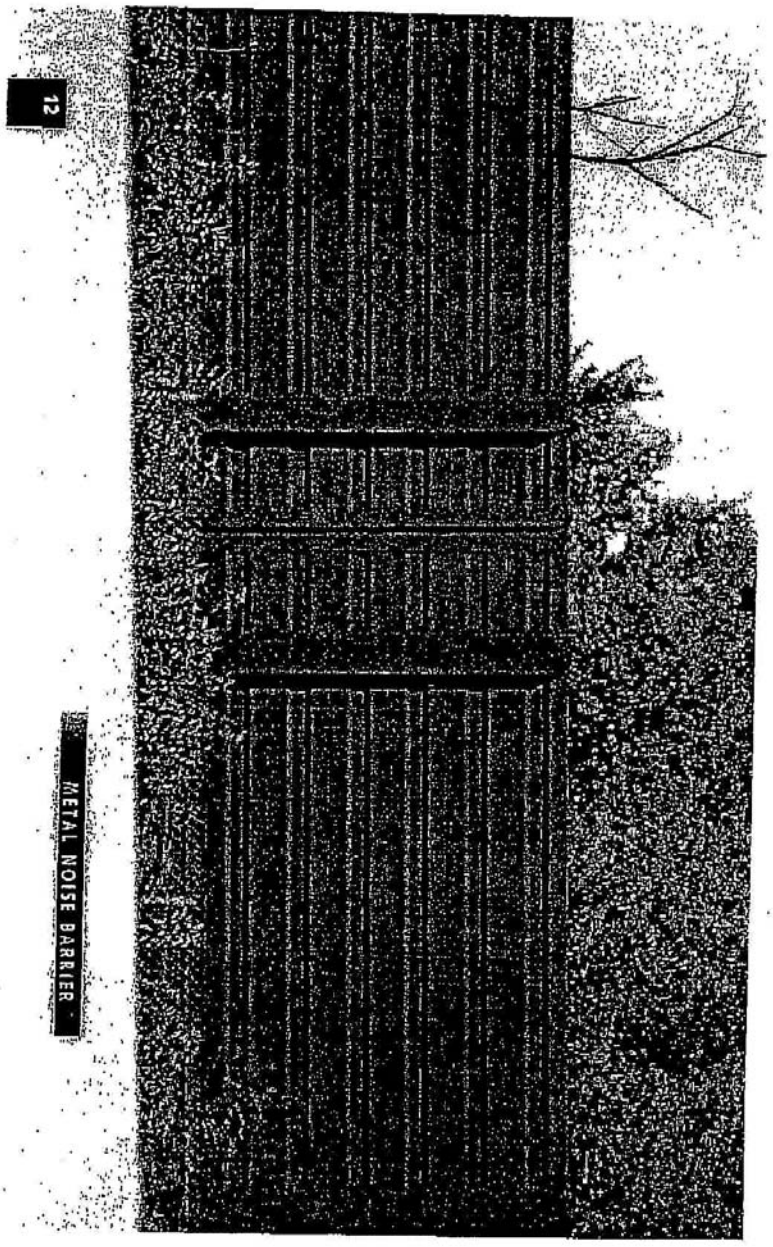

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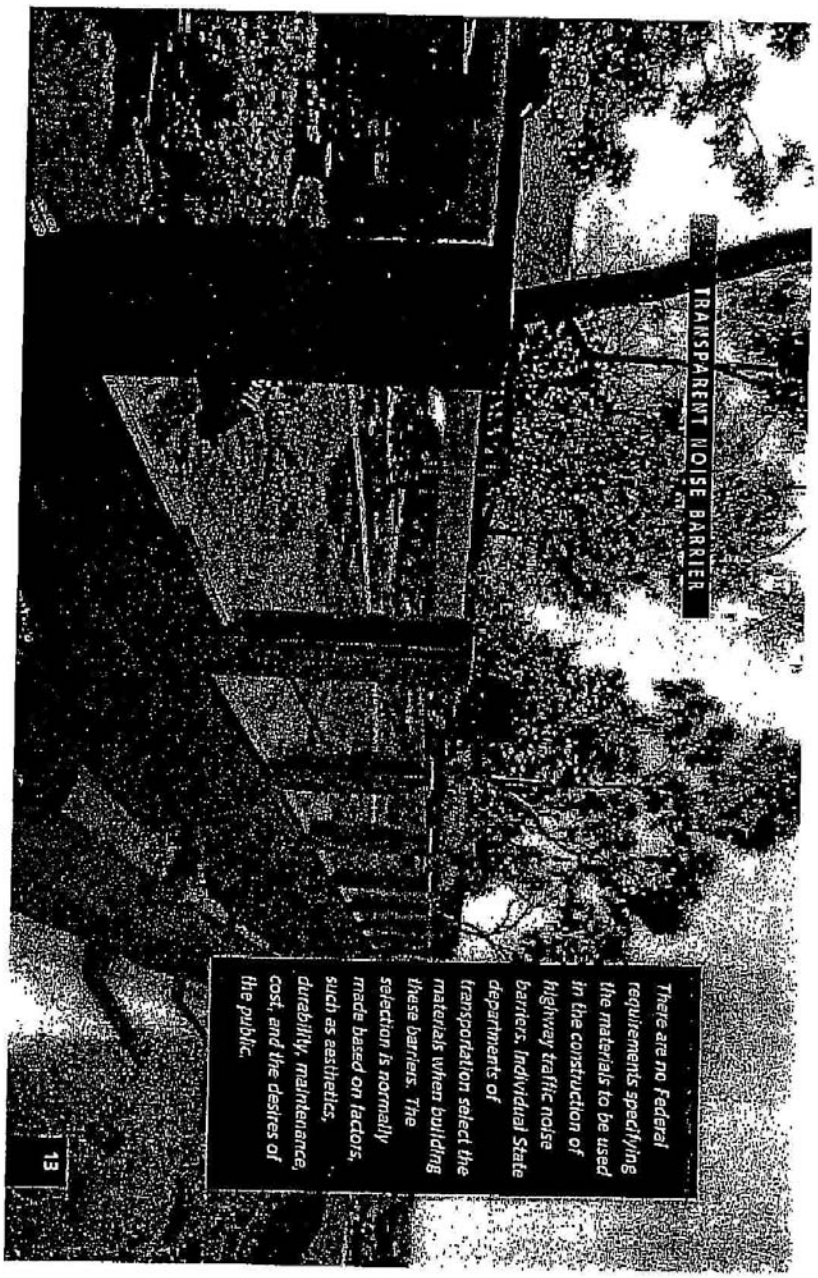

