

LETTER 23 - RON AND LINDA DINNELL, NOVEMBER 15, 2005

NOV-15-05 12:20 FROM KINKOS REDONDO BEACH

ID: 3107926626

PAGE 1/5

Via Facsimile (209) 966-5147 - One-Page

November 15, 2005

To: ✓ Kris Schenk ✓
Janet Bibby
Dianne Fritz
Bob Rickard
Lee Stetson
Lyle Turpin

RECEIVED
NOV 14 2005
Mariposa County Planning Dept.

From: Ron and Linda Dinnel

Re: Cathays Valley Town Planning Area

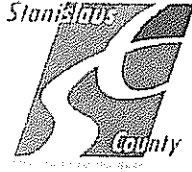
As per our presentation at the Supervisors Meeting on November 1, we would like to encourage you to add to the alternative section of the EIR:

Keep the Cathays Valley Town Planning Area as it is.

Thank you for your time.

COUNTY OF MARIPOSA GENERAL PLAN - VOLUME IV
ENVIRONMENTAL IMPACT REPORT

LETTER 24 - COUNTY OF STANISLAUS, DECEMBER 1, 2005



cc: *RWS*
Planning
CHIEF EXECUTIVE OFFICE
Richard W. Robinson
Chief Executive Officer

Patricia Hill Thomas
Chief Operations Officer/
Assistant Executive Officer

Monica Nino-Reid
Assistant Executive Officer

Stan Risen
Assistant Executive Officer

1919 10th Street, Suite 6800, Modesto, CA, 95354
P.O. Box 3104, Modesto, CA, 95320-3104
Phone: 209.525.6333 Fax: 209.544.6826

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

December 1, 2005

Mariposa County
Planning Dept.
P.O. Box 2039
Mariposa, CA 95338

SUBJECT: ENVIRONMENTAL REFERRALS- COUNTY OF MARIPOSA-
SEPTEMBER 2005 DRAFT EIR AND GENERAL PLAN

Planning Staff:

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and has no comments at this time.

The ERC appreciates the opportunity to comment on this project.

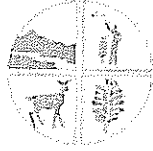
Sincerely,

A handwritten signature in black ink, appearing to read 'Raul Mendez', written over a horizontal line.

Raul Mendez, Senior Management Consultant
Environmental Review Committee

cc: ERC Members

LETTER 25 - CENTRAL SIERRA ENVIRONMENTAL RESOURCE CENTER,
DECEMBER 2, 2005



Central Sierra Environmental Resource Center
Box 596 • Tuolumne Hills, CA 95383 • (209) 506-7430 • FAX (209) 506-4096

RECEIVED

DEC 19 2005

Mariposa County Planning Dept.

December 2, 2005

Kris Schenk, Planning Director
Mariposa County Planning Department
Post Office Box 2039
5100 Bullion Street
Mariposa, CA 95338-2039

Re: General Plan Update 2005 Draft Version

Dear Mr. Schenk,

Our Center appreciates the opportunity to comment on the Mariposa Draft General Plan Update and the accompanying Draft EIR. Our Center has been an active participant in Tuolumne and Calaveras County land use and county planning issues for over a decade and was deeply involved in Tuolumne County's 1996 General Plan Update. While we have not been actively engaged in most Mariposa County land planning development issues, we recognize the influence that your county's decisions have on the Lake Don Pedro and Groveland-Buck Meadows areas—places where we are actively involved. We area also providing comments because wildlife knows no boundaries, so policies and land planning decisions in Mariposa County affect species that may also utilize lands in our area of influence. After careful review, our Center has identified numerous issues of concern in the draft General Plan update and its associated DEIR.

Baseline Environmental Information Needed

It appears that basic, baseline environmental information has not been gathered or displayed during the General Plan update process. The completion of biological and habitat inventories is a critical and indispensable first step that needs to be completed *before* any EIR can adequately evaluate the scope and degree of potential environmental impacts resulting from approval of a General Plan update. At a minimum, we ask that the County inventory and map all available information on wildlife habitat and sensitive species locations before any updated General Plan is approved. It is unclear how the draft EIR can meet CEQA's requirement for locally appropriate thresholds of significance if the County lacks the baseline studies that establish the current conditions. Biological inventories are also needed in order to ensure that cumulative impacts to biological resources are thoroughly analyzed and properly mitigated in the EIR.

