



**CITY OF GRASS VALLEY  
ENGINEERING DIVISION**

125 East Main Street  
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**MEMORANDUM**

**Date: January 15, 2009**  
**To: Tom Last, Planning Director**  
**From: Trisha Tillotson, Senior Civil Engineer**  
**Subject: Idaho-Maryland Mine Draft EIR - Comments**

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- A. After reviewing the Draft EIR – Hydrology and Water Quality section for the Idaho-Maryland Mine, the Public Works Department of the City of Grass Valley requests clarification of the following:
1. How will the increased flows into the creek be addressed when the creeks are flooded? Will pumping of groundwater cease during flood events? Currently there does not appear to be sufficient storage planned to handle flows on the surface when creeks are near flooding stages at both the Idaho-Maryland Mine site and the New Brunswick site. It does not appear that a detailed analysis has occurred of the proposed water treatment facility at the New Brunswick site to remove particulates to State requirements or that a plant will work at that site, therefore, we are not able to comment on the design. From the Newmont owned mine currently discharging into the City's wastewater treatment plant, the winter flows appear to be approximately 4 times that of the average flows from their mine. What is the magnitude of the high flows versus the average flows for the Idaho-Maryland mine? Has this been considered in the proposed design of the water treatment plants and ponds?
  2. The referenced runoff modeling from Cranmer Engineering, Inc., dated 1996 was never approved by the City of Grass Valley nor was it accepted by FEMA. Why wasn't a HEC-RAS model prepared and the detailed study on file with FEMA used to determine if the increased flows would be significant or not? This report should be updated/redone to meet current City, State, and Federal requirements. Ultimately, the City, state, and FEMA will need to approve the drainage report.
  3. Wolf Creek and the South Fork of Wolf Creek both contain 100-year flood plains in City limits with base flood elevations determined. What will the new base flood elevations be with the additional flow?
  4. Mitigation Measure 4.7-5 states that discharges will cease upon the water surface elevation reaching 75% capacity at four different culverts. How will this be implemented? Who will be responsible for damage if the mine does not cease discharges? Was an analysis done for the impact of the mine flows at 75% capacity on downstream existing facilities?
- B. After reviewing the Draft EIR – Recreation section for the Idaho-Maryland Mine, the Public Works Department of the City of Grass Valley requests clarification of the following:
1. The 2000 Park & Recreation Master Plan recommended that the City locate a neighborhood park in this area of the City to meet future demand for Parks and Recreation Services. Given that this project does not include a housing element, there would be no need for a park while the mining operation is active. However, upon reclamation, why shouldn't the City receive an irrevocable offer of dedication of at least 2 acres of land suitable for a public park?



