minimize water use. These methods include use of drought tolerant landscaping and mechanical devices that can be installed to reduce water consumption.

K. SEWAGE DISPOSAL

Comment: (Letter #7 State Office of Planning and Research) The DEIR should explain in more detail the operation and interaction of the on-site water treatment system with the off-site waste water treatment system of the El Dorado Irrigation District (EID).

Response: The DEIR includes a general description of a closed loop water system that will interact with the EID's waste water treatment facility. A consulting hydrologist has assured the applicants that such a system is feasible and practical. Details of the system were not included in the DEIR as the precise specifications and technical engineering work will not be completed until after the project is approved.

The applicant is working with EID and the Bureau of Reclamation for sewer and water service. The project is not feasible unless sewer and water service is available..

Comment: (Letter #3 Central Valley Regional Water Control Board) The Final EIR should include a committment from the El Dorado Irrigation District for connection into their waste water treatment plant.

Response: Obtaining a committment for annexation into the EID is beyond the scope of the Final EIR. However, the applicants will apply to LAFCO for annexation into the EID. Unless the site is annexed and a community type waste water treatment system is provided, it is highly unlikely the project could proceed.

L. FIRE PROTECTION

No Comments

M. SOLID WASTE

No Comments

N. TOXIC SUBSTANCES

Comment: (Letter #7 State Office of Planning and Research) Although it is not clear from the EIR whether hazardous chemicals will be stored or disposed of on site, either of these two processes will require a hazardous waste facilities permit from the State Department of Health Services (HDS). If hazardous wastes are transported off-site to a certified Class I landfill or treatment facility a hauler registered with the DHS must be used.

Response: Comments are a statement of permit requirements and are acknowledged. The County will attempt to notify industries, locating at the site, of State and local toxic waste permit requirements.

Comment: (Letter #7 State Office of Planning and Research) Toxic storage, handling, transport and disposal methods should be identified, along with any impacts created by the methods chosen. The DEIR should also identify the mitigation measures and safeguards to be employed and who will be responsible for their implementation.

Response: Specific storage, handling, transport and disposal methods cannot be defined at this stage of the project. Specific methods will be determined by the firms that locate to the site once the project is approved. Each firm may have different methods they wish to employ. The DEIR generally describes mitigation measures to reduce the potential hazards of toxic substances on page 49.

Comment: (Letter #7 State Office Of Planning and Research) information is available from the Department of Health Services on the use of safe chemical substitutes that might be useful in devising manufacturing systems that minimize the amount of toxic substance and/or facilitate recycling.

Response: Comment Acknowledged

O. GEOLOGY

No Comments

P. ARCHEOLOGY

No Comments

Q. NOISE

Comment: (Letter #5 Department of Health Services, Environmental Health Division) The adequacy of the section on noise is difficult to assess because data in support of statements such as " nor is traffic induced noise expected to exceed 65 DBA...." are not provided. Table I of the Traffic analysis indicates ADT's due to the project of about 59,000 in the year 2000. Such a volume of traffic, particularly if many heavy trucks are involved, may have significant noise impact on adjacent land uses. Of concern, is this residential area north of the site.

Response: The DEIR actually indicates that traffic noise may exceed 65 DBA periodically and vehicular traffic will probably have a noticeable affect on ambient noise levels in the area (page 53). Although the residential area to the north of the site will be impacted by this project this area is already a receptor of noise from from Highway 50.

Comment: (Letter#5 Department of Health Services, Environmental Health Division) High technology plants may include mechanical equipment which generate noise and may impact upon adjacent land uses.

Response: The proposed Research and Development Zoning prohibits the generation of significant noise beyond the exterior walls or buildings containing them. Outdoor activities can occur if they do not generate significant noise beyond the property line. Therefore, the zoning requirements should mitigate this potential adverse impact.

R. TRAFFIC

Comment: (Letter #4 Department of Transportation, District 3) CalTrans is concerned about the traffic projections identified in the report and their adverse impacts to Highway 50. By the year 2,000 Highway 50 will be operating at a level of service (LOS) E, which represents unstable flows. Discussion of a new interchange on page 11 implies that this interchange would mitigate the projected growth after 1990. It appears that this conclusion has over estimated the carrying capacity of the highway. Although a 10-20% reduction of impacts is predicted by implementing transportation system management (TSM) measures, congestion will still occur on the four-lane section of the highway east of the new interchange. Based on the minimum development proposed, traffic volumes will exceed 2000 vehicles per lane per hour.