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How Do People React to Noise Barriers?

Overall, public reaction to highway noise barriers appears to be positive. However, specific reactions vary widely. Residents adjacent to barriers say that conversations in households are easier, sleeping conditions are better, the environment is more relaxing, windows are opened more often, and yards are used more in the summer. Residents also perceive indirect benefits, such as increased privacy, cleaner air, improved views and a sense of ruralness, and healthier lawns and shrubs.

Negative reactions from residents have included a restriction of view, a feeling of confinement, a loss of air circulation, a loss of sunlight and lighting, and poor maintenance of the barrier. Motorists have sometimes complained of a loss of view or scenic vistas and a feeling of being "walled in" when traveling adjacent to barriers.

Are Residents' Views Considered?

A major consideration in the design of a noise barrier is its visual impact on the surrounding area. A tall barrier near a one-story, single family, detached residential area can have a negative visual effect. One solution to addressing the size relationship in visual quality is to provide staggered horizontal elements to a noise barrier to reduce the visual impact by planting landscaping in the foreground. Native plantings are preferable.

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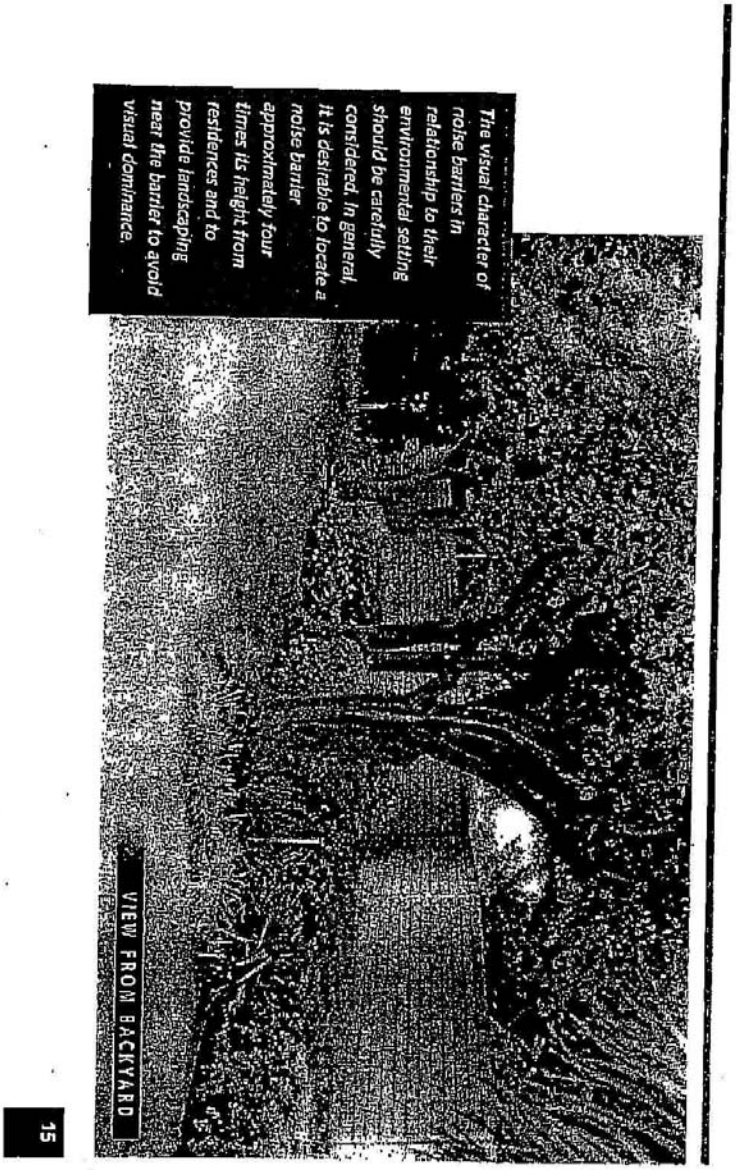

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Are Motorists' Views Considered?

VARIATION IN DESIGN

The psychological effect of noise barriers on the passing motorist should be a part of barrier design and construction. Noise barriers in dense, urban settings should be designed differently than barriers in more open suburban or rural areas, and they should be designed to avoid monotony for the motorist. At normal roadway speeds, motorists tend to notice noise barriers overall form, color, and surface texture. A primary objective of noise barrier design should be to avoid a tunnel effect for the motorist. This can be accomplished by varying the forms, materials, and surface treatments.

