

Central Sierra Environmental Resource Center

Box 396 • Twain Harte, CA 95383 • (209) 586-7440 • FAX (209) 586-4986

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Keith Dunbar
Environmental Engineering
K.S. Dunbar & Associates, Inc.
3035 Calle Frontera
San Clemente, California 92673-3012

Re: The Ridge at Trinitas EIR Scoping

Dear Mr. Dunbar:

The Central Sierra Environmental Resource Center (CSERC), respectfully submits these comments as part of The Ridge at Trinitas EIR scoping process. After a site visit with Susan Larson on January 25th, our Center has a number of concerns that we believe should be analyzed in the Draft Environmental Impact Report (DEIR).

Environmental Baseline

A significant amount of illegal, never-approved bulldozing, grading, stream alteration, and habitat altering activities was done by the applicant prior to the filing of this application. The impacts of this work have never been mitigated. Our Center believes that the analysis in the DEIR should be based upon an appropriate environmental baseline. Consequently, we strongly urge that the DEIR begin with and assess the environmental conditions that were present before the unapproved creation of the golf course. Those prior conditions should be the starting point for the evaluation of The Ridge at Trinitas' environmental impacts. It would be unacceptable for the DEIR to not address and provide mitigation for several impacts that have already occurred as part of this overall project and for which no permits from county, state, and/or federal authorities were obtained by the applicant.

Biological Resources

The DEIR should address all project-related impacts to the oak woodland and describe how the approved project would comply with the recently adopted California oak conservation law. The DEIR should specifically explore the possible impacts to oaks resulting from the application of water onto the golf

course. How can the loss of oaks resulting from over-watering be prevented or minimized? How can long-term retention and protection for the large oaks on the site be assured?

From our visit, it is apparent that the project site contains a section of Cosgrove Creek as well as numerous other ponds and sensitive wetland areas. These areas appear to have been substantially altered from their natural conditions by the recent activities associated with the construction of the golf course. Stream courses have been graded, re-aligned, lined with riprap, and in some cases, completely lined with rock. Ponds have been graded, dredged and enlarged. Natural riparian vegetation (including willows, reeds and cattails) has been removed. All of this work has taken place, apparently, with no oversight, no input from concerned agencies, nor any necessary permits.

While the applicants may argue that the water courses have been "enhanced", or that their condition has been improved compared with that of adjacent grazing land, the overall work may have resulted in negative impacts. The past grazing and stream-work, combined with the further construction of the golf course and its associated activities may significantly harm the biological integrity of the water courses and riparian habitat. If this site had remained grazing land, then the worst possible disturbance would have come from livestock grazing. With the golf course, however, riparian habitat and riparian-associated wildlife are being subjected to chemical herbicides and fertilizers, intense mowing, constant mechanical clearing of vegetation, and the unnatural placement of riprap and lining of watercourses with stone.

CSERC strongly urges that the EIR retroactively examine the impacts of golf-course construction, the conspicuous lack of riparian vegetation in many locations, and the planting of golf course sod adjacent to the water bodies. We also ask that the DEIR include measures to mitigate impacts where the streambed, vernal pools, ponds, and other wetlands have already been altered or disturbed or what riparian and emergent vegetation has been removed. The DEIR should provide mitigation for all of these impacts by requiring habitat restoration and offsite conservation easements to mitigate for the golf course's impacts to these areas. Possible mitigation measures should also consider re-introduction of species that may have been affected by golf course construction, such as the California tiger salamander and the California red-legged frog.

The stream, ponds, vernal pools and other wetland habitats all area likely to be affected by the frequent application of fertilizers, fungicides, and pesticides needed to maintain a golf course. We ask that the DEIR analyze this potential impact. We suggest that the DEIR include stream setbacks and buffers to mitigate for any possible negative consequences caused by these chemicals running off of the golf course and into water bodies.