Response: The DEIR indicates that by the year 2000, the highway will have unstable flows. The DEIR showed that all four intersections studied on Latrobe and El Dorado Hills would be in the failure mode and that a new interchange would not mitigate this. A 20% reduction in impacts results in LOS D and E on the surface streets as shown in Table 6 of the traffic study. When all the comments are read in context in pages 10 through 12 of the study, it can be seen that the new interchange would not mitigate year 2000 traffic volumes.

Comment: (Letter #4 Department of Transportation, District 3) The document does not mention mitigation measures for Highway 50 other than reducing the project size.

Response: Mitigation measures for Highway 50 include a new interchange, widening the eastbound off-ramp at Latrobe to provide a dual left turn lane and widening the westbound off-ramp at El Dorado Hills to provide a dual left turn lane. In addition to reducing the project's size, the implementation of transportation system management (TSM) improvements will improve traffic flow as discussed on Page 10 of the traffic study.

Comment: (Letter #4 Department of Transportation, District 3) The morning peak hour traffic volumes at eastbound off-ramp capacity. The eastbound on-ramp and westbound off-ramp would be at LOS F during the peak hour. Figure 5 indicates peak hour volumes on the westbound off-ramp. In the absence of additional highway capacity, the increase in traffic as a result of this project would reduce the level of service to an unacceptable level.

Response: Contrary to the Department of Transportation comments, volumes on the highway ramps are not at LOS F but are within acceptable volume levels provided that the new highway interchange is constructed. The range of 2377 to 3013 peak hour volume shown in Figure 5 of the traffic study, applies to northbound El Dorado Hills traffic and not the westbound off-ramp traffic.

Comment: (Letter #4 Department of Transportation, District 3) The construction of the new interchange proposed as mitigation would require approval by the California Transportation Commission. The funding of all mitigation measures to Highway 50, including the new interchange, added lanes, ramps and signals should be established prior to further development in this area. The State Planning Program does not presently include these improvements.

Response: Comment acknowledged.

Comment: (Letter #4 Department of Transportation, District 3 and Letter #6 Air Resources Board) The Final EIR should identify traffic and air quality mitigation measures in the form of policy statements supporting transportation system management (TSM). We urge that efforts be made to incorporate TSM measures into the project.

Response: TSM measures were included on page 12 of the traffic study, page 10 of the air quality study and pages 40, 55 and 57 in the main body of the DEIR. We agree with the Department of Transportation and the Air Resources Board that public transportation facilities and TSM measures are important and every effort should be made by State, El Dorado County and the applicants to implement such improvements. When specific development plans for the El Dorado Hills Business Park are formulated, specific TSM policies can be evaluated for project applicability.

S. AIR QUALITY

Comment: (Letter #6 Air Resources Board) The air quality impacts identified in the DEIR were based on a traffic analysis which did not consider the project at full buildout. CEQA requires that the entire project be identified.

Response: Section 15143 of CEQA requires EIR's to be prepared with a sufficient degree analysis to provide decision makers with information which enables them to make decisions that intelligently take account of environmental consequences. Based on this section, the test for adequacy is whether decision makers are provided with enough information in light of what is reasonably feasible.

The traffic and air impacts were based on employment projections that assumed that the electronics industry would be as labor intensive in the year 2000 as it presently is. However, in the future the electronics industry will probably be less labor intensive, as technological advances in robotics and mechanization will reduce labor intensity. The various consultants who prepared this EIR believe that estimating employment (from which the traffic and air calculations were made) beyond the year 2000 would be highly speculative and would inaccurately portray potential impacts. In our opinion the DEIR provides a reasonable description of impacts that are likely to occur.

Comment: (Letter #6 Air Resources Board) The DEIR does not address indirect impacts of the project on traffic and air quality as required by CEQA. The Final EIR needs to address the traffic and air quality impacts resulting from both the project and the activity resulting from the population and employment resulting indirectly from the project.

Response: Indirect impacts were incorporated into the traffic and air quality impact analysis by assuming an annual rate of area traffic growth of 5% per year until 1990, and 6% per year from 1990 to 2000.

Comment: (Letter #6 Air Resources Board) The DEIR's cumulative impact addresses only traffic generated from three projects and not other planned or proposed developments in the area.

Response: Cumulative impacts of the roadway system are incorporated by assuming a continued high rate of growth of non-project area-wide traffic as noted in the response above.

