



COMMUNITY DEVELOPMENT SERVICES

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July 17, 2018

El Dorado Irrigation District
Attn. Dan Corcoran, Environmental and Water Resources Manager
2890 Mosquito Road
Placerville, CA 95667

RE: El Dorado County Comments on the Upper Main Ditch Piping Project Draft Environmental Impact Report

Dan Corcoran:

The El Dorado County Community Development Services is providing the following comments in response to the release of the Draft Environmental Impact Report (EIR) for the Upper Main Ditch Piping Project.

1. The Blair Road Alternative and Combined Alternative descriptions on Page ES.4 and ES.5 do not include the diameter of the pipe. Is it the same as the Proposed Project at 42 inches?
2. Page vi, Abbreviations: The table of abbreviations may have a typographical error: What is the official abbreviation for the Upper Main Ditch Piping Project? Is it "Project" or "Proposed Project"?
3. Page ES-7, Section ES.1.2: El Dorado County permits would be required for the Blair Road Alternative and Combined Alternative. Specifically, encroachment permits for work in County roadways.
4. Page ES-7, Section ES.1.3 – Areas of Controversy / Issues to be resolved: The Potential diversion of surface waters is an area of controversy and an issue to be resolved.
5. Appendix B.2 is presented out of order in the pdf document found online.
6. Appendix B.2, Upper Main Ditch BODR Update: the second paragraph on page 12 makes reference to "Table 7". Table 7 is not found in the Update.
7. The County disagrees with the "No Impact" determination made in the initial study section IX.i and section IX.j (Appendix A). The County believes that the Proposed Project and the Blair Road Alternative would reduce the capacity of the ditch to convey surface runoff at historic levels. Runoff events larger than the 10-year design event would have the potential to trigger these potential impacts. The effects of these changes should be analyzed to a greater detail in the EIR.
8. The County disagrees with the findings for Impacts HYD-3 and HYD-4. Preparation and implementation of a Stormwater Pollution Prevention Plan is sufficient for management of construction and operations impacts to water quality, erosion and sediment control. However, the proposed changes to the conveyance capacity of the ditch cannot be managed by the proposed mitigation measure. The County believes a much more robust approach is necessary to fully mitigate these impacts, for the

Proposed Project and the Blair Road Alternative. With the Blair Road Alternative, portions of the main ditch would be abandoned by EID, and ownership of the ditch (and intercepted stormwater runoff) would revert to the landowners. The County sees this as problematic. Capacity of the ditch to convey historic runoff volumes would be impacted by any private activities, and the absence of EID maintenance activities. EID should provide greater details of how the ditch property will be disposed of or "relinquished" to ensure that property owners understand that the ditch conveys stormwater runoff and that they are responsible to maintain the facility so that it is adequate to convey this runoff after relinquishment.

9. No supporting hydrologic analysis of stormwater runoff from uphill properties, intercepted by the UMD was found in the documentation.

10. No supporting analysis was made as to the potential impacts of the release of runoff waters from the ditch in excess of the 10-year event (for the Project Alternative). Certainly these releases will affect downstream properties. The EIR is inadequate in this regard.

11. The EIR lacks a discussion of the disposition of inflows to the Treatment Plant that exceed Plant capacity to accept. Where are flows currently discharged? How will the Project or Blair Road Alternative affect this discharge?

12. No analysis is presented as to the potential impacts that may occur if flows exceed the capacity of the Proposed Project ditch and roadway in the event that overtopping occurs at locations other than the proposed weirs.

13. Will the maintenance road (and possibly the pipeline itself) be damaged by events exceeding the 10-year event?

14. How will downstream properties be impacted by large storm events that overtop the maintenance road (and proposed downstream berm)?

15. It is unclear whether the removal of oak trees will be required to comply with the County Oak Resources Management plan in-lieu fee program. Please clarify. The NOP for the Project was dated June 17, 2015 while the County Oak Resources Management Plan was adopted by the County Board of Supervisors on October 24, 2017. MM BIO-6 states the only mitigation is to: "Avoid and Minimize Impacts to Oak Trees and Oak Woodlands." County recommends EID commit to compliance with the County adopted in-lieu fee program as a mitigation measure for the removal of oak trees.

16. County disagrees with the LTS/M conclusion regarding Impact PUB-1. Similar to previous County comments regarding the "abandonment" of the existing ditch, the Project, without additional mitigation, results in a significant hardship to El Dorado County to respond to complaints and damage from drainage issues associated with the abandoned ditch. El Dorado County has already had similar experiences with EID's earlier abandonment of other ditch segments. Additional mitigation should be included to either maintain the functional drainage aspects of the ditch or to relocate, reconstruct, or reconvey runoff appropriately and with County coordination.

17. Is there a reason there was no State Clearinghouse number associated with the DEIR?

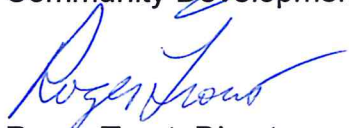
18. Mitigation Measure TRA-1 requires the preparation and implementation of a Traffic Control Plan during construction on roads. There should be more discussion of

what may be included within the Traffic Control Plan, such as performance measures, in order to avoid appearances of deferring mitigation. Use of alternate routes, the potential need for additional vegetation removal, creation of bypass road segments, potential road closures, temporary driveway accesses, etc., should be described as potential measures or should be prohibited. The potential environmental consequences of the mitigation measure needs to be considered.

Sincerely,



Rafael Martinez, Director
Community Development Services, Department of Transportation



Roger Trout, Director
Community Development Services, Planning and Building Department