Due to the presence of wetland resources, there is the potential for numerous sensitive and unique species, including the California red-legged frog (*Rana aurora draytonii*) and the California tiger salamander (*Ambystoma californiense*) to be present on this site. Hence, we ask that the DEIR evaluate potential impacts to

special status species. Any mitigation should include scientifically rigorous biological surveys in the appropriate season to determine whether at-risk species are present. More generally, we also ask that the DEIR consider the impact of this project on the habitat requirements of more common wildlife and plant species.

Growth Inducement

This project is likely to stimulate growth in the immediate vicinity of the project site in numerous ways. The creation of a golf course often encourages nearby development. The economic pressures to develop additional residences near the project site will escalate as the land values increase due to the presence of the golf course. Our Center is concerned by the potential for major growth inducement on nearby parcels, especially those of 40 acres or larger. It appears that the Calaveras General Plan currently designates some of these parcels as agricultural. As a result, the placement of a golf course next to Ag land is likely to result in *unplanned growth not anticipated by the General Plan*. Hence, the DEIR needs to specifically identify the potential growth inducement impacts for specific parcels, including but not limited to: APN 050052001000, APN 050052010000, 050052009000, 050052040000, 050052044000, 050052044000, 050052007000 and 050001109000.

This project will reduce the current infrastructural barriers for parcels along both Southworth Road and Ospital Road. Hence, we ask that the final EIR include a discussion of potential effects of the requisite infrastructure improvements on the permitted maximum density of all parcels adjacent to any improvements. For example, if the necessary road improvements change the base level of service from D, E, or F to A, B, or C, the Calaveras General Plan permits increases in residential density on parcels served by these roads and designated as Future Single Family Residential. This effect should be recognized and evaluated. Parcels that are currently developed with a single-family residence should not be excluded from this analysis, since it is likely that some of these individuals will decide to split their parcels or be bought out once the value of their land increases to reflect the proximity of The Ridge at Trinitas golf course project.

In a past EIR process, Calaveras County has claimed that limiting discretionary entitlements required for intensification of residential development or the conversion of agricultural land could control new growth surrounding major projects. We do not accept the argument that the County can entirely mitigate the growth inducement impacts of The Ridge at Trinitas through the land planning process. General plan amendments and associated rezones are common in Calaveras County and increasingly frequent in the immediate vicinity of this project. Additionally, growth inducement is an economic as well as a political phenomenon and therefore cannot be mitigated solely through political means. For instance, the County cannot change the fact that approval of this project will generate market forces that create intense pressure to subdivide nearby land.

It appears that the requested density would conform to the 1 unit per 20 acre zoning. Nevertheless, a permanent conservation easement, development agreement, or other legal instrument should be included as a mitigation measure to ensure that additional future development does not further harm wildlife and open space on this site.

Hydrology and Water Quality

The potential effect from fertilizers, fungicides, and pesticides used in conjunction with the golf course could affect the onsite water quality; we ask that the EIR review this issue. There are also other water quality issues that need to be addressed in addition to potential contamination from landscaping chemicals. What are the estimated total daily loads of sediment and other pollutants from this project and cumulative development that may enter into the water bodies? The overall water resource review should include consideration of all pollutants generated by site development, as well as post development operations of the development and golf course. With that information, the applicant should lay out a specific plan to reduce chemical contamination of water bodies within or near the site, and a plan to restrict sediment movement into riparian areas, streams, and ponds.

This project is likely to significantly change the flow patterns of Cosgrove Creek as well as the drainage of the site. Thus, we ask that the DEIR assess the changes in quantity and surface water patterns that could result from the implementation of this project. The DEIR should not fail to examine whether the proposed system of drainage features will actually be a viable system over the long term. The DEIR should effectively mitigate for the significant impacts to the natural drainage system.

By removing the vegetation from the stream banks and around the ponds, the project also has the potential to negatively affect the water quality both downstream and on the site. We are also worried that the lack of substantial riparian vegetation along the drainages could destabilize their banks and therefore ask that the DEIR also consider this possibility. One way to mitigate would be to require reestablishment of cattails, willows, or other riparian vegetation.