Comment: (Letter #6 Air Resources Board) The traffic section indicates a LOS on the roads within the project area to be at F. LOS F is forced flow and operation over capacity. Based upon such a low level of service and the high volume of traffic, the emissions calculated from the project do not appear to represent a worst case analysis, e.g., vehicle speeds are too high. Therefore, it is our recommendation that an analysis is to be performed using speeds normally attained a LOS F.

Response: Level of service refers only to traffic conditions at intersections not to the 10 to 15 miles of commuting distance assumed for most project related traffic. Speed reductions at control intersections are incorporated into traffic inputs shown on Page 6 of the air quality impact analysis by assuming a reduced mean travel speed over the entire trip to accommodate both the speeds of less than the mean at several major intersections plus speeds above the mean along the remainder of the travel route.

Comment: (Letter #6 Air Resources Board) The DEIR needs to describe the increase in traffic and air quality emissions impacts the project will have on Highway 50.

Response: Project impacts on Highway 50 and the resulting impacts of Highway 50 traffic growth are incorporated directly into the DEIR by assuming continued overall traffic growth on Highway 50. Future mean speed reduction was determined by adding the project generated traffic, to the regional growth and by utilizing the project plus cumulative growth. The first two tables in the air quality appendix specifically address air quality distribution near Highway 50 both east and west of the El Dorado Hills Interchange. The CALINE 3 line source dispersion Air quality model was used to determine these impacts. Although not discussed in the DEIR it is possible that the project may actually reduce traffic on Highway 50. As jobs are created locally, some county residents may abandon long distance commuting in favor of working at the site.

Comment: (Letter #6 Air Resources Board) The DEIR needs to discuss the difference in vehicle emissions calculated from vehicles miles traveled (VMT) and vehicle trips (VT). Trips starting in a cold start mode contribute the highest gram-per-mile of emissions.

Response: The difference between vehicle miles traveled (VMT) and vehicle trips (VT) emissions are significant mainly for short trips. Over the 9 to 15 miles of vehicle travel assumed for the air quality analysis, most of the vehicles will be in the hot, stabilized emission mode. The composite emission factor for the EMFAC6C computer model used for this analysis incorporated a significant percentage of cold start vehicles. The long driving distances used for the air quality analysis points out the need for stressing VMT reduction measures and project impact mitigation more than the VT reductions suggested by this comment.

Comment: (Letter#6 Air Resources Board) The DEIR needs to discuss how the project relates to the Air Quality Plans for both El Dorado County and Sacramento County.

Response: The DEIR authors believe that the project is consistent with the air quality Plans of both Counties. This statement is based on the fact that both counties assumed that new industrial development would occur, and as a result, the development and emissions were included in the projected growth for both Air Quality Plans.

T. IMPACTS NOT CONSIDERED SIGNIFICANT

No Comments

U. ALTERNATIVES TO THE PROJECT

Comment: (Letter #6 Air Resources Board) The DEIR needs to discuss each alternative's transportation and air quality impact.

Response: The development of a similar project in the Sacramento area will result in similar air quality impacts because prevailing winds will carry emissions into El Dorado County. Studies by the Air Resources Board indicate that western El Dorado County is heavily impacted by the Sacramento Metropolitan plume. Transportation impacts will vary depending upon where the project is located. Traffic has been a major impact in the development of many new industrial areas in Sacramento County. The DEIR points out that in some instances, developing other sites will merely transfer impacts from one location to another. Development of sites in Sacramento may have greater environmental impacts because of the proximity of higher population densities and better quality soils.

V. LIST OF PERSONS CONTACTED (Appendix J)

Comment: (Verbal Comment, Bill Himenes, Air Pollution Control District) The DEIR failed to recognize the Air Pollution Control District as one of the agencies that was contacted during the preparation of the DEIR.

Response: The Air Pollution Control District supplied the authors of the DEIR with technical studies. Their cooperation is appreciated and acknowledged.

VI. WRITTEN COMMENTS

Local Agency Formation Commission

El Dorado Union High School District

California Regional Water Quality Control Board

Department of Transportation

Department of Health Services

Air Resources Board

State Office of Planning and Research

EL DORADO COUNTY

INTEROFFICE COMMUNICATION

DATE: September 8, 1982

TO: Douglas J. Noble, Assistant Planning Director
Planning Department

FROM: *Gaby*
Gaby Box, Administrative Assistant
Local Agency Formation Commission

SUBJECT: Draft Environmental Impact Report
El Dorado Hills Business Park

The subject project is not within a fire protection district or water district at this time. Since annexation to both service districts is spoken to in the Draft Environmental Impact Report, LAFCO's concerns, for the most part, appear to be discussed.