In the absence of detailed data provided by baseline information, it is very doubtful that the public or County decision-makers can make informed decisions as to whether the proposed mitigation measures will protect Mariposa's valuable wildlife and plant resources.

Cumulative Impacts Analysis

The three-paragraph analysis of cumulative impacts presented in the EIR clearly does not meet the legal requirements of CEQA. This section lacks critical information and makes no attempt to specify or quantify the future foreseeable environmental impacts of the General Plan update. At a minimum, the cumulative impacts assessment should examine recent land use trends over the past decade, evaluate the implication of the General Plan update on these trends, and analyze the potential future environmental consequences in the context of past impacts. As an example, this section should ascertain how many acres of oak woodlands have been converted in the past decade, predict how many additional acres of oak woodland would be developed under the current General Plan update, and consider the environmental effects of this additional loss in light of current conditions. This line of questioning should be applied across the entire range of issues in the general plan—and particularly where impacts are deemed significant and unavoidable.

Moreover, because the General Plan update is a programmatic document that will establish numerous policies whose influence will extend 20 years into the future, an adequate review of the cumulative impacts must also consider an evaluation of the synergistic effects of these policies. In other words, the cumulative impacts section should determine how policies would interact and potentially exacerbate environmental issues during the entire 20 years covered by this update. For instance, what are the potential cumulative impacts for the air quality of the County given the large size of the proposed Community Centers and the General Plan update's target traffic service level of D? In 10 or 15 years, will traffic congestion lead to localized problem areas where local or state air quality standards will be frequently violated?

Cumulative Impacts to Biological Resources Are Not Addressed

Our Center is also concerned that the EIR does not contain proposed mitigation measures to address the cumulative impacts of the growth and development generated by the General Plan update. Since this document will guide Mariposa's development for the next several decades and allow for significant population growth, it is highly likely that there will be significant and unavoidable cumulative impacts to biological resources from habitat loss, road construction, and other activities—even if mitigation measures BR1 through BR8 are implemented. As defined by CEQA, cumulative impacts of a project can be significant even when the impacts of the individual projects do not meet the thresholds of significance or are mitigated to a less than significant level. While proposed measures BR1 through BR8 may address site-specific concerns on a project-by-project basis, they will not mitigate cumulative and landscape level effects on plant and wildlife species. Therefore, the EIR needs to create

additional mitigation in order to *specifically* address the potential for cumulative impacts to biological resources. Given the high growth rate of Mariposa County and the corresponding large amount of development and habitat conversion that is likely to occur before the next General Plan update, this is a serious omission that makes the update vulnerable to litigation.

Cumulative effects mitigation measures are also necessary because it appears that the draft General Plan lacks protection for habitat that is not directly linked to special status wildlife species, but which still provides essential services to wildlife—such as nesting/denning/roosting sites, key food resources, and wildlife movement corridors. The blue-oak woodland is a good example of a valuable habitat that is not adequately protected by mitigation measures designed to reduce impacts only where special status species occur.

In recognition of the impact to “non-target” habitats, counties like El Dorado and Tuolumne County have developed Open Space standards for all discretionary entitlements. The General Plans of these counties are relevant to Mariposa County because both have comparable biological communities. In Tuolumne County, 20% of the total acreage in *all* tentative parcel maps, zoning amendments, or general plan amendments must be designated as Open Space (unless the property does not contain suitable wildlife habitat like annual grassland). We are supportive of such an Open Space mitigation option and suggest that Mariposa follow the lead of neighboring counties and incorporate mitigation measures explicitly targeted to address cumulative impacts to biological resources. A mitigation measure similar to Tuolumne County’s Open Space policy—one that requires the protection of Open Space on all discretionary entitlements or a detailed site-specific plan developed in conjunction with DFC—would not only help ensure that cumulative impacts on habitat are addressed in the EIR, but would also help protect other environmental resources such as water quality.

