



## WOLF CREEK COMMUNITY ALLIANCE

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*"Grass Valley - A creek runs thru it."*

Jan 18, 2009

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

Re: Comments on IMM DEIR

p. 4.1-9 "Water Features in the Project Vicinity"

This section is incomplete, listing only the two creeks. For example, there is a pond on the property just south of I-M Road between Railroad and Centennial. Please include descriptions of all other Water Features in the Project Vicinity, or explain why each one is ignored.

p. 4.1-12 "Grass Valley General Plan"

This section identifies only one item in the entire General Plan of the City of Grass Valley that *"would be applicable to the proposed project."* This item is described as Policy 10-CDI. In fact, this is not a Policy, but rather an Implementation Action and Strategy. Please correct this error, and identify all other Goals (G), Objectives (O), Policies (P), and Implementation Actions and Strategies (I) from the General Plan that apply to the project. For instance, at a minimum in Chapter 10 (Community Design) alone, all four Goals (CDG 1-4) should be listed; CDOs 3,4,5,6,7,8,10,11,13,14,17,18; CDPs 3,4,11,13,14,15,16,20,22; and CDIs 3,4,5,8,10,11.

Another example of a Policy that should be included is Recreation Policy #1 (1-RP), which describes trails, bicycle paths, linear parkways, and park-like natural areas. This Policy should specifically be addressed by this project, and in this DEIR, especially since the adoption of the Wolf Creek Parkway Alignment Study and Conceptual Master Plan, which clearly delineates a linear parkway on the property in question.

Please review the other chapters of the General Plan to identify items that are applicable to the proposed project.

Impact 4.1-3 (Visual Degradation) This section does not address the visual degradation that may be caused by extension of NID water lines to properties who will need replacement water due to dewatering. Please address the visual (and other) impacts of these construction projects.



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Impact 4.1-4 (Visual Degradation). Please address the potential visual degradation caused by the perimeter fence (*"eight-foot high chain link fence topped with razor or barbed wire"*) in the vicinity of the proposed Wolf Creek Parkway along Wolf Creek at I-M Road, as viewed by pedestrians, bicyclists, and equestrians who will be using the trail.

Section 4.12 Recreation. The references to the Wolf Creek Parkway and related easements in this section are confusing. 4.12.3 states that *"IMMC's proposed site plan identifies a 100-foot easement that conforms to the Floodplain Setback Zone in which it is envisioned that the Wolf Creek Parkway would be established and thus, it is unlikely that the proposed project would conflict with this plan. The Wolf Creek Riparian Buffer Area (comprising 4.4 acres) would be available for public use during the project life, and is expected to be available to the City upon site reclamation."* This ambiguity will lead to problems, and will potentially block construction of the Parkway indefinitely. ("Available for public use", but no easement until reclamation? How can the Parkway be built on an "identified" but ungranted easement?) I suggest a clearer mitigation: ***"An easement for the Wolf Creek Parkway shall be made a condition of this project, and the easement shall be granted to the City before any work on the project is commenced. In addition, the applicant shall prepare a phased implementation plan, and construct the segment of the Parkway on the property. The goal shall be to construct Alternative 3 'Baby Steps' within 5 years of approval of the project, and the Preferred Concept within 10 years."*** Likewise, Mitigation Measure 4.12-1 requires the applicant *"to make its historical display/park available to the public free of admission"*, but Impact 4.12-2 states that the display/park would be constructed by the City. Please clarify what the intent of this section is, and how the City's goal of a linear parkway will be achieved.

The environmental impacts of the construction of the display/park, the trail leading from the display/park, and the segment of the Wolf Creek Parkway should be addressed by this document, whether they are included as part of the project or as part of the cumulative impact.

Thanks for your attention.

Jonathan Keehn, President  
Board of Directors  
WCCA