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2. The 2000 Park & Recreation Master Plan recommended a trail alignment along Wolf Creek to allow for the development of the Wolf Creek Parkway. Impact 4.12-2 discusses the potential for the Wolf Creek Parkway to be constructed, however, if an easement is not in existence then the future trail may never really occur. It is recommended that the IMM dedicate a 20' trail easement on the north side of the creek to allow for the future development of the trail.
- C. After reviewing the Draft EIR – Transportation and Traffic section for the Idaho-Maryland Mine, the Public Works Department of the City of Grass Valley requests clarification of the following:
1. On page 4.13-41 under Parking Demand, Mitigation Measure 4.13-10 which simply refers to Mitigation Measure 4.15-2 states that the mine will provide bicycle parking. How will this help reduce parking demand when bicycle lanes do not exist to get bicyclists to the site? Shouldn't the project provide bicycle lanes on City streets to the project site, specifically, Centennial Drive, Idaho-Maryland Road, and Bennett Street in order to be able to claim bicycle parking as one of the solutions for the parking demand?
  2. On the top of page 4.13-3 continued from the previous page, why is it specified that Dorsey Drive only has improvements "on its southern side" when the street is described as being in an east-west direction. I believe it should be clarified that the section of Dorsey Drive east of SR 49 is improved versus the section west of the highway which is mostly not improved with curb, gutter, and sidewalk.
  3. On page 4.13-3 under Pedestrians and Bicycle Traffic, bicycle lanes on East Main Street from Hughes Road to Scandling Avenue, on Hughes Road from Cypress Hills to Ridge Road, and on Sierra College Drive from Litton Drive to Ridge Road are not identified.
  4. The first paragraph on page 4.13-3 under Existing Traffic Conditions should be modified since intersection controls do not necessarily control the capacity of all City streets.
  5. On page 4.13-4 under Signalized Intersections and page 4.13-7 the City of Grass Valley's Traffic Study Methodology and Evaluation Criteria for Critical Intersections requires that signalized intersections be analyzed using the ICU 2000 methodology. Confirmation that this methodology does not provide worse levels of service than the methodology used should be provided.
  6. On page 4.13-10 under Regulatory Context, why is the City of Grass Valley not listed as a local jurisdiction and the City traffic policy not described? The majority of the impacted roads are local roads of which the City has jurisdiction and its own rules and regulations.
  7. On page 4.13-15 under Planned Roadway Improvements and page 4.13-16 under Proposed Project (Phases I, II, and III), the City does not have an implemented plan in place to construct the Centennial extension by 2015. The developer will be responsible for constructing the extension. The Centennial extension and Centennial/Idaho-Maryland Road are proposed as part of the Idaho-Maryland Mine project. In addition, a two-way stop controlled intersection in the interim will most likely not be sufficient due to sight distance issues. Most likely, a traffic signal will be necessary at the proposed new intersection. In addition, note 4 is not correct. The first part of the sentence in Note 4 does not make sense and the second part is not necessarily true. Also, some improvements may be planned by NCTC in their RTMF.
  8. On page 4.13-16 under Proposed Project (Phases I, II, and III) the assumption is that construction and operation of the project would begin in 2008. Since it is now 2009, this may need to be revised.



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9. On page 4.13-18 and 19, please provide additional information on how it can be assumed that construction traffic will not have a greater effect on the AM and PM peak hours.
10. On page 4.13-20 under Short Range Cumulative – Project Impacts, the development will be responsible for extending Centennial Drive to Bennett Street and realigning Centennial Drive to Springhill Drive at Idaho-Maryland Road.
11. On page 4.13-21, Table 4.13-10, please provide discussion as to why intersections 2 and 3 and intersections 9 and 10 were analyzed as separate intersections although their proximity causes them to function as one.
12. On page 4.13-21, Table 4.13-10, please provide discussion as to why intersections 13, 14, 15, 16, and 17 were analyzed as separate intersections although their proximity and geometry cause them to effect each other.
13. Starting on page 4.13-22, Note 6 refers to the City CIP Program. This reference is incorrect and should refer to the Grass Valley Transportation Impact Fee Program Nexus Study dated August 2008 (specifically, Appendix A: Roadway Capital Improvement Program). Please revise this reference throughout the document. For this particular reference, the intersection is not fully funded and in fact is part of the RTMF not the GVTIF.
14. On page 4.13-22 and 4.13-28, Mitigation Measures 4.13-1a and 4.13-4a for the Idaho-Maryland Road/SR 49 NB ramps intersection should be revised to state that the developer will fully fund all costs associated with the installation of the improvements. The improvement project may then be eligible for reimbursement through impact fees, assessment districts, community facility districts, or some other mutually agreed upon mechanism. Installing a signal at Idaho-Maryland Road and SR 49 NB ramps will also require the adjacent Idaho-Maryland/Railroad Avenue intersection to be signalized due to the two intersections close proximity (identified on page 4.13-30 as mitigation measure 4.13-4f). Also, it is incorrect to state that the applicant could pay their fair share of improvements to the City and that the project is a "priority project" in the GVTIF. Note 9 on page 4.13-28 is incorrect as the project is not funded through the GVTIF but is included in the RTMF.