Up-zoning of Agricultural and Mountain Preserve Lands

We are also very concerned by the proposal to allow roughly 38,000 acres of rural land to be up-zoned from 160 to 40 acres per parcel. Our experience in both Tuolumne and Calaveras County indicates that this would begin a significant transformation that would have serious repercussions. Reducing parcel sizes in rural areas simultaneously reduces the land’s agricultural value, promotes future conversion to rural ranchettes, results in the construction of new roads, and increases habitat fragmentation. The landscape level consequences as well as local environmental impacts of these activities should not be underestimated. Thus, if approved, we ask that this policy be directly addressed in the biological resources section EIR with an additional mitigation measure to correspond to correspond to the impacts of such broad conversion of currently large parcels.

This policy would also likely lead to a four-fold increase in the number of residences in many rugged, rural areas and a dramatic increase in the number of residences in extremely high fire risk areas. Allowing more residences among dense brush and forested areas with moderate or steep slopes would

substantially increase the fire risk and create an increased burden on existing fire suppression forces. Even if homes have appropriate clearances, a major wildfire threat still requires CDF or County fire personnel to divert suppression forces to structure protection rather than fire fighting and containment efforts. New lots in high fire risk areas without a major effects analysis of fire/fuels impacts, available protection, and an analysis of cumulative burdens would cause the County to fail to meet CEQA impact requirements. It is unclear if Mariposa County has adequate fire services to permit any increase in vulnerability, and it is unclear whether additional residential development in such distant, risky locations would create an excessive burden on fire services in the event of a large fire.

Community Planning Areas

Our Center is extremely troubled by the size and nature of the proposed Community Centers. The boundaries of these areas have been greatly expanded in the General Plan update and do not appear to be consistent with the rural nature of Mariposa County. The sizes of the Community Centers directly contradict the General Plan's stated objective to concentrate development by encouraging leapfrog development. It appears that the Community Centers could generate significant growth inducement through the provision of new services and infrastructure. The EIR fails to discuss the implications of such large Community Centers on the environment both inside and outside these designated areas. This is a serious omission that undermines the ability of the public and decision-makers to make fully informed decisions.

The land use designation used in the Community Planning Areas also contains so much flexibility that it is difficult to ascertain how these areas will be developed. This flexibility creates a great deal of uncertainty and makes a thorough analysis of the environmental impacts of expanding these areas very difficult. Thus, the specific locations and the amount of the proposed land uses needs to be further clarified if the County expects the environmental impacts of these areas to be effectively identified and mitigated. Considering the difficulty of assessing the impacts of the Community Center Plans and their potential to generate such negative environmental consequences for Mariposa County, we believe that the most sensible solution is to substantially reduce the size of these areas.

Traffic Impacts

The EIR cannot accurately predict and analyze the traffic impacts of the General Plan update without a more rigorous assessment and analysis tied to a comprehensive Traffic Study. Without this information, there is no guarantee that sufficient mitigation measures will be developed and no assurance that decision-makers will make informed decisions regarding vehicle traffic in Mariposa County. Thus, prior to any approval of the EIR or the General Plan update, we ask that the County supplement the current analysis with a Traffic Study so that appropriate local standards and mitigation measures can be developed and implemented in accordance with CEQA requirements.

More specifically, a target Level of Service D is an inappropriate standard for a rural county's General Plan. Without a doubt, the traffic delays and congestion associated with a D service level would create serious quality of life impacts for the County's residents. If the County cannot accommodate future development and provide at least a service level of "C" on its road network, it needs to scale back the potential for future growth accommodated by the General Plan update.

Mt. Bullion and Bear Valley

Finally, our Center is alarmed by the General Plan update's plan to allow the roughly 2,500-acre area between Mt. Bullion and Bear Valley to suburbanize into 5-acre parcels. This would be a dramatic conversion from the existing land use designation that permits 1 parcel per 160-acres. A change of this magnitude across such a large area deserves more fine scale analysis than is currently contained in the General Plan update's EIR. Since the County lacks even basic baseline environmental and biological data and has a surplus of already existing buildable lots based on growth projection for the next 20 years, we strongly urge that the update be revised and that the County retain this area in a natural resource land use designation without allowing the conversion of so much acreage to ranchette size parcels.

