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August 12, 2021

Natalie Rizzi
Tuolumne County Community Development Department
2 S. Green Street
Sonora, CA 95370

RE: Site Development Permit SDP20-005, Preserve Partners, Mitigated Negative Declaration

Dear Ms. Rizzi,

The Groveland Community Services District (GCSD or District) appreciates the opportunity to submit comments on the mitigated negative declaration prepared for the Highway 120 Lodging Hospitality Project, Site Development Permit SDP20-005. The district is a responsible agency under CEQA for this project as it will be approving and providing water, sewer, fire, park and recreation services, and approving the construction and extension of associated utilities.

Since this project requires the extension of infrastructure and its ultimate dedication to and acceptance into the GCSD publicly maintained system, we are required to ensure that the CEQA document being adopted is adequate and meets the requirements of the district as well. We are suggesting corrections and clarifications be included in the final adopted mitigated negative declaration for the project, and/or included in the conditions for project approval so that the District can accept this MND as adequate for the project development.

- The District's [Service Feasibility Report](#) dated April 27, 2021, including the engineering technical memorandum was omitted from the MND and should be referenced appropriately in the documents and included in the appendices thereto. This report details locations of water and sewer system connections and extensions, prescribes water flow limitations, identifies the requirements for the installation of a private fire protection system including hydrants and fire water storage tank; none of which were referenced specifically in the MND. The location of connection to existing utilities was not shown on the project site plan or phasing plan, and are both located off of the project site. Lacking reference to the feasibility report, it is difficult to determine if the utility construction impacts have been fully evaluated.
- **Section 1.4, Table 1-2 Project Approvals and Permits.** The following local permits and authorizations were omitted from the documents and are required by GCSD:
 - Encroachment Permit (construction work within GCSD water and sewer easements)

- Plan Check and Construction Inspection Agreement (Establishes terms and conditions for utility construction, inspection and dedication to GCSD)

Please add the above GCSD permit and Agreement to Table 1-2.

- **Section 3.15, Public Services, Table 3.15-1**

- Table 3.15-1 is incorrect and should list Groveland Community Services District/Groveland Fire Department as the jurisdiction responsible for fire protection services. The providers listed in Table 3.15-1 (Calfire and TCFD) respond to emergency calls within the GCSD boundaries under Automatic and Mutual Aid Agreements, if and when they are needed and available. **Please correct Table 3.15-1 to reflect the appropriate service provider.**
- Paragraph 3.15.1.1 - The Fire Protection language is confusing in terms of the responsible agency for fire services; please amend the paragraph accordingly. Fire protection, fire suppression and life and property emergency response for the project site is the jurisdictional responsibility of the Groveland Community Services District Fire Department. The providers listed in Table 3.15-1 (Calfire and TCFD) respond to emergency calls within the GCSD boundaries under Automatic and Mutual Aid Agreements, if and when they are needed and available.

Please modify the language of paragraph 3.15.1.1 to read as follows: The nearest fire station to the Project site is GCSD's Groveland Station 78 located approximately two miles northeast of the Project site (Tuolumne County, 2020a). The GCSD Fire Department provides services to the community under a Cooperative Fire Protection Agreement with CALFIRE. Fire services will be provided from that Station 78, in which GCSD is planning in the future for increased equipment and staffing to maintain acceptable service ratios, response times and performance objectives during project operation. The Project will annex to the District's Community Facilities District 2021-01 (Public Services) to provide proportional funding toward GCSD's enhanced services as a condition of receiving fire and park services.

Tuolumne County Fire Department (TCFD) is a cooperative fire department with California Department of Forestry and Fire Protection (CAL FIRE). ~~Within the County, TCFD/ CAL FIRE along with eight fire districts provide life and property emergency response and wildland fire protection services throughout the County and including to the Project site under Mutual Aid Agreements. The nearest fire station to the Project site is Groveland Station 78 located approximately two miles northeast of the Project site (Tuolumne County, 2020a).~~

~~The Groveland Community Services District (GCSD) also provides fire services. The GCSD currently has a cooperative agreement with CAL FIRE to provide fire protection services for the community.~~

- **Section 3.16.2 Recreation Impact Analysis - modify language to read:**

The Project would increase the area's tourist population and number of visitors at GCSD's Community Park facilities, the Yosemite National Park and Stanislaus National Forest.