Staff suggests revising **Mitigation Measure 4.13-1a** and **4.13-4a** as follows:

The applicant shall fund all costs associated with the installation of a traffic signal or other intersection improvements proven to mitigate the impact(s) at the unsignalized Idaho-Maryland Road/SR 49 NB ramps intersection prior to the issuance of any grading or building permits. Improvements may include traffic signals and equipment with optimized signal phasing and timing (i.e., allocation of green time for each intersection approach) and coordination with signal phasing and timing of adjacent signalized intersections. Other improvements such as the addition of an additional left turn lane on the off-ramp and/or improvement to the adjacent Idaho-Maryland Road/Railroad Avenue intersection may be needed upon further evaluation. Any improvement at this location shall meet Caltrans design standards and be subject to the review and approval of Caltrans and the City. This improvement may be eligible for reimbursement through NCTC's RTMF program."

15. On page 4.13-23 and 4.13-29, Mitigation Measures 4.13-1b and 4.13-4b for the Idaho-Maryland Road/Spring Hill Drive intersection should be revised to state that the developer will fully fund all costs associated with the installation of the improvements by the City. The improvement project may then be eligible for reimbursement through impact fees, assessment districts, community facility districts, or some other mutually agreed upon mechanism. This improvement, realignment of Centennial with Springhill and signalization, will be necessary at the onset of the project in



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order for large trucks to be able to safely enter onto Idaho-Maryland Road. In addition, the mitigation measure should not require the improvements only prior to Phase III building permits when it is the Phase II short range timeframe that is causing the impacts and the need for the improvements.

Staff suggests revising **Mitigation Measure 4.13-1b** and **4.13-4b** as follows:

The applicant shall fund all costs associated with the installation of a traffic signal or other intersection improvements proven to mitigate the impact(s) at the unsignalized Idaho-Maryland Road/Springhill Drive intersection prior to the issuance of any grading or building permits. Improvements may include traffic signals and equipment with optimized signal phasing and timing (i.e., allocation of green time for each intersection approach) and coordination with signal phasing and timing of adjacent signalized intersections. Any improvement at this location shall meet City design standards and be subject to the review and approval of the City. A portion of the improvements may be eligible for reimbursement through the City's GVTIF program."

16. On page 4.13-27, Table 4.13-14, provide discussion as to why the LOS's shown may not be exactly the same as those shown in the City's traffic model for intersections 6, 7, and 10-17. In addition, intersection #14 for the Colfax Avenue/SR 49 SB Frontage Road is not discussed although the LOS is in bold print in the table which elsewhere indicates that the threshold is exceeded. Is mitigation at this intersection required? If not, discussion is needed as to if the threshold of significance is exceeded or not.
17. On page 4.13-29, Mitigation Measure 4.13-4c for Bennett Street/SR 49 SB off ramp intersection should be revised to state that the developer will fully fund all costs associated with the installation of the improvements. The improvement project may then be eligible for reimbursement through impact fees, assessment districts, community facility districts, or some other mutually agreed upon mechanism. Installing a signal at the Bennett Street/SR 49 SB off ramp intersection may also require the adjacent Bennett Street/SR 49 SB off ramp intersection to be signalized due to the two intersections close proximity. The mitigation measure should be reworded to state that improvements, such as a signal, may be needed.