Conclusion

As described throughout these comments, our staff has major concerns regarding the EIR's specificity and has many issues with the adequacy of the current mitigation measures. Likewise, we question the appropriateness of some of the General Plan update's policies due to their numerous cumulative as well as significant and unavoidable impacts. In the absence of adequate biological data and an adequate cumulative impacts analysis, we believe that the proposed General Plan and EIR do not satisfy or fully comply with CEQA. Thus, we ask that the County eliminate serious omissions in the EIR's analysis as identified in our comments and scale down some of the expansive growth that would be allowed by the General Plan update.

Please add us to your database of interested parties to be notified of public hearings on the General Plan or related matters.

Thank you.



Michael Milne, Staff Biologist

LETTER 26 - COUNTY OF TUOLUMNE BOARD OF SUPERVISORS, DECEMBER
13, 2005

Tuolumne County
Administration Center
2 South Green Street
Sonora, California 95370

Phone (209) 533-5521
Fax (209) 533-6549



2005 DECEMBER
13
Alicia L. Jamar
Clerk of the Board
of Supervisors
Elizabeth Logan
Assistant Clerk

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DEC 13 2005
MARIPOSA COUNTY

BOARD OF SUPERVISORS
COUNTY OF TUOLUMNE

Liz Bass, *First District*
Mark V. Tharnton, *Fourth District*

Paolo Maffei, *Second District*

Vacant - *Third District*
Richard H. Pland, *Fifth District*

December 13, 2005

Mr. Kris Schenk, Director
Mariposa Planning
County of Mariposa
P. O. Box 2039
Mariposa, CA 954338-2039

Subject: Mariposa County General Plan Draft Environmental Impact Report

Dear Mr. Schenk:

Thank you for providing copies of the September, 2005 Mariposa County General Plan, Interim Land Use Maps, Technical Background Report and Draft Environmental Impact Report (DEIR) for our review. We appreciate your Board of Supervisor's extending the comment period on the DEIR until December 27, 2005 to allow us adequate time to review the documents and provide written comments.

In September, 2002, Tuolumne County provided written comments on the preliminary version of the County of Mariposa General Plan Update. Our comments today will focus on issues raised at that time. A copy of the earlier letter is enclosed as a reference.

In our earlier response, we commented that it was difficult to assess the cumulative impacts of the General Plan before Area Plans for the various communities within the County were completed. At this time, it appears that a strategy has been developed for completion of the Area Plans, as outlined in Table 5-1: *Planning Areas and Area Plan Status*. Per the table and discussions with your staff, we understand that a Town Plan for the Lake Don Pedro area and Community Plan for the Greeley Hill area may be developed within the next five years. We also understand that no schedule has been set for development of a Buck Meadows Special Area Plan. Until Area Plans are developed for all Mariposa communities, but in particular these communities closest to the common boundary between Mariposa County and Tuolumne County, it remains difficult for us to assess the impact that future planning and development decisions may have on Tuolumne County. We urge you to take the steps necessary to develop these Area Plans and we look forward to helping in any way that we can.


**COUNTY OF MARIPOSA GENERAL PLAN – VOLUME IV
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In the past, Tuolumne County's Community Development Department and Public Works Department have offered to work with staff in Mariposa County and the Lake Don Pedro community to develop a Specific Plan or Area Plan for the Lake Don Pedro Subdivision, which straddles the Mariposa and Tuolumne County line. A combined effort to develop an Area Plan for the Lake Don Pedro region of both counties would be consistent with the collaborative planning approach identified in your Land Use Element. Development pressures on the Tuolumne County portion of the Lake Don Pedro area have increased in recent years. Tuolumne County is currently processing four development applications in the Lake Don Pedro Area that, if approved and constructed, would create 92 ten- to twenty-acre parcels that may each be developed with up to two residential units, 75 five-acre parcels that may each be developed with one residential unit and 512 additional residential units within a planned community, a 250 room hotel, 500,000 square feet of commercial space and a 100,000 square foot entertainment complex with a theatre, restaurants and retail space. The development pressures that are being experienced by the Lake Don Pedro Area in both of our counties are significant and a comprehensive plan would be very helpful to identify and address some of the unique issues that this area faces. We look forward to working with your staff on a plan for this area.