However, there is concern with the availability of adequate water service to the project. Since the El Dorado Irrigation District has stated that no water or sewer service is available in that area in the foreseeable future, this concern should be carefully considered in the project review process.

Your review document is forthwith and hereby returned.

gnb

attachment

EL DORADO UNION HIGH SCHOOL DISTRICT

BOARD OF TRUSTEES

DOLORES A. GARCIA
H. DOUGLAS LATIMER
MARGARET A. STEIN
MICHAEL A. TARTLTON
LWIN F. VEERKAMP

DORADO COUNTY

RECEIVED

September 13, 1982

SEP 15 1982

ADMINISTRATION

HERBERT J. HEMINGTON, Ed.D.
Superintendent
ARTHUR B. CATE
Asst. Superintendent-Personnel
NORMAN R. MENZIE
Director - Educational Services

DEPT. OF PLANNING

Douglas J. Noble, Asst. Planning Director
El Dorado County Planning Department
360 Fair Lane
Placerville, CA 95667

RE: Euer Project
El Dorado Hills Business Park

Dear Mr. Noble,

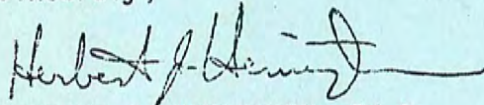
We are in receipt of your letter asking for comments on the enclosed EIR Draft for the development of El Dorado Hills Business Park.

At the present time the El Dorado Union High School District is operating with 86 portables on its various campuses. Even with the completion of Oak Ridge High School in the fall of 1983 we will still have a large amount of students unhoused.

If the Euer Ranch is allowed to develop into the El Dorado Hills Business Park, with light industry, the potential development of the surrounding area could generate an additional student population to our already overcrowded conditions. According to the EIR Draft they project with-in the next eight (8) years a 4,000 plus increase in students at the high school level. We are presently in need of one more high school without the development of Oak Ridge High School. With a project as large as this and with the potential growth to the area, we urge you to consider including a site for another high school in your plans.

We appreciate your soliciting our response on these projects. Should you need any further information, please do not hesitate to contact me.

Sincerely,



HERBERT J. HEMINGTON, Ed.D.
District Superintendent

HJH/fk

Memorandum

To : Ms. Norma Wood
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Date: 22 September 1982

From : California Regional Water Quality Control Board
Central Valley Region
3201 S Street, Sacramento, California 95816
Phone: 445:0270

Subject: EL DORADO HILLS BUSINESS PARK DRAFT EIR; SCH NO. 82070503

I have reviewed the above project and find that water quality will be adequately protected. The Final EIR should include a commitment from EID to annex the proposed assessment district, for connection to El Dorado Hills Wastewater Treatment Plant.

If you have any questions, please call me at 322-1595.

Charles B. McKinley
CHARLES B. MC KINLEY
Area Engineer

CBM/gs

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SEP 24 1982

State Clearinghouse

Memorandum

To : Mr. Ron Bass
Executive Officer
State Clearinghouse
1400 10th Street
Sacramento, CA 95814

Date: September 23, 1982

File : 03-ED-50
El Dorado Hills
Business Park
SCH 82070503

From : DEPARTMENT OF TRANSPORTATION

District 03

Subject:

Caltrans, District 03, has reviewed the draft EIR for the development of a high technology industrial business park on a 909-acre site south of Highway 50 and west of Latrobe Road.

Caltrans is concerned about the traffic projections identified in the report and their adverse impacts to the Highway 50 freeway. By the year 2000, the freeway will be operating at Level of Service E, which represents unstable flows. Discussion of a new interchange on page 11 implies that this interchange would mitigate the projected growth after 1990. It appears that this conclusion has overestimated the carrying capacity of the freeway. A possible 10-20% reduction of impacts is predicted on page 12 with implementation of TSM measures. Even a 20% reduction would still result in congestion on the four-lane section of the freeway east of the new interchange, with volumes over 2,000 vehicles per lane per hour. These volumes are based on the minimum development proposed.