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Are Motorists' Views Considered?

The psychological effect of noise barriers on the passing motorist should be a part of barrier design and construction. Noise barriers in dense, urban settings should be designed differently than barriers in more open suburban or rural areas, and they should be designed to avoid monotony for the motorist. At normal roadway speeds, motorists tend to notice noise barriers overall form, color, and surface texture. A primary objective of noise barrier design should be to avoid a tunnel effect for the motorist. This can be accomplished by varying the forms, materials, and surface treatments.

VARIATION IN DESIGN

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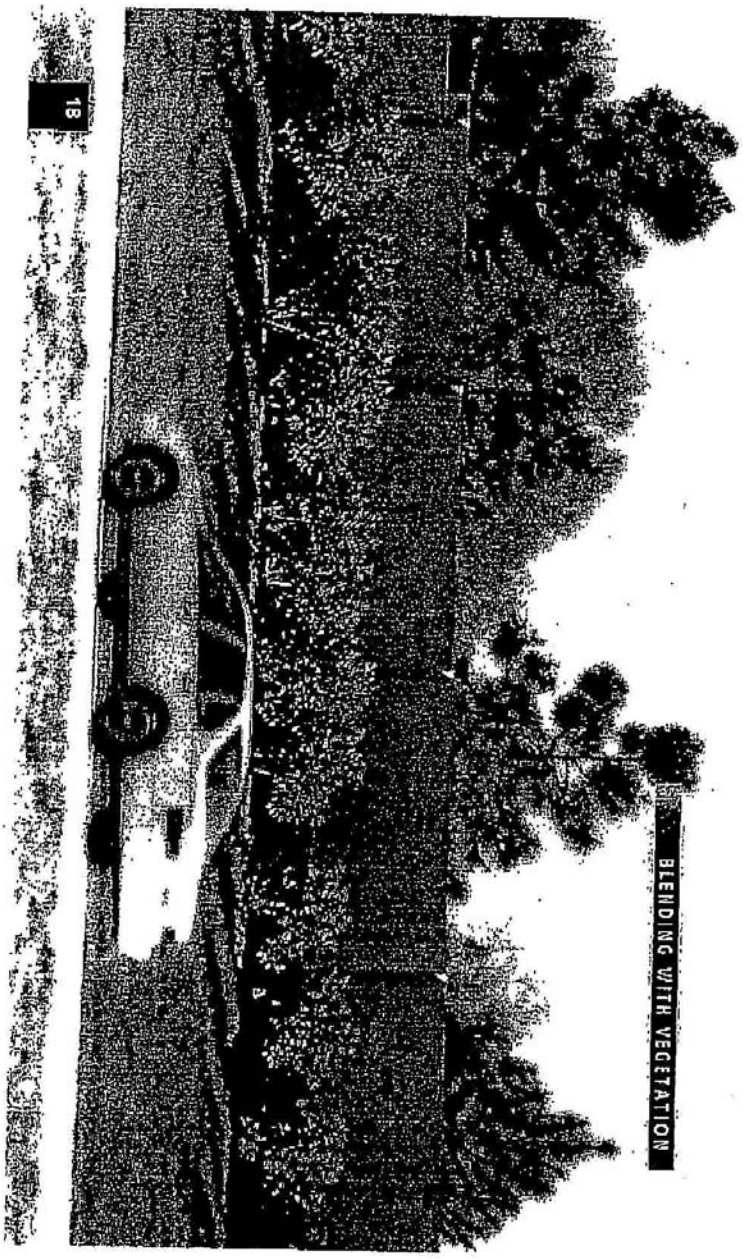

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Graffiti on noise barriers can be a potential problem. One solution is to use materials that can be readily washed or repainted. Landscaping and plantings near barriers can also be used to discourage graffiti, as well as to add visual quality.

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Does Construction of a Noise Barrier Increase Noise Levels on the Opposite Side of the Highway?

Residents adjacent to a highway sometimes feel that their noise levels have increased substantially, because of the construction of a noise barrier on the opposite side of the highway. However, field studies have shown that this is not true. If all the noise striking a noise barrier were reflected back to the other side of a highway, the increase would be theoretically limited to 3 dB. In practice, not all of the acoustical energy is reflected back to the other side. Some of the energy goes over the barrier, some is reflected to points other than the homes on the opposite side, some is scattered by ground coverings (for example, grass and shrubs), and some is blocked by the vehicles on the highway. Additionally, some of the reflected energy is lost due to the longer path that it must travel. Measurements made to quantify this reflective increase have never shown an increase of greater than 1-2 dB —an increase that is not perceptible to the average human ear.

Does Construction of Noise Barriers on "Both" Sides of a Highway Increase Noise Levels?

Multiple reflections of noise between two parallel plane surfaces, such as noise barriers or retaining walls on both sides of a highway, can theoretically reduce the effectiveness of individual barriers. However, studies of this issue have found no problems associated with this type of reflective noise. Any measured increases in noise levels have been less than can be perceived by normal human hearing, that is, less than 3 dB. Studies have suggested that to avoid a reduction in the performance of parallel reflective noise barriers, the width-to-height ratio of the roadway section to the barriers should be at least 10:1. The width is the distance between the barriers, and the height is the average height of the barriers above the roadway. This means that two parallel barriers 3 meters (10 feet) tall should be at least 30 meters (100 feet) apart to avoid any reduction in effectiveness. These studies have also shown that any reduction in performance can be eliminated through the use of sound absorptive noise barriers.