Water Supply

This project's potential impacts to groundwater also need to be carefully examined in the DEIR. Golf courses are known to be large consumers of water. With the long summer dry season accompanied by high temperatures of the lower foothills, this golf course will surely require large amounts of groundwater and experience significant evaporation. The evaporated water will not return to the underground aquifer and will be effectively eliminated from the system. The DEIR needs to consider the long-term sustainability of locating a highly consumptive use in this area and the impacts this could have on the surrounding area.

Cumulative Impacts

A thorough and rigorous analysis of the Cumulative Impacts of this project is essential to a complete evaluation of the environmental consequences of this project. This section should include a discussion of the future foreseeable land uses and related housing density in the surrounding area if this project approved.

A reasonable Cumulative Effects analysis would attempt to analyze and identify the cumulative water quality impacts of all development in the area and along Cosgrove Creek. Another assessment would be to evaluate the cumulative impacts of habitat loss resulting from this project in combination with future foreseeable development? As this rural agricultural area begins the transition to a residential section of Calaveras County, how will wildlife movement be affected and habitat needs be managed? These are the types of questions that should be answered in the cumulative impacts section.

Traffic

Our Center is also concerned that the DEIR properly evaluate potential traffic impacts of this project, since this project is likely to add significant traffic to a predominantly rural area. The project will also create additional demands on the Southworth Road and Highway 12 intersection. At a minimum, both of these potential effects should be evaluated in a traffic study. Also, since the surrounding areas are undergoing rapid growth and are likely to dramatically increase in population, the traffic study should include an "existing plus project" section to properly analyze the cumulative traffic impacts of this project over time.

Both Ospital Road and Southworth Road are old country lanes that have numerous safety issues. These roads have vertical and horizontal safety issues, a road base depth that does not appear to meet modern standards, and dangerous, inadequate lane shoulders. It appears that these roads will have to be improved to meet the additional traffic that will be generated by this project application. Thus, we ask that the DEIR address the direct and indirect environmental consequences of modernizing these roads. For instance, will any trees along the roadsides need to be removed to accommodate these changes?

Air Quality

The DEIR should include mitigation measures to address the cumulative impacts of NO_x and PM-10 emissions emitted during the construction and operation phases of this project. Since Calaveras County is designated as a non-attainment zone for the federal 8-hour and state CAAQS ozone standards, these emissions are likely to add to the existing violation of standards.

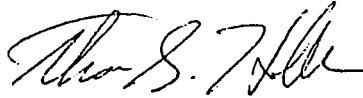
The emissions of on-site construction equipment and trucks used during construction activities can be mitigated through a number of federal and state identified emission control techniques. The DEIR could require that all diesel construction equipment be prohibited from idling for more than 5 minutes. The DEIR could also stipulate that the construction equipment used for the project construction be documented as properly maintained. Finally, the DEIR could evaluate whether requiring the use of construction equipment that utilizes the best available emission control technologies for heavy-duty diesel engines is necessary to reduce impacts to a less than significant level.

The DEIR also needs to consider the air quality impacts that would result from the vehicle trips by residents, vehicle trips by workers and service personnel, vehicle trips resulting from regular commercial use of the golf course, as well as vehicle trips contributed by major golf tournaments hosted at the project location.

In Conclusion

Based on our present understanding of The Ridge at Trinitas proposal, our Center acknowledges that the current application has some advantages over a plan to simply subdivide the property. However, the possible direct and indirect environmental consequences of this high-profile proposal are unquestionably more complex and have greater repercussions for the surrounding area than a more straightforward parcel division. Therefore, we ask that the County carefully consider our comments as our staff attempts to work collaboratively with the applicant and the County.

Respectfully Submitted,



Thomas Hofstra, PhD
Staff Ecologist



Michael Milne, Staff Biologist