Tuolumne County encourages the recommended mitigation measures concerning biological resources as contained in the Draft Environmental Impact Report be included in the Mariposa General Plan. As we have previously mentioned in our earlier comments, Tuolumne County has an adopted program to address the impacts of development on wildlife habitat and special status species. The program was controversial in its making in 1987, but it now speeds development projects through this portion of the review process, because our regulatory agencies (U.S. Fish and Wildlife Service and California Department of Fish and Game) were involved in the program's formulation and have continued to be informed and involved in the implementation of the program. We also believe developers appreciate the program, because they understand up-front what is expected to mitigate the cumulative impacts of their individual developments on wildlife habitat. The mitigation measures outlined in the Biological Resources portion of the Draft Environmental Impact Report, particularly BR-4 to create a Comprehensive Vegetation Community Map would assist Mariposa County in developing such a program, should that be desirable. Tuolumne County Community Development Department staff would be happy to provide copies of the Wildlife Handbook, or further explain its benefits, if your staff or Board of Supervisors is interested.

If you have any questions regarding the comments contained in this letter, please contact Community Development Director Bev Shane, or Senior Planner, Mary de Beauvieres at (209) 533-5633.

Respectfully,


Paolo Maffei
Chair

Enclosure

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COMMUNITY DEVELOPMENT
DEPARTMENT

BEV SHANE, AICP
Director

HOUSING SAFETY - CODE COMPLIANCE - FIRE PREVENTION - PLANNING - GIS

48 W. Yancy, Simara
Building 2 S. Green Street
Socoma, CA 95376
(209) 533-5633
(209) 533-5616 (fax)

September 12, 2002

Eric J. Toll, Director
Mariposa County Planning
P.O. Box 2039
Mariposa, CA 95338-2039

RE: County of Mariposa General Plan Update - Preliminary Plan

Dear Mr. Toll:

Thank you for this opportunity to comment on the preliminary version of the County of Mariposa General Plan Update. We note that Mariposa County has yet to complete the drafting of many proposed Area Plans for the defined communities identified in Figure 1-5 of Mariposa's preliminary General Plan. According to Section 3.4.01 B (2) of that Plan, only Coulterville, Fish Camp, Mariposa and Wawona have adopted Specific Plans and these will need some editing for consistency with the new General Plan. Table 3-1 identifies eleven (11) more areas as proposed to have new Area Plans and Section 4.4.01 states that the "General Plan is designed to incorporate 18 Area Plans for towns, communities and special areas". We would suggest that since there are so many areas that land use issues remain unsettled for future growth and development in Mariposa County, that you may wish to recirculate the County of Mariposa's General Plan for public comment after all of the different Area Plans are developed, in order to assess the cumulative benefits of mitigation chosen in the goals, policies and implementation measures for as yet unknown impacts from planned growth and development on the County as a whole. It is very difficult to review the benefits or the potential for cumulatively significant negative impacts on the environment of adjacent counties related to the proposed General Plan goals, policies and implementation measures, when the future land use issues for so many areas of the County remain unsettled.

Section 7.14 of the Plan states that the U.C. Merced new campus planned near Merced would include 20,000 students and that the "Environmental Impact Report for the Long Range Campus Development Plan purports no housing impacts will occur in Mariposa County" and the "County finds this assertion to be unrealistic". We concur with that assessment. The new U.C. campus would also add substantial staff and faculty to the campus area, with spin-off employment to serve the campus. The Lake Don Pedro Subdivision is within a half-hour easily commutable distance to Mariposa County and is likely to experience significant growth pressure from this new campus related employment.