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Can Trees Be Planted to Act as Noise Barriers?

Vegetation, if it is high enough, wide enough, and dense enough that it cannot be seen over or through, can decrease highway traffic noise. A wide strip of trees with very thick undergrowth can lower noise levels. 30 meters of dense vegetation can reduce noise by five decibels. However, it is not feasible to plant enough trees and other vegetation along a highway to achieve such a reduction. Trees and other vegetation can be planted for psychological relief but not to physically lessen noise levels.

In Summary

Most residents near a barrier seem to feel that highway noise barriers effectively reduce traffic noise and that the benefits of barriers far outweigh the disadvantages of barriers. While noise barriers do not eliminate all highway traffic noise, they do reduce it substantially and improve the quality of life for people who live adjacent to busy highways.

Does Construction of a Noise Barrier Increase Noise Levels on the Opposite Side of the Highway?

Residents adjacent to a highway sometimes feel that their noise levels have increased substantially, because of the construction of a noise barrier on the opposite side of the highway. However, field studies have shown that this is not true. If all the noise striking a noise barrier were reflected back to the other side of a highway, the increase would be theoretically limited to 3 dB. In practice, not all of the acoustical energy is reflected back to the other side. Some of the energy goes over the barrier, some is reflected to points other than the homes on the opposite side, some is scattered by ground coverings (for example, grass and shrubs), and some is blocked by the vehicles on the highway. Additionally, some of the reflected energy is lost due to the longer path that it must travel. Measurements made to quantify this reflective increase have never shown an increase of greater than 1-2 dB —an increase that is not perceptible to the average human ear.

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LETTER 19: TOWN OF LOOMIS – MOONEY, DONALD B., ATTORNEY AT LAW

Response to Comment 19-1

This is a general introductory comment; specific comments from this letter will be addressed below.

Response to Comment 19-2

This comment is a description of the proposed project and does not address the adequacy of the DEIR.

Response to Comment 19-3

This comment is a description of the proposed project and project impacts and does not address the adequacy of the DEIR.

Response to Comment 19-4

This comment is a description of the history of the proposed project and does not address the adequacy of the DEIR.

Response to Comment 19-5

The commenter is correct in that the proposed project would be located in close proximity to the town of Loomis.

Response to Comment 19-6

This comment states that the proposed project would result in a population increase that would equate to approximately 25 percent of the current population of the Town of Loomis, which is located directly to the north of the project site. The projected population increase resulting from this project is anticipated to be approximately 1,451 new residents; the population of the Town of Loomis is approximately 6,250 persons. The population induced by the project would be 23.2 percent of the population of Loomis, and the comment is therefore correct. However, this comment does not directly address the adequacy of the DEIR, although later comments addressed below are tied to this population increase. Specific comments regarding the adequacy of the DEIR are addressed as they arise.

Response to Comment 19-7

This comment describes how the proposed project would alter existing traffic patterns and does not address the adequacy of the DEIR.

Response to Comment 19-8

The comment states that the DEIR is insufficient and does not adequately identify impacts or provide acceptable mitigation measures. Specific topics are addressed in Comments 19-9 through Comment 19-33 below.

Response to Comment 19-9

See Master Response 2 – Land Use regarding buffering of riparian areas.

Response to Comment 19-10

The DEIR correctly identifies a potential impact to the Sunset Whitney golf course as potentially significant and offers mitigation to allow a less than significant conclusion. See Master Response 2 – Land Use regarding buffering of riparian areas.

Response to Comment 19-11

See Master Response 2 – Land Use regarding buffering of riparian areas.

Response to Comment 19-12

See Master Response 3 - Aesthetics

Response to Comment 19-13

As noted in the comment, impacts related to views from Sierra College Boulevard and Loomis, north of the summit and across Sierra College Boulevard were found to be significant and unavoidable. The approval of the proposed project would require the City Council to submit a statement of overriding considerations, acknowledging the significant and unavoidable impact.

Regarding potential mitigation of this significant and unavoidable impact, the objectives of the proposed project include the preservation of Clover Valley Creek and other significant on-site natural resources through appropriate project design (page 3-11 of Chapter 3 of the DEIR, Project Description). Measures to mitigate the impact (though not to a less-than-significant level) would be implemented as part of the project description, including landscaping and other design features to help decrease impacts related to aesthetics and visual resources. The City did not determine that any additional mitigation beyond those included with the project design would be feasible. Additionally, the Alternatives chapter (Chapter 6 of the DEIR) includes several alternatives for the proposed project, such as the Maximum of 180 Units Alternative, which would decrease the total buildout of the proposed project and potentially decrease these impacts. See also Master Response 3 - Aesthetics.

Response to Comment 19-14

In accordance with CEQA Guidelines section 15126.2(b), the DEIR includes a description of five impacts addressed in the comment. These descriptions are included in impact discussions 4.3I-1, 4.3I-2, 4.3I-8, 4.3I-12 and 4.3I-13 and are illustrated through the tentative maps and site plans included within the DEIR. The DEIR notes that these impacts would be significant and unavoidable after the implementation of any suggested mitigation measures.

