

**Loma Rica Ranch Specific Plan
Environmental Impact Report**



GRASS VALLEY

NOV 10 2010

Community Dev. Dept.



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November 9, 2010

Thomas Last
Planning Director
City of Grass Valley
125 East Main Street
Grass Valley, CA 95945

**RE: Comments on the Loma Rica Ranch Specific Plan Project Draft Environmental
Impact Report**

Dear Mr. Last:

Nevada County has received the Notice of Completion (NOC) and Availability of a Draft Environmental Impact Report for the Loma Rica Ranch Specific Plan Project-SCH# 2008042067. In response to your request for comment, the County has reviewed the DEIR and appendices and has the following comments:

Transportation

1. The traffic analysis focuses on impacts to capacity at key intersections. It does not, however, address impacts to safety at existing intersections. For example, both Brunswick/Idaho Maryland and Brunswick/Whispering Pines have sight distance and other geometric issues which have resulted in historic accidents rates that are higher than normal. A significant increase in traffic is forecast to each of those intersections. Unmitigated, there could be an impact on safety in addition to capacity.

For each of those intersections, mitigations were suggested that would likely mitigate safety issues. For example, the Dorsey Interchange would draw a significant amount of traffic away from the Brunswick/Whispering Pines Intersection. Similarly, the realignment of Idaho Maryland at Brunswick would mitigate most of the geometric issues at the existing location. However, other mitigations were included for Brunswick/Idaho Maryland (such as a roundabout at the existing intersection location) which do not mitigate existing geometric problems. The document should therefore include intersection safety as well as capacity in the evaluation of mitigations.

9-1

2. The project generates 342 peak hour trips onto Idaho Maryland east of Brunswick. Figure 4.15-7b shows those trips distributed nearly evenly to destinations eastbound and

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westbound on Brunswick. 2001 traffic counts at Loma Rica Drive show only 10% to 20% of the trips going to the south, with the majority of trips going north to either Idaho Maryland or continuing on to access Highway 20 at Brunswick. It appears that a significant number of the trips going south on Brunswick (101 vehicles during the peak hour) are actually using Whispering Pines to access Idaho Maryland to the west. In the PM peak, those trips are turning right onto Whispering Pine from Brunswick, and therefore should not present any additional safety problems at that location. However, assuming those trips take the same route in the AM peak, that would result in over 100 additional trips turning left from Whispering Pine onto Brunswick in the AM peak. Given the limited sight distance, large cross slope, and large longitudinal slope of that intersection, these additional trips could increase the accident rate at that location. This potential impact should be addressed. The Dorsey extension discussed under the cumulative project impacts would seem to divert these trips and reduce a potential safety impact.

9-2

3. Impact 4.15-1 indicates the street segment between Dorsey Drive Extension and Idaho Maryland Road on Brunswick operates at acceptable conditions. Figure 4.15-7b implies that the analysis was based on an Idaho Maryland/Brunswick configuration which prohibited through movements on Idaho Maryland. However, 4.15-9 indicates a roundabout configuration was used for the analysis. With a roundabout, the through movement on Idaho Maryland would be reestablished. Since there is only 200' between these two intersection locations and therefore queuing could be an issue, it would be helpful to provide the detailed analysis of this roadway segment to clarify which configurations and which volumes were included in the analysis.

9-3

4. Clarification is needed regarding the suggested mitigation for the Brunswick/Idaho Maryland intersection. Impact 4.15-6 suggests two mitigations for the Brunswick/Idaho Maryland intersection.

- The first is a realignment of Idaho Maryland to the north, replacing the existing intersection with one that reestablishes all the previously eliminated intersection movements. As part of that realignment, it appears that Dorsey Extensions has been realigned to connect to Idaho Maryland rather than Brunswick.
- The second places a roundabout at the existing location (also shown in Fig. 4.15-9
- Impact 4.15-12 references a County developed mitigation, which I believe refers to a plan to connect the Dorsey Drive extension with east leg of Idaho Maryland at a roundabout intersection.
- Finally, Appendix AA shows a geometric configuration of the Brunswick Idaho Maryland intersection which shows signalization of a widened intersection at the existing location.

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It would be helpful for the EIR to clarify which mitigations will be implemented.

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5. Impact 4.15-6, Mitigation Alternative 2 indicates “the installation of a roundabout has been shown to reduce the number and severity of accidents”. U.S. Department of Transportation publication “Roundabouts: An Informational Guide - June 2000” indicates in section 6.3.11.3 that a roundabout with approach grades steeper than 4% should be relocated or the vertical profile modified. The existing northbound approach slope is greater than 8%. The document should cite a source for roundabout accident reduction with steep approach grades, or delete the statement about accidents and recognize the potential for accidents with steep approach grades.

9-5

Agricultural: Farmlands of Local Importance

6. The DEIR finds that the project will result in the conversion of 97-acres of Farmlands of Local Importance to a non-agricultural use, identifying the conversion as a less than significant impact. The DEIR however does not provide adequate mitigation to offset the loss of important farmlands. The lack of adequate mitigation to offset the conversion of the site's Farmlands of Local Importance is a flaw in the DEIR because the conversion would have a negative effect on the availability of productive agriculture in that area of the County. The conversion of 97-acres of Farmlands of Local Importance to a non-agricultural use along with any indirect conversion of adjacent agricultural lands is a significant impact to agricultural resources in Nevada County and therefore the DEIR should be revised to include adequate mitigation for this conversion or if no feasible mitigation can be identified, than development on the Farmlands of Local Importance should be avoided.

9-6

Environmental Health: Hazards

7. Environmental Health's review of the Loma Rica Ranch DEIR indicates inadequate analysis and proposed mitigations relative to the hazards relating to historic mine features, former domestic dump site and contamination.
8. The DEIR states that a No Further Action (NFA) letter has not yet been obtained from the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) for remedial actions that have occurred at the site. The DEIR fails to discuss and provide analysis as to the reason why a NFA has not been obtained.
9. DTSC prepared a Deed Restriction for the property on August 31, 2009. The Deed Restriction is required by DTSC because arsenic remains present at mining areas M1 & M2 that do not allow these areas to be available for unrestricted use and requires a 100-foot buffer around each area. The DTSC further concluded the following prohibited uses for these areas: a residence, a hospital, a public or private school, a day care center, drilling for water, development of trails or roads, use of the area for any recreational purposes, excavation or disturbances of soils without DTSC prior approval. The Deed Restriction has not been recorded.

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