The current population of Mariposa County is shown on Figure 1-2 to be just under 18,000 persons. However, Section 2.2.01 (J) of the Plan states that the "policies of the Plan reflect a capacity to support a maximum population of 50,000 people" and Table 2-1 predicts a population of 37,000 persons by 2020. Much of western Mariposa County is proposed on Figure 4.1 of this General Plan as an agricultural zone for the 20-year

COUNTY OF MARIPOSA GENERAL PLAN – VOLUME IV
ENVIRONMENTAL IMPACT REPORT

contracted Williamson Act/Land Conservation Act contracted lands. A large area of the central portion of the County is shown on Figure 4.1 of this General Plan as a natural, scenic and cultural resources zone. Figure 7.8 notes that the agricultural area is 258,594 acres and the natural, scenic, cultural resource area is 67,880 acres. Section 7.5.11 states that "federal agencies control over 474,000 acres or 51 percent of the County's land area". Section 7.4 of the Plan states that "less than 180,000 acres are available for single-family residential development". Section 2.2.01 (J) of the Plan states that "the 'Lakes' area of the County has the potential of accommodating significant new populations. There are more than 2,200 undeveloped sewer and unsewered lots in the Lake Don Pedro area on which single family residences can be constructed." At full build out, these existing lots at Lake Don Pedro would accommodate approximately 5,500 more persons. The Lake Don Pedro Subdivision is one of the many areas without formulated Area Plans with land use maps. Therefore, it cannot be determined where the remainder of the predicted 19,000 to 32,000 person expansion above the existing 18,000 person population will be located, or what impacts on surrounding counties would occur from the policies and implementation measures of this General Plan, which currently proposes to double or triple the existing population of Mariposa County.

Section 7.5.03 of the Plan states that the "County does not implement the 'Quimby Act' and requires no parkland dedication or fee". Although State Government Code, Section 66477, the Quimby Act, is permissive in stating that a County *may* require parkland dedications or fees for subdivision or parcel maps, it does not require such dedications or fees. However, the Quimby Act states that three (3) acres of parklands should be set aside for each 1,000 persons. We note that at a meeting on the General Plan update on September 5, 2002, the residents of the Lake Don Pedro Subdivision requested the set aside of parklands in their community and that the need does exist for neighborhood parks in Mariposa County. If parks are not provided in Mariposa County in the Lake Don Pedro neighborhood, this will put undue pressure on Tuolumne County's portion of that neighborhood for additional parklands. Section 11.2.01 of the Plan acknowledges that ballparks are already over crowded in the County and budgets are stretched to the limits. Maintaining the existing service level as proposed in proposed Policy 11.2 appears to be inadequate. Section 11.5.01 of the Plan notes that "Mariposa County has no permanent dedicated funding sources for recreation". Plan Policy 11.5-1a proposes to "create an ongoing system for financing of park and recreation improvements".

Section 7.5.07 of the Plan states "Mariposa County has no impact fees of any kind at this time". The reader wonders how off site infrastructure costs resulting from developments, such as parks, are funded or how cumulative impacts from future growth and development to the County's infrastructure and services will be funded or mitigated.

The proposed Mariposa General Plan prescribes a system of future project by project reviews, impact analysis and mitigation. Such a methodology fails to provide the current reader any understanding of long-term cumulative environmental impacts regarding land use designations, future development or infrastructure necessary to support land development. This piecemeal approach to transportation planning, for example, leaves Tuolumne County unable to assess the long range impacts of land use plans along our southern borderline shared with Mariposa County's northern and eastern boundary. Tuolumne County has concerns with impacts to Tuolumne County roads, according to our Public Works Department, and concerns about associated cumulative impacts to air quality in our shared Mountain Counties Air Basin, according to our Air Pollution Control District. Section 7.2.02 A states that "26 percent of Mariposa County residents who are

COUNTY OF MARIPOSA GENERAL PLAN –VOLUME IV
ENVIRONMENTAL IMPACT REPORT

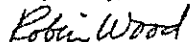
employed worked outside the County in 2001". This indicates a large number of residents are currently utilizing roadways in neighboring counties. The access for Buck Meadows and Foresta is provided through Tuolumne County roads. The access for Lake Don Pedro Subdivision overlaps into Tuolumne County, which provides roadway access for a commercial district serving that subdivision. Please refer to the attached letter from the Tuolumne County Public Works Department for additional comments on transportation related issues.