The Project Objectives section of the DEIR on page 3-11 of Chapter 3 includes the six primary goals that the proposed project aims to achieve:

1. Increase the City's housing supply in close proximity to existing transportation corridors.
2. Develop an economically viable project that provides a reasonable rate of return on investment for the landowner and is compatible with existing nearby neighborhoods.
3. Preserve Clover Valley Creek and minimize impacts on other significant on-site natural resources through appropriate project design.
4. Create a place to live that enhances neighborhoods by providing natural areas though the development and by providing access to the natural areas through visual and pedestrian links.
5. Construct the General Plan roadways approved as part of the 1995 Clover Valley Annexation EIR project.
6. Provide the regional benefit of creating a roadway connection from Park Drive to Sierra College Boulevard via the proposed Valley View Parkway and to establish an alternative evacuation route for residents in the northeast area of the City.

The achievement of these project objectives is the reason why the project is being proposed notwithstanding these significant and unavoidable impacts. The approval of the proposed project would require the City Council to submit a statement of overriding consideration.

Response to Comment 19-15

The commenter addresses the traffic volume levels on Valley View Parkway, and asserts that the DEIR is inadequate for not addressing the impact of non-project traffic utilizing this facility. As stated on page 4.4-4 of the DEIR, "intersections are a key component of the roadway system and serve as the 'nodes' that connect and interconnect all individual roadway segments of the system. The intersections are usually the critical elements of the roadway system in assuring adequate capacity, minimizing delays, maximizing safety, and minimizing environmental impacts." The study area, listed on pages 4.4-4 and 4.4-5 of the DEIR, includes the two key intersections of Valley View Parkway – with Park Drive to the west, and with Sierra College Boulevard to the east. Tables 4.4-4 and 4.4-6 include the intersection operating conditions for these key intersections.

The analysis of the adequacy of the intersection operations is based upon a comparison of total traffic volumes (non-project and project) to the intersection capacity. The volume projections for the Valley View Parkway intersections were developed utilizing the City of Rocklin's Travel Demand Model. This model forecasts the traffic volumes on the roadway network considering origins and destinations of trips, travel time, and delay. Thus, the traffic volume forecasts for Valley View Parkway include the diversion of non-project trips from other routes to Valley View Parkway if this route were favorable to the motorist.

Because the analysis of intersection adequacy is based upon total traffic volumes (non-project and project), the DEIR Transportation and Circulation section does not differentiate between non-project and project traffic. Instead, information is provided in the DEIR section based upon total traffic volumes. The RDEIR clearly analyzes the traffic impacts of traffic outside the project area which will use Sierra College Boulevard as a new east-west connector. (See, e.g., the discussion on page 4.4-30.) The comment's assertion that the RDEIR does not analyze such impacts is simply incorrect.

Response to Comment 19-16

As noted on page 4.4-15 of the Transportation and Circulation chapter, the proposed project would pay fair share fees to SPRTA, which would contribute to the construction of the planned improvements to Sierra College Boulevard listed on page 4.4-15 of the DEIR. Because the proposed project and other future developments would be required to pay their fair share to SPRTA for the future development of Sierra College Boulevard, the buildout of the proposed improvements is assumed as part of the cumulative condition. Though the project would contribute to increased traffic along Sierra College Boulevard, as noted in Figure 4.4-5, the traffic analysis for the proposed project did not determine that the proposed project would result in a significant impact when the improvements are put in place.

Typically, SPRTA fees are collected to fund improvements along Sierra College Boulevard, but projects having frontage are required do their own frontage improvements. However, even though the proposed project has frontage along Sierra College Boulevard, the applicant would be required to pay impact fees so that improvements are done on a linear, continuous section of the road. The SPRTA fee program is designed to implement the improvements with the fees it collects.

Response to Comment 19-17

The proposed project has been designed to meet the City of Rocklin's policies as they relate to emergency access. Specifically, the Community Safety Element of the City of Rocklin's General Plan includes policy 16 which states "To require projects to be designed with at least two points of access for emergency vehicles or for general circulation where such access is necessary to assure adequate egress and ingress." The proposed project includes not only the major roadway of Valley View Parkway that

provides ingress and egress for the project, but it also been designed to include numerous Emergency Vehicle Access points that provide each neighborhood area with at least two points of access, consistent with the City policy noted above.

Response to Comment 19-18

As stated on pages 4.4-14 and 4.4-15 of the DEIR, the South Placer Regional Transportation Authority (SPRTA) has been created to generate revenue to construct a program of transportation improvements, including improvements to Sierra College Boulevard throughout the area addressed by the commenter. These improvements will ultimately extend from SR 193 to Sacramento County, well beyond the immediate area of the railroad tracks. The project would contribute to funding of these improvements through a fee program. The improvement plans assumed more intense development on the Clover Valley site than currently proposed. These improvement plans have and will continue to address the issue of the subject railroad crossing. The improvement plans have been developed in accordance with applicable state and federal standards for roadway design, to ensure the safety of the public. The timing of the roadway improvements, as well as transit system projects, is subject to the collection of fees necessary to fund them.

By constructing Valley View Parkway as a connection between Park Drive and Sierra College Boulevard, the project provides a new route for residents and emergency service vehicles that avoids the subject Sierra College Boulevard railroad crossing. The new connection to Sierra College Boulevard does not involve a new railroad crossing, as it is located north of the location where the railroad crosses to the east under Sierra College Boulevard. Thus, in the event of a blockage at the crossing, both non-project and project traffic would have a new alternative route. Thus, the project does not cause undue risk to public safety due to effects at the railroad crossing.