The document does not mention mitigation measures for Highway 50 other than reducing the project size. Other impacts and mitigation to the freeway and interchange ramps need to be identified. The morning peak hour traffic volumes at eastbound Highway 50 and Latrobe Road would far exceed the eastbound off-ramp capacity. The eastbound on-ramp and westbound off-ramp would be at Level of Service F during the peak hour. Figure 5 indicates peak hour volumes on the westbound off-ramp ranging from 2,377 to 3,013 vehicles. It is doubtful whether the freeway could produce even 2,377 vehicles to a single off-ramp. In the absence of additional freeway capacity, the increase in traffic as a result of this project would reduce the level of service to an unacceptable level.

The construction of the new interchange proposed as mitigation would require approval by the California Transportation Commission. The funding of all mitigation measures to Highway 50, including the new interchange, added lanes, ramps and signals should be established prior to further development in this area. The State Planning Program does not presently include these improvements.

Mr. Ron Bass
Page 2
September 23, 1982

We do not wish to de-emphasize the importance of public transportation facilities and transportation systems management measures, as briefly discussed on page 12. Once again, we urge that efforts be made to incorporate into the project the types of facilities/options discussed in our letter of August 20, 1982. These include but are not limited to park and ride lots, bicycle trails and lockers, bus stops, ridesharing programs, flex-time and work shift scheduling programs.

LEO J. TROMBATORE
District Director of Transportation

By *R. D. Skidmore*
R. D. Skidmore
Chief, Environmental Branch

RECEIVED
SEP 28 1982
State Capitol Building

Memorandum

To : Ron Bass
STATE CLEARINGHOUSE
1400 Tenth Street, Room 121

Date : SEP 27 1982

Subject: Ever Ranch Ag.
Preserve Cancellation
SCH #82070503

From : ENVIRONMENTAL HEALTH DIVISION
714 P Street, Room 430
322-2308

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SEP 29 1982

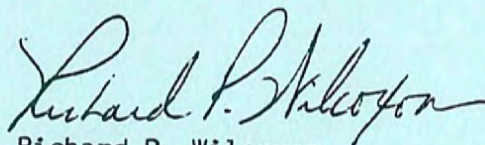
State Clearinghouse

The Department has reviewed the subject environmental document and offers the following comments.

The adequacy of the section on noise is difficult to assess because data in support of statements such as "... nor is traffic induced noise expected to exceed 65 dBA" (page 53) are not provided. In contrast, Table I of the traffic analysis (in Technical Studies section) indicates ADTs due to the project of about 59,000 in the year 2000. Such a volume of traffic, particularly if many heavy trucks are involved, may have significant noise impacts on land uses adjacent to the routes used. Of concern in this regard is the residential area north of the site.

In addition, high technology plants may include mechanical equipment (air conditioners, fans, emergency power supplies, etc.) which generate noise and may also impact upon adjacent land uses. If possible, these potential impacts should be evaluated.

If you have any questions or need further information concerning these comments, please contact Dr. Jerome Lukas of the Office of Noise Control at 2151 Berkeley Way, Room 613, Berkeley, CA 94704, 415/540-2665.



Richard P. Wilcoxon
Assistant Deputy Director

Memorandum

To : 1) Jim Burns, Projects Coordinator
Resources Agency

2) Douglas Noble
El Dorado County Planning Department
360 Fair Lane
Placerville, CA 95667

Date : September 30, 1982

Subject: Euer Ranch Agriculture
Preserve Cancellation, El Dorado
County, SCH No. 82070503

From : Air Resources Board

We have reviewed the draft environmental impact report (DEIR) for the Euer Ranch Agriculture Preserve Cancellation. The proposed Euer Ranch cancellation is one of 19 requests totaling 7,979 acres. The DEIR analyzes three applications for cancellation-- Euer Ranch (160 acres), Kimbur (909 acres), and El Dorado Hills (190 acres)-- and the request for the land to be rezoned to industrial uses.

Screening calculations performed by my staff indicate the project could generate more than 3 tons/day of carbon monoxide (CO) and 1 ton/day of hydrocarbon emissions. A major facility with equivalent emissions would be subject to El Dorado County's New Source Review rule and would be required to offset the emissions produced. It is logical that project-related emissions of these quantities be required to be mitigated in order to attain and maintain air quality standards.

We have the following concerns regarding the traffic and air quality analyses contained in the DEIR.