Staff suggests revising **Mitigation Measure 4.13-4c** as follows:

The applicant shall post funds for the currently unfunded portion (per the GVTIF) of all costs associated with the installation of a traffic signal or other intersection improvements proven to mitigate the impact(s) at the unsignalized Bennett Street / SR 49 SB ramps intersection prior to the issuance of any building permits for Phase III. Improvements may include traffic signals and equipment with optimized signal phasing and timing (i.e., allocation of green time for each intersection approach), coordination with signal phasing and timing of adjacent signalized intersections, and the installation of a left-turn lane, through lane, and right turn lane for the southbound approach. Other improvements such as at the Bennett Street / SR 49 NB on ramp intersection may be needed upon further evaluation. Any improvement at this location shall meet Caltrans design standards and be subject to the review and approval of Caltrans and the City. If funds for the unfunded portion of the improvements are posted, those funds may be eligible for reimbursement through the City's GVTIF program. In the event full funding for the intersection is acquired from other sources, the applicant's payment of their GVTIF will mitigate their impacts to this intersection."

18. On page 4.13-30, under Colfax Avenue/SR 49 NB Frontage Road the proposed improvements may not be feasible due to right of way constraints. Reword Mitigation measure 4.13-4d to state that if the proposed improvements cannot be constructed, than the applicant will be required to provide an analysis for other improvements to the intersection. In addition, this intersection is in Caltrans right of way and will require their approval as well as the City's.



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Staff suggests revising **Mitigation Measure 4.13-4d** as follows:

The applicant shall fund all costs associated with the installation of a traffic signal or other intersection improvements proven to mitigate the impact(s) at the unsignalized Colfax Avenue / SR 49 Frontage Road intersection prior to the issuance of any building permits for Phase III. Improvements may include traffic signals and equipment with optimized signal phasing and timing (i.e., allocation of green time for each intersection approach), coordination with signal phasing and timing of adjacent signalized intersections (such as the Neal Street triangle intersections), installation of a left turn and through lane for the eastbound approach, installation of a through lane, and right turn lane for the westbound approach, and restriping of the northbound approach to include a shared left and through lane and an exclusive right turn lane. Other improvements at other adjacent and/or close by intersections may be needed upon further evaluation. Any improvement at this location shall meet Caltrans design standards and be subject to the review and approval of Caltrans and the City. In lieu of installing the improvements the applicant may, at the City's discretion, enter into a long-term funding agreement to ensure the improvements will be installed.

19. On page 4.13-31, Mitigation Measure 4.13-4e for the South Auburn Street/SR 49 NB off ramp intersection should be revised to state that the developer will fully fund all costs associated with the installation of the improvements by the City. The improvement project may then be eligible for reimbursement through impact fees, assessment districts, community facility districts, or some other mutually agreed upon mechanism. The applicant may need to look at doing improvements to all of the adjacent signals as well. The NCTC and the City has previously looked at this area and determined that substantial improvement to the entire area is needed, such as, a roundabout at S. Auburn and Neal Street, adjusting the alignment of the S. auburn/SR 49 off-ramp with the frontage road, etc.

Staff suggests revising **Mitigation Measure 4.13-4e** as follows:

The applicant shall post funds for the currently unfunded portion (per the GVTIF) of all costs associated with the installation of a traffic signal or other intersection improvements proven to mitigate the impact(s) at the unsignalized South Auburn Street / SR 49 NB off ramp intersection prior to the issuance of any building permits for Phase III. Improvements may include traffic signals and equipment with optimized signal phasing and timing (i.e., allocation of green time for each intersection approach), coordination with signal phasing and timing of adjacent signalized intersections, and the installation of a through lane and a right turn lane for the northbound approach. Other improvements at other adjacent and/or close by intersections may be needed upon further evaluation. Any improvement at this location shall meet Caltrans design standards and be subject to the review and approval of Caltrans and the City. If funds for the unfunded portion of the improvements are posted, those funds may be eligible for reimbursement through the City's GVTIF program. In the event full funding for the intersection is acquired from other sources, the applicant's payment of their GVTIF will mitigate their impacts to this intersection."