In the existing plus project scenario, the intersection of Sierra College Blvd. and Taylor Road, adjacent to the at-grade crossing, is anticipated to operate at LOS "B" conditions in the p.m. peak commuter hour. This uncongested condition is not likely to lead to undue blockage of the railroad crossing, since the railroad crossing signal arms and safety lights are interconnected and coordinated with the traffic signal. In the 2025 Current General Plan Plus Project Scenario, operations at this intersection improve from LOS "E" to LOS "D" during the p.m. peak commuter hour, partly due to the diversion of traffic to Valley View Parkway. In the 2025 Proposed General Plan Plus Project Scenario, operations at this intersection remain at LOS "D" during the p.m. peak commuter hour, partly due to the diversion of traffic to Valley View Parkway. Thus, the project does not create undue risks at this location.

Response to Comment 19-19

The project will not affect the access of emergency service vehicles in a negative fashion. The transportation analysis indicates only minor changes in roadway operating conditions in the critical p.m. peak commuter hour (see Tables 4.4-4, 4.4-6, and 4.4-7). As stated in

the response to Comment 19-18, the project provides a new access route that avoids the subject railroad grade crossing, thus enhancing public safety and emergency vehicle access.

The transportation and circulation analysis is intended to evaluate effects in accordance with CEQA requirements. While the project would generate traffic that would cross railroad tracks, this does not automatically result in an undue risk to the public. The subject railroad crossing is an existing condition; fire and other emergency services currently operate with full knowledge of the crossing. While project traffic will utilize the crossing, it cannot be definitively concluded that this additional traffic will result in crashes that will block the railroad tracks. This would be an extremely rare event.

Response to Comment 19-20

The study area of the proposed project is based upon the magnitude of the traffic generated by the project and its anticipated routes in relationship to non-project traffic volumes and roadway capacities. The traffic generated by the proposed project is relatively small in comparison to the volumes accommodated by I-80 in the vicinity of the project. The study area does include the intersections of Sierra College Boulevard with the I-80 eastbound and westbound ramps, as well as the intersections of Rocklin Road with the I-80 eastbound and westbound ramps. The cumulative impacts of development on operations of the I-80 mainline and interchange ramps have been considered in the City's General Plan analysis and regional planning by Caltrans and others.

Response to Comment 19-21

As stated in the response to comment 19-20, the study area of the proposed project is based upon the magnitude of the traffic generated by the project and its anticipated routes in relationship to non-project traffic volumes and roadway capacities. Changes in traffic volumes at the subject intersections are projected to be small, as summarized in Table 3.3-1.

Table 3.3-1 Percent Changes in Daily Traffic Volumes Locations in the Town of Loomis		
	Location	
Scenario	**King Road west of Taylor Road**	**Horseshoe Bar Road northwest of I-80**
Existing Plus Project	Less than 2%	Less than 2%
2025 Current General Plan Plus Project	14%	Less than 2%
2025 Proposed General Plan Plus Project	4%	Less than 2%
DKS Associates, 2006.		

Response to Comment 19-22

The commenter asserts that the traffic analysis is incomplete because it does not consider "school-time" traffic. For analysis purposes, the p.m. peak commuter hour has been chosen because it represents the time of the highest traffic volumes on the roadway system. During time periods before and after school hours, traffic volumes on the roadway system are typically lower. In addition, a primarily residential development generates less traffic during these time periods than it does during the p.m. peak commuter hour. Field observations and a review of available traffic volume information provide no evidence that time periods before or after school would be more critical than the p.m. peak commuter hour.

Response to Comment 19-23

As stated on page 4.4-16, the project assumed the "current General Plan roadway network." The following is a list of key roadways assumed in the analysis, including segments of Sierra College Boulevard:

- Sierra College Blvd: widened to 6 lanes from Roseville City limit to Pacific Street/ Taylor Road intersection;
- Sierra College Blvd: widened to 4 lanes from Pacific Street/ Taylor Road intersection to SR 193;
- North Whitney Blvd: new 4-to-6 lane roadway from west of Whitney Oaks Drive to SR 65;
- Rocklin Road: widened to 4 lanes from east of Sierra College Blvd to city limit;
- Rocklin Road: widened to 6 lanes from I-80 eastbound ramps to east of Sierra College Blvd;

- Rocklin Road: widened to 6 lanes from west of Granite Drive to I-80 westbound ramps;
- Pacific Street/ Taylor Road: widened to 6 lanes from Roseville City limits to east of Sunset Blvd;
- Wildcat Blvd (formerly Sioux Street): extended from current terminus to Lincoln City limits;
- N/S Street in Northwest Annexation Area: new roadway from Sunset Blvd to North Whitney Blvd;
- Sunset Blvd: widened to 6 lanes from SR 65 to West Stanford Ranch Rd; and
- Sunset Blvd: widened to 6 lanes from Stanford Ranch Road to Pacific Street.

Response to Comment 19-24

A number of alternatives are considered in the DEIR, including the No Project and the Maximum of 180 Units, both of which would reduce impacts related to the commenter's concerns. See the Alternatives Analysis in Chapter 6 of the DEIR.

Response to Comment 19-25

See Response to Comment 19-26

Response to Comment 19-26

This comment and the following comment (19-17) apparently refer to Impact 4.4I-6 identified on page 4.4-31 of the RDEIR. As explained in the RDEIR and shown in Table 4.4-6, in 2025, development of the project will result in traffic conditions at the intersection of Sierra College Boulevard and King Road degrading from level of service ("LOS") "C" to LOS "F". (The majority of this increase in traffic is not due to trips generated from development of the project itself, but rather from the construction of Valley View Parkway, which will provide an alternate east-west route for future traffic which will occur regardless of whether the residences in this project are developed. The alternate route provided by Valley View Parkway will shift more traffic onto the intersection of Sierra College Boulevard and King Road.)