1. The air quality impacts identified in the DEIR were based on a traffic analysis which did not consider the project at full buildout. The California Environmental Quality Act (CEQA) requires that the entire project be identified (Section 15143).
2. The DEIR does not address indirect impacts of the project on traffic and air quality. The CEQA Section 15143(a) requires that EIRs "Describe direct and indirect significant effects of the project...." The DEIR summary states that "...the project could create up to 16,119 indirect jobs by 2000,...the project could result in 45,414 new county residents by 2000,...the project will create demand for 18,166 new housing units by 2000." The final EIR needs to address the traffic and air quality impacts resulting from both the project and the activity resulting from the population and employment resulting indirectly from the project.
3. The DEIR's cumulative impact addresses only the three proposal's traffic and not other planned or proposed development in the area. CEQA defines cumulative impacts as two or more individual effects which, when considered together, can result in a significant impact. Section 15023.5(b) states, "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects...."

4. The traffic section indicates a Level of Service (LOS) on the roads within the project area to be at F. LOS F is forced flow and operates over capacity. Based upon such a low level of service and the high volume of traffic, the emissions calculated from the project appear low. The assumptions used in the analyses do not appear to represent a worst case, e.g., vehicle speeds are too high. Therefore, it is our recommendation that an analysis be performed using speeds normally attained at LOS F.
5. The DEIR needs to describe the increase in traffic and the air quality emissions impacts the project will have on Highway 50.
6. The DEIR needs to discuss the difference in vehicle emissions calculated from vehicle miles traveled (VMT) and vehicle trips (VT). Trips starting in a cold start mode contribute the highest gram-per-mile of emissions. Therefore, reductions in VT are a more sensitive indicator of air quality changes than VMT.

The DEIR needs to identify measures that will be implemented to reduce the air pollution impacts. The mitigation measures identified on page 10 need to be more than "considered". Section 15143(c) requires that an EIR "Describe significant, avoidable, adverse impacts, ...and measures to minimize these impacts. The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures that are not included but could reasonably be expected to reduce adverse impacts. This discussion shall identify the mitigation measures which will eliminate such impacts or reduce them to a level of insignificance. Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified...."

The final environmental impact report should, at a minimum, identify air quality mitigation in the form of policy statements supporting Transportation Systems Management (TSM). These policy statements should target and facilitate the development of model ordinances to be included in subsequent specific plans for the project. To insure appropriate levels of TSM infrastructure support and program operation, the policies should set implementation goals and indicate that, where appropriate, TSM conditions will be attached to land use and business permits. TSM support policies could include commitments for park-and-ride lots, preferential parking for van/carpools, employer-directed ridesharing programs, bicycle lanes in and outside the project, and bicycle parking facilities at industrial and commercial establishments and places of employment.

Mr. Burns
Mr. Noble

-3-

September 30, 1982

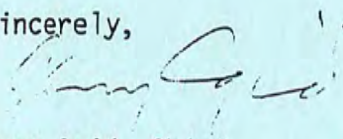
The DEIR identifies three alternatives to the proposed project. First, locating the project within Sacramento County, i.e., the Natomas area. Second, locating the project on existing vacant industrially zoned land in El Dorado County. Third, the no project alternative. The DEIR, however, needs to discuss each alternative's transportation and air quality impact. Section 15143(d) requires that an EIR "Describe all reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and why they were rejected in favor of the ultimate choice. The specific alternative of "no project" must also always be evaluated, along with the impact. The discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives substantially impede the attainment of the project objectives, and are more costly. If the environmentally superior alternative is the "no project" alternative then the EIR shall also identify an environmentally superior alternative among the other alternatives."

For example, in identifying the impacts, if the project were located in the Natomas area, the proposed project could result in 62% more VMT than if it was located in the Natomas area. This figure was derived by taking the estimated employee trips for the year 2000, for only the project, and multiplying it by an average trip length for the Natomas area. This equates to an increase in CO emissions of 48%. It is our recommendation, that the DEIR review in greater detail the alternatives in relation to achieving the same objective but with less of an impact on the environment.

The DEIR needs to discuss how the project relates to the Air Quality Plans for both El Dorado County and Sacramento County. Currently, El Dorado County is designated nonattainment for ozone. Sacramento is designated nonattainment for ozone, carbon monoxide, and total suspended particulate. Any incremental increases in emissions may delay these two areas in attaining the National Ambient Air Quality Standards. The CEQA, Section 15142(b) requires, "The EIR shall discuss any inconsistencies between the proposed project and...the applicable Air Quality Management Plan...." Therefore, the DEIR needs to discuss how this project may or may not be consistent with the goals and policies addressed in these two plans.

If you have any questions, please contact Sue Wyman of my staff at (916) 323-6317.