Tuolumne County's Community Development Department and Public Works Department have offered to work with their counterparts in Mariposa County and the community to develop a Specific Plan or Area Plan for the Lake Don Pedro Subdivision, which overlaps both counties. Such a plan should address the need for added school facilities in the Lake Don Pedro Subdivision. Although Mariposa planning staff stated at a meeting on the General Plan update on September 5, 2002, in response to inquiry from the residents of the Lake Don Pedro Subdivision, that the schools issue was only the jurisdiction of the County schools office, the siting of schools must be consistent with the General Plan. The General Plan land use maps must identify adequate areas for new public facilities needed for future growth, including schools. Students from Mariposa County currently secure inter-district transfers to attend high school at the Lake Don Pedro subdivision in Tuolumne County.

105 special status plants and 137 special status animals are listed as occurring in Mariposa County by Tables 10.1-2 and 10.1-3 of the Technical Background Report. This number of special status species is comparable to the number of special status species listed by the Natural Diversity Database, Division of the State Department of Fish and Game for Tuolumne County, which currently has 88 special status plant species and 115 species of animals. Section 10.3.03 B proposes only to mitigate for the habitats of these special status species in Implementation Measure 10.3-1a(1) to "provide for protection of the resource value of these areas". This language seems more like policy language than true implementation language, which usually tells how some policy will be accomplished. Tuolumne County has found that a comprehensive guide for conservation of special species habitat (the Tuolumne County Wildlife Handbook) has been effective in addressing cumulative impacts to wildlife habitat since 1987. This Wildlife Handbook addresses the cumulative impacts from growth and development on the habitats of special status species. Special status species issues can delay a project for many months when the mitigation program has not been worked out with the regulatory agencies in advance of the project application. This Wildlife Handbook was approved by the State Department of Fish and Game and the U.S. Fish and Wildlife Service in 1987 and is currently undergoing an update program.

If you have any questions regarding these comments, please contact Community Development Director Bev Shane, or me, at (209) 533-5633.

Respectfully,



Robin Wood, AICP,
Senior Planner

attachments

COUNTY OF MARIPOSA GENERAL PLAN – VOLUME IV
ENVIRONMENTAL IMPACT REPORT

Cc: Mark Thomson, Supervisor District 4
Bev Shane, Community Development Director
Peter Rei, Public Works Director



County of Tuolumne
Department of Public Works

Peter Rei, B.C.E., P.L.S.
Director of Public Works

A. N. Franussen Building
48 West Yaney Avenue
Mailing 2 South Green Street
Sonora, California 95370

Engineering and Road Operations Divisions
(209) 533-5601
Transportation Division
(209) 533-5603
County Surveyor Division
(209) 533-5626
Solid Waste Division
(209) 533-5588
Fax (209) 533-5698

DATE: September 6, 2002
TO: Robin Wood, Senior Planner
FROM: Adam Emmer, Transportation Planner
SUBJECT: Mariposa General Plan Revision

RECEIVED

SEP 06 2002

COUNTY OF TUOLUMNE
COMMUNITY DEVELOPMENT
DEPARTMENT

The Department of Public Works, Transportation Division has reviewed the revised Mariposa County General Plan. The following are our comments:

- Smith Station Road is identified as a major collector in the Mariposa General Plan. This designation is consistent with the Tuolumne County RTP. However, Priest-Coullerville Road, which is listed as a minor collector in the Tuolumne County RTP, is not identified in the Mariposa General Plan. This road and other minor collectors should be identified in the document.
- Although the University of California, Merced campus will be located in Merced County, the Mariposa County General Plan Circulation, Infrastructure and Services chapter should consider increased transportation impacts associated with this project and the potential for the Lake Don Pedro area to become a bedroom community. Long term traffic projections and proposed circulation improvements should include the regional effects of a major regional attraction such as UC Merced.

We are concerned that outlying areas including Lake Don Pedro may see significant growth induced by the development and operation of U.C. Merced. Roadways serving the Lake Don Pedro area may not be constructed to standards adequate to maintain safety and levels of service. Additionally, there are no transit services provided to the Lake Don Pedro area or interregional transit serving this location at this time. Therefore, the Mariposa General Plan needs to consider the possibility of Lake Don Pedro becoming a bedroom community to Merced and Modesto in addition to linkages to the campus from the east.