The RDEIR identifies specific improvements which could be made to the intersection of Sierra College Boulevard and King Road, which improvements would bring this intersection back to LOS "C". However, the RDEIR explains that, because this intersection is within the Town of Loomis, Rocklin does not have direct control over the improvements that take place at that intersection. Thus, the RDEIR deems this impact to be significant and unavoidable, even though the majority of the intersection improvements are contemplated by SPRTA, and additional widening of King Road may be constructed by the Town of Loomis. (See also Section 2 of Master Response 4 - Traffic)

The comment suggests that the impact could be mitigated by requiring the applicant to pay a fee to fund the identified intersection improvements, with the proceeds of the fee paid over to the Town of Loomis to fund the construction. The City of Rocklin finds such a measure infeasible for the following reasons:

First, the City could not legally require the project applicant to pay a fee to fund the entire cost of the improvement. Under AB 1600 (Gov. Code § 66000 *et seq*.), the City could only require the developer to pay a fee which would fund its fair share of the cost of necessary infrastructure based upon its proportionate impact on that infrastructure. As noted above, the construction of the additional homes within the project is not the cause of most of the additional traffic onto the identified intersection. Rather, the majority of the additional traffic is the result of construction of Valley View Parkway, which will provide an alternative route for traffic outside the project area. The City's General Plan calls for construction of Valley View Parkway regardless of whether this project is ever developed. One of the benefits of this project is that it will fund construction of Valley View Parkway, thereby providing an important new arterial identified in the City's General Plan. The City cannot require this developer to fund the cost of all other traffic improvements which may be necessitated simply by the construction of this new arterial, which the City has determined needs to be constructed regardless of whether this project is ever developed.

Second, the City does not believe it would be equitable to require its development projects to pay fees to fund improvements within the Town of Loomis, given that Loomis is not likewise providing any funding for traffic improvements outside its jurisdiction which its development may be impacting. As explained in the EIR (and as noted in the comment), in January, 2002, the cities of Rocklin, Roseville, and Lincoln, the County of Placer, and the Placer County Transportation and Planning Agency created a Joint Powers Authority (JPA) known as the South Placer Regional Transportation Authority (SPRTA). The purpose of SPRTA is to allow the various jurisdictions to cooperate together to develop a regional traffic fee, the proceeds of which is to be used to fund necessary regional traffic improvements to mitigate the cumulative traffic impacts of future development within the region. Loomis declined the invitation to participate in the creation of this agency. As a result, developers in Loomis are not required to pay the regional fee to mitigate their cumulative traffic impacts, and Loomis has no program in place to provide such mitigation. It would simply not be equitable for Rocklin to now provide for payment of fees to Loomis to fund traffic mitigation improvements within Loomis, when Loomis is not likewise providing funding for regional traffic improvements in areas outside its jurisdiction.

It should also be noted that the construction of Valley View Parkway will provide significant circulation benefit to Loomis, despite the fact that development within Loomis is providing no funding for this improvement. For example, as shown in Table 4.4-6, construction of Valley View Parkway is projected to actually improve traffic conditions at the intersection of Sierra College Boulevard and Taylor Road/Pacific Street from LOS "E" to LOS "D" in 2025. This intersection is also within the Town of Loomis. Thus, the

project will result in both traffic benefits and traffic burdens to different areas within Loomis.

Page 4.4-31 of the DEIR is hereby revised to read as follows:

> However, the Sierra College Boulevard and King Road intersection is in the Town of Loomis, not Rocklin, and thus the City of Rocklin has no direct control over improvements that take place at the intersection. Therefore, the increased traffic at the intersections of Sierra College Boulevard and King Road would result in a ***significant*** impact.
>
> Mitigation Measure(s)
> ~~Because the intersection of Sierra College Boulevard and King Road is in the Town of Loomis, and the City of Rocklin thus has no direct control over improvements at this intersection, the impact would remain *significant and unavoidable*~~. Implementation of the following mitigation measure would reduce the significant traffic impacts at the intersection of Sierra College Boulevard and King Road, but not to a less-than-significant level. Therefore, the impact is considered *significant and unavoidable.*.
>
> *4.4MM-6 Prior to final map approval, the applicant shall pay a "fair share" contribution, in an amount determined by the City of Rocklin, to the City Of Rocklin, toward the improvement of the intersection of Sierra College Boulevard and King Road. The fair share contribution shall be passed through by the City Of Rocklin to either the SPRTA or the Town of Loomis once final improvement plans for the intersection improvements identified under impact 4.4I-6 have been completed by the constructing agency.*

This revision does not result in changes in the environmental analysis of the DEIR.

Response to Comment 19-27

See Response to Comment 19-26 above.

Response to Comment 19-28 and 19-29

The commenter's points are noted. A variety of factors which affect noise barrier performance exist, but the most important factor is the relative geometry between the noise source, barrier, and receiver. Although barriers were not specified to shield second floor elevations, they are designed to provide shielding to back yard areas.