Sincerely,


Gary Agid, Chief
Local Projects Support Branch
Regional Programs Division

Mr. Burns
Mr. Noble

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September 30, 1982

cc: G. Stonehouse, SACOG
B. Cofer, Sacramento County ACPD
V. Peterson, El Dorado County APCD
A. Freitas, Sacramento County
N. Wood, OPR



State of California

GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

EDMUND G. BROWN JR.
GOVERNOR

(916/445-0613)

October 1, 1982

Mr. Doug Noble
El Dorado County Planning Department
360 Fair Lane
Placerville, CA 95667

SUBJECT: SCH# 82070503 - EUER RANCH AG PRESERVE CANCELLATION & REZONING
FOR EL DORADO HILLS BUSINESS PARK

Dear Mr. Noble:

State Clearinghouse review is complete for the draft environmental impact report prepared for the El Dorado Hills Business Park proposal. State agency comments are summarized below and attached in full. If you wish to discuss the concerns and recommendations contained in those comment letters, please contact the staff person listed by the agency.

AIR RESOURCES BOARD

Screening calculations indicate the project would generate more than three tons/day of carbon monoxide (CO) and one ton/day of hydrocarbon emissions. A major facility with equivalent emissions would be subject to El Dorado County's New Source Review rule and would be required to offset the emissions produced. It is logical that project-related emissions of these quantities be required to be mitigated in order to attain and maintain air quality standards.

Specific concerns are listed regarding the traffic and air quality analyses contained in the DEIR, including:

- . air quality impacts were based on a traffic analysis which did not consider the project at full buildout;
- . indirect impacts of the project on traffic and air quality are not addressed
- . cumulative impacts discussion includes only the 909 acres of Kimbur, the 160 acres of the Euers; and the 190 acres of Eldorado Hills when it should include all other closely related past, present, and reasonably foreseeable probable future projects;
- . emissions calculated from the project appear low and vehicle speeds are too high for a Level of Service F;

- . the DEIR needs to describe the increase in traffic and the air quality emissions impacts the project will have on Highway 50;
- . the DEIR needs to discuss the difference in vehicle emissions calculated from vehicle miles traveled (VMT) and vehicle trips (VT).

The DEIR needs to identify measures that will be implemented to reduce the air pollution impacts.

The final EIR should, at a minimum, identify air quality mitigation in the form of policy statements supporting Transportation Systems Management. These policy statements should target and facilitate the development of model ordinances to be included in subsequent specific plans for the project.

The DEIR identifies three alternatives to the proposed project, but does not discuss each alternative's transportation and air quality impact. ARB recommends that the DEIR review in greater detail the alternatives in relation to achieving the same objective, but with less of an impact on the environment.

The DEIR needs to discuss how this project may or may not be consistent with the goals and policies of the Air Quality Plans of El Dorado County and Sacramento County. Any incremental increases in emissions may delay these two areas in attaining the National Ambient Air Quality Standards.

CALTRANS DISTRICT 03

By the year 2000, the Highway 50 freeway will be operating at Level of Service E, which represents unstable flows. Discussion of a new interchange on page 11 implies that this interchange would mitigate the projected growth after 1990. It appears that this conclusion has overestimated the carrying capacity of the freeway.

The document does not mention mitigation measures for Highway 50 other than reducing the project size. Other impacts and mitigation to the freeway and interchange ramps need to be identified. In the absence of additional freeway capacity, the increase in traffic as a result of this project would reduce the level of service to an unacceptable level.

Construction of the new interchange would require the approval of the California Transportation Commission. The funding of all mitigation measures to Highway 50, including the new interchange, added lanes, ramps and signals, should be established prior to further development in this area. The State Planning Program does not presently include these improvements.

Caltrans urges that efforts be made to incorporate into the project the types of facilities/options discussed in their letter of August 20, 1982, including such things as park and ride lots, bicycle trails and lockers, bus stops, ridesharing programs, flex-time and work shift scheduling programs.

OFFICE OF NOISE CONTROL, DEPARTMENT OF HEALTH SERVICES

The adequacy of the section on noise is difficult to assess because some supporting data are not provided. The volume of traffic indicated, particularly if many heavy trucks are involved, may have significant noise impacts on adjacent land uses. Also, the impacts of potential noise generators of high technology plants (air conditioners, fans, emergency power supplies, etc.) should be evaluated.

CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

The final EIR should include a commitment from the El Dorado Irrigation District to annex the proposed assessment district, for connection to El Dorado Hills Wastewater Treatment Plant.