- The Mariposa General Plan prescribes a system of future project by project reviews, impact analysis and mitigation. Such a methodology fails to provide the current reader any understanding of long term cumulative environmental impacts regarding land use designations, future development or infrastructure necessary to support land development. This General Plan piecemeal approach to transportation planning leaves Tuolumne County unable to assess the long range impacts of land use plans along our south borderline and impacts to Tuolumne County roads.

Tuolumne County has adopted the following Implementation Programs as part of its

**COUNTY OF MARIPOSA GENERAL PLAN – VOLUME IV
ENVIRONMENTAL IMPACT REPORT**

General Plan. We encourage Mariposa County to adopt a similar policy in its General Plan Circulation Element:

- Cooperate With Other Jurisdictions on Funding and Establishing Road Standards
- Work with neighboring jurisdictions to provide acceptable and compatible levels of service and joint funding on the roadways that cross the County's boundaries.
- Section 8.1.3 identifies transit services available in Mariposa County. It is interesting to note that in addition to regional transit operations provided by VIA and Yosemite Area Regional Transit System (YARTS), tour buses and door-to-door demand response service, the Mariposa County Unified School District provides transit service to county residents. Section 8.1.3.3 indicates that school district buses serve students but does not mention serving the general public. If these buses are also providing service to the general public, the corresponding sections should be modified appropriately.
- Mariposa Transit also provides service to the Tuolumne Adult Day Health Care (ADHC) facility located in Groveland. Transit costs for eligible seniors are paid for by the Area Agency on Aging. Costs for eligible non-seniors are paid for by ADHC. This service and relative funding information should be included in the demand response transit section of the General Plan.
- Section 8.1.3.5 indicates that there is no existing countywide pedestrian and bicycle system. However, limited bicycle paths within the county do exist. The bicycle paths should be classified pursuant to the California Department of Transportation Highway Manual and their locations identified in the General Plan.
- Section 4.3 addresses potential traffic and transportation impacts associated with implementation of the Draft General Plan. The point of significance regarding evaluation criteria for a project is a decline in Level of Service (LOS) to LOS E or worse on state highways, county roads and intersections within Mariposa County. According to the Mariposa County Regional Transportation Plan (RTP), only State Highway 140, through the town of Mariposa had LOS D. Other state highways had LOS B or C. A point of significance for adverse conditions being set at LOS E allows aggregate levels of impacts to incur on state and county roads before triggering a finding of significance.

It should be noted Tuolumne County roadway Level of Service standards are as follows:

- LOS B on minor collector and local roadways, except within one-half mile of major collector or arterial highways where the standard shall be LOS C. The minimum peak hour LOS standard for intersections of minor collector and local roads with major collector and arterial highways shall be LOS C.
- LOS C on arterial and major collector roadways, except within one-half mile of similarly classed highways where the standard shall be LOS D. The minimum peak hour LOS standard for intersection of major collector roads and arterial highways shall be LOS D.

If you have any questions regarding these comments, please do not hesitate to contact me at 533-5601

COUNTY OF MARIPOSA GENERAL PLAN - VOLUME IV
ENVIRONMENTAL IMPACT REPORT



County of Tuolumne

Air Pollution Control District

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September 9, 2002

Robin Wood, AICP, Senior Planner
Office of Environmental Coordinator
County of Tuolumne
2 South Green Street, Sonora 95370

RE: Mariposa General Plan Revision - Draft Environmental Impact Report

Dear Ms. Wood:

Thank you for the opportunity to comment on the revision of the Mariposa General Plan. The Tuolumne County Air Pollution Control District (TCAPCD) has reviewed the Air Quality Element and has no specific comments at this time.

The TCAPCD works closely with the Mariposa County Air Pollution Control District as well as the other air districts in the Mountain Counties Air Basin (MCAB) in implementing control measures and strategies consistent with the State and Federal Clean Air Acts. We will continue to work together with the goal to improve air quality and protect public health.

If you have any questions or need additional information, please call me at 533-5693.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Sandman".

Bill Sandman
Deputy Air Pollution Control Officer