At the portion of Sierra College north of English Colony, the predicted future traffic noise exposure at a distance of 100 feet from the roadway centerline is 68 dB L_{dn}, thereby necessitating an 8 dB noise reduction from the combination of natural intervening topography and noise barriers to achieve satisfaction with the City's 60 dB L_{dn} criterion. At those residential locations north of English Colony, the proposed residences would be depressed relative to the Sierra College by approximately 10 to 20 feet. This depression will serve as a substantial natural noise barrier, which would be supplemented by the recommended 8-foot tall noise barriers.

At the portion of Sierra College south of English Colony, the predicted future traffic noise exposure at a distance of 100 feet from the roadway centerline is 70 dB L_{dn}, thereby necessitating a 10 dB noise reduction from a noise barrier to achieve satisfaction with the City's 60 dB L_{dn} criterion. At those residential locations south of English Colony, the proposed residences would be elevated relative to the Sierra College by approximately 20 feet. This elevation would similarly serve as a natural noise barrier, which would be supplemented by the recommended noise barriers. The nearest portions of the residential back yards located along Sierra College Boulevard will be approximately 125+ feet from the roadway centerline. The acoustical difference between the noise levels predicted at the standardized distance of 100 feet and the actual distance of approximately 125 feet is 2 dB. Therefore, the actual degree of noise reduction required will be closer to 6 and 8 dB at backyard locations along Sierra College north and south of English Colony, respectively. The combination of shielding provided by intervening topography following site grading and that provided by the recommended solid noise barriers is predicted to be adequate to reduce future traffic noise levels to 60 dB L_{dn} or less at these impacted locations.

Response to Comment 19-30

The comment states that DEIR should not rely upon the Historic Preservation Management Plan (HPMP), which is incomplete and confidential, because the public and decision makers cannot evaluate its feasibility. However, the City has determined that the preservation and security of the on-site cultural resources require treating the HPMP with confidentiality and discretion; therefore, disclosure and circulation of the HPMP's contents is limited to a "need to know" basis. This approach to treating an HPMP confidentially is expressed in section 304 of the National Historic Preservation Act (NHPA):

> The head of a Federal agency or other public official . . . shall withhold from disclosure to the public, information about the location, character, or ownership of a historic resource if the Secretary and the agency determine that disclosure may . . . risk harm to the historic resources . . . " (16 U.S.C. 470w-3(a) as amended through 2000)

However, it should be noted that although the HPMP is not available to the public, nor was made available to the State Office of Historic Preservation (OHP) during the CEQA process, the HPMP will be made available the OHP during the section 106 consultation process with the U.S. Army Corps of Engineers. Section 106 of the NHPA requires a federal agency with

licensing authority—in this case, the Corps—to consult with the OHP before permitting any activity that may impact a district eligible for inclusion on the National Register of Historic Places. Typically, Corps consultation with OHP occurs after the CEQA process is complete. During the section 106 consulting process, the HPMP would be made available to OHP for consultation in relation to mitigation measures for cultural resources at Clover Valley.

Response to Comment 19-31 and 19-32

See Section 1 of Master Response 12 – Public Utilities and Services for a further discussion of water supply for the Project.

Although the Placer County Water Agency (PCWA) indicates that water is provided on a "first come, first served" basis, it should be noted that PCWA routinely operates under this procedure in the event that a project should be denied or delayed and other projects arise with more immediate needs. More importantly, it is entirely appropriate for the City to rely on the expert testimony of PCWA, the professional agency charged with supplying water to the City, rather than the commenter's opinion as to the capability of PCWA to provide an adequate water supply. The PCWA Water Supply Assessment states that "the Agency has an adequate water supply to meet the anticipated build out demands of the Clover Valley subdivision in addition to the build out demands currently anticipated for 20 years [. . .] in normal, single dry and multiple dry years. PCWA cannot assert that they will definitely serve the project due to potential unforeseen delays that could prevent other projects from receiving water, but have stated their ability to serve the project should it require water in the near future as proposed. In sum, PCWA currently has water supply available to serve the project as it is proposed to be developed. However, they are stating that should the project be delayed for some speculative time out into the future, some of their additional planned infrastructure may be required for service. Neither PCWA nor the City is required to speculate as to what may happen if the project is not developed as proposed. It is the City's duty under CEQA to evaluate the Project as proposed.

Response to Comment 19-33

The comment states that the DEIR should not discuss factors other than environmental considerations in the alternatives analysis. However, as stated in the DEIR (p. 6-2), CEQA Guidelines section 15162.6(f)(1) says the following:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [. . .] and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [. . .]. No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

Contrary to the sentiment expressed in the comment that the DEIR overstates or misstates the role that these other factors play in "deliberations on the proposed Project," "CEQA

requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project" (CEQA Guidelines section 15093).

The comment further states that the DEIR misstates section 15126.6(e)(2) of the CEQA Guidelines. The comment is correct. Therefore, the DEIR is hereby amended to read as follows:

> The environmentally superior alternative must reduce the overall impact of the proposed project on the project site. The No Development alternative would eliminate all projected impacts to aesthetics, air quality, noise, biological resources, geology, hazards, hydrology and water quality, and public services and utilities, and would reduce impacts associated with cultural resources. Therefore, the No Development is the environmentally superior alternative. ~~;however, CEQA does not allow this alternative to be identified as the environmentally superior alternative~~ However, if the No Project Alternative is identified as the environmentally superior alternative, another alternative must be identified.

This revision does not change the environmental analysis provided in the DEIR.

Response to Comment 19-34

This is a general comment on the inadequacy of the DEIR. Specific comments regarding the DEIR are addressed in the Responses to Comments above.