STATE CLEARINGHOUSE

Since water supply is one of the most critical constraints to this project, the EIR should explore every possible way that the project could minimize its water needs. The water conservation measures required by law and those recommended by the Department of Water Resources are attached to this letter for your information.

The EIR should explain more fully the operation and interaction of the on-site water treatment and recycling system with the off-site wastewater treatment system of the El Dorado Irrigation District. The agency responsible for the funding, operation, and maintenance of the on-site treatment facility should be identified.

Although it is not clear from the EIR whether hazardous chemicals will be stored or disposed of on site, either of these two processes will require a Hazardous Waste Facilities permit from the State Department of Health Services. If hazardous wastes are transported off site to a certified Class I landfill or treatment facility, a hauler registered with the same Department must be used. Toxics storage, handling, transport, and disposal methods should be identified, along with any impacts created by the methods chosen. The EIR should also identify the mitigation measures and safeguards to be employed and who will be responsible for their implementation.

Information is available from the Department of Health Services on the use of safe chemical substitutes that might be useful in devising manufacturing systems that minimize the amount of toxic substances and/or facilitate recycling.

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15146). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse number on all correspondence.

October 1, 1982

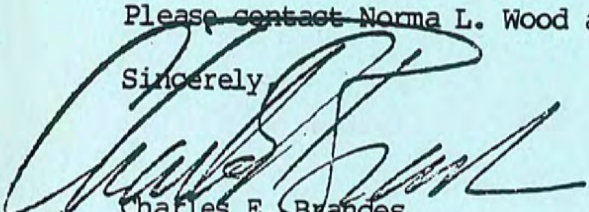
A 1981 Appellate Court decision in Cleary v. County of Stanislaus (118 Cal.App.3d 348) clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted. The responses should indicate any factors of overriding significance which required the suggestions or comments to be rejected. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information. The court further said that the responses must be a good faith, reasoned analysis.

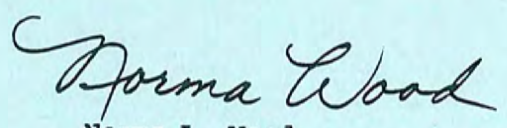
Section 15002 (f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project. These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect (Section 15088) and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (Section 15089).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk.

Please contact Norma L. Wood at (916) 445-0613 if you have any questions.

Sincerely,


Charles E. Brandes
Deputy Director
Projects Coordination


Norma L. Wood
State Clearinghouse

CEB/NW
attachments

cc: Resources Agency

EUER RANCH
DRAFT ENVIRONMENTAL IMPACT REPORT HEARING
September 28, 1982, 9:00 A.M.
Planning Commission Meeting Room

M I N U T E S

1. The hearing was called to order by Mr. Noble at 9:07. The following persons were in attendance:

Douglas J. Noble, Assistant Planning Director
Dennis Castrillo, EIR Consultant
Bill Cotton, Applicant
Don Beckman, WESTCO
Bob Cima, El Dorado Hills Fire Chief
Scott Wilson, Economic Development Coordinator, El Dorado County
Chamber of Commerce
Dave Robinson, Western National Real Estate

2. Mr. Noble read into the record the following letters:

Buckeye Union School District, 9/22/82 - Requested permission to keep Draft EIR for a meeting on October 6, 1982.

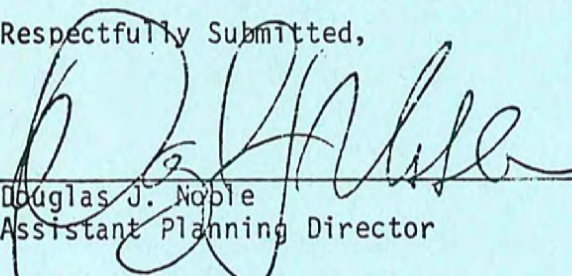
LAFCO, 9/8/82 - Commented on the need for annexations and concern with availability of sewer and water service.

El Dorado Union High School District, 9/13/82 - Commented on present overcrowding and need for another school site.

3. Mr. Noble then opened the public hearing. No one in the audience wished to speak.
4. Mr. Noble then closed the public hearing at 9:14, and there being no further comments, closed the hearing at 9:15.

(This hearing was recorded and the tape is available for review at the El Dorado County Planning Department during normal working hours.)

Respectfully Submitted,



Douglas J. Noble
Assistant Planning Director

DSN:jb