20. On page 4.13-31, Mitigation Measure 4.13-4f for the Idaho-Maryland/Railroad Avenue intersection should be revised to state that the developer will fully fund all costs associated with the installation of the improvements by the City. The improvement project may then be eligible for reimbursement through impact fees, assessment districts, community facility districts, or some other mutually agreed upon mechanism. The proposed improvement does not seem plausible without major modifications to the adjacent intersection. In addition, the improvement will have to include installation of a signal since it is adjacent to the Idaho-Maryland Road/SR 49 NB ramps intersection which is to be signalized. Note 14 is not correct and must be revised to reflect the fact that the GVTIF does not have this intersection listed. The RTMF does list this intersection but not the improvements described below.

Staff suggests revising **Mitigation Measure 4.13-4f** as follows:



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The applicant shall fund all costs associated with the installation of a left turn pocket and two through lanes on the westbound approach or other intersection improvements proven to mitigate the impact(s) at the Idaho Maryland Road / Railroad Avenue intersection prior to the issuance of any building permits for Phase III. Other improvements at the Idaho-Maryland Road / SR 49 northbound ramps may also be needed upon further evaluation. Any improvement at this location shall meet Caltrans design standards and be subject to the review and approval of Caltrans and the City. In lieu of installing the improvements the applicant may, at the City's discretion, enter into a long-term funding agreement to ensure the improvements will be installed.

21. On page 4.13-35 under Site Access and Circulation Impacts, the signal installation at Idaho-Maryland Road and Centennial/Springhill should be identified as necessary at the onset of the project. The reference to Mitigation Measure 4.13-1b does not reduce the impact level as worded. The statement that "sight distance along Idaho-Maryland Road would be adequate" is not true with the realignment of Centennial. When one improves and intersection, all legs must be considered. In this case the Springhill leg will not have adequate sight distance.
  22. On page 4.13-37, under Truck Access and Circulation, how will truck access onto the highway (as described in the second paragraph) be enforced?
  23. On page 4.13-38 under Construction Period Impacts, the anticipated construction activity dates should be revised.
  24. On page 4.13-39, Mitigation Measure 4.13-9 should be revised to state that the Traffic Management Plan will be accepted (not approved) by the City and County (not and/or County). It is suggested that the reference to an off-site parking program be deleted since this is not evaluated in the draft EIR.
  25. On page 4.13-41 under Parking Demand, the document states that facilities will be provided to encourage bicycle commuting. Previously stated in the document, was the lack of bicycle lanes on City streets. The project should provide bicycle lanes on City streets, specifically, Centennial Drive, Idaho-Maryland Road, and Bennett Street in order to encourage bicycle commuting. Mitigation measure 4.13-11a should include the addition of bicycle lanes.
  26. On page 4.13-43, Mitigation Measure 4.13-11a should also include sampling and testing on Centennial Drive, the highway frontage roads, and any intersection that truck traffic will be regularly crossing. Any improvements should be per Caltrans and/or City standards (not "Caltrans Design Manual" which is not a correct reference). The Mitigation Measure should be modified to indicate that locations, sampling, testing, results, roadway classifications, and all associated calculations shall be approved by the City Engineer.
  27. On page 4.13-43, Mitigation Measure 4.13-11b should be revised to indicate that the proportionate share of haul road maintenance shall be as approved by the City of Grass Valley.
  28. On page 4.13-44, the GVTIF should refer to the final August 2008 version (not the April 2008 version).
- D. After reviewing the Draft EIR – Utilities and Services Systems section for the Idaho-Maryland Mine, the Public Works Department of the City of Grass Valley requests clarification of the following:
1. Shouldn't the "Sewer Capacity Study" dated December 27, 2007 by Sauers Engineering, Inc., be signed and stamped by a licensed engineer?



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2. The sewer tie in location on Idaho-Maryland Road shows the sewer service crossing the Bouma property and tying into the sewer main on the Robertson parcel. Where will the sewer service be tied in if easements cannot be obtained? How will the sewer service be protected when crossing under the creek? What are the proposed sewer service elevations at the creek crossing and at the tie-in location?

DRAFT