- **Section 3.19.2 Utility Impact Analysis - Add/modify language as follows:**

- Include reference to the GCSD issued Project Feasibility Letter and include in the appendixes.

Installation of the utility infrastructure required for the Project would occur in existing road ROW, easements, during site grading activities and subject to conditions of GCSD construction standards and specifications, permits issued by the GCSD, Caltrans Encroachment Permit and SWPPP; therefore, resulting in a less than significant impact.

The District operates 16 sewage pumping stations serving Groveland, Big Oak Flat and PML. The project site will be served through an existing lift station, reconstructed in 2016 and having capacity for the project without expansion.

The Project involves the installation of water and sewer service connections to the existing District utilities located in the CalTrans right of way and within easements adjacent to the Project. The portions of the water and sewer service connections located in district easements and road right of way will be dedicated to the District for ownership and operation, to their point of termination within the Project.

- **Section 3.19.2 Utilities Impact Analysis - Add/modify language as follows:**

Subparagraph b. GCSD water supply is provided under its agreement with the San Francisco Public Utilities Commission from its Hetch Hetchy system. As detailed in the GCSD Project Feasibility Report, there is adequate water supply available to the project through the GCSD system. The applicant will receive a Will Serve Letter from the GCSD upon the execution of the District's Plan Check and Construction Inspection Agreement. Implementation of the Agreement which includes terms and conditions related to utility design in accordance with District standards, construction, inspections and utility dedication, as well as operation of the Project in compliance with District standards, ordinances, rules and regulations for service will result in a less than significant impact.

MM UTIL-1: Will Serve Letter. Prior to construction, the applicant will enter into a Plan Check and Construction Inspection Agreement with the Groveland Community Services District and obtain a Will Serve Letter from the District for the Project. The applicant will abide by all GCSD Agreements, rules and regulations applicable to the Project and its development and operation.

Subparagraph c. - The Project would be serviced by GCSD. The proposed Project's sewer demand is estimated to be approximately 20,370 gallons per day (Land and Structure, 2020). As detailed in the GCSD Project Feasibility Report, GCSD has the capacity to service the Project development subject to the terms and conditions of the Plan Check and Construction Inspection Agreement discussed above, and in compliance with District rules, regulations and ordinances; therefore, resulting in a less than significant impact.

- **Add paragraph 3.20.2.5 or add to language in 3.15.1.1 Fire Protection - [Groveland Community Services District, Fire and Emergency Response Deployment Standards](#).**

The GCSD adopted a [Fire Department Master Plan](#) update on May 12, 2020 which identified facility, financial and staffing resources needs to ensure the continued viability of the fire services provided by GCSD. Recommendations detailed in the plan included the creation of additional revenue sources to

keep the existing services viable and to increase staffing and equipment with the growth in service demands and call volume as the community grows. The Master Plan further recommended the adoption of Groveland Fire Department Deployment Standards which establish emergency response time goals for the purpose of planning future facilities, equipment and resources as the community grows. The District formed [Community Facilities District 2021-01 \(Public Services\)](#) to provide additional funding for the fire department to assist its ability to serve community and call volume growth and continue to meet adopted deployment standards as desired in County General Plan Policy 9.E.2 and 9.E.3.

- **Add to Section 3.15.3 Public Services or Section 3.20.3 Wildfire Impact Analysis**

Although the number and severity of calls for emergency services related to the project are expected to be small, any increase in emergency call volume could result in service impacts including the ability to keep small, emerging incidents and fires under control. Fire department staffing shortages were identified in the GCSD Fire Master Plan. In addition, there has been an increased number and severity of wildfires in the past two years creating additional demand for CALFIRE resources to leave the GCSD area. GCSD has adopted Groveland Fire Department Deployment Standards which establish emergency response time goals in accordance with the NFPA for the purpose of planning future facilities, equipment and resources as the community grows. To ensure that emergency response times remain within GCSD adopted standards, GCSD formed [Community Facilities District 2021-01 \(Public Services\)](#) to provide funding to increase department staffing in the future to address any growth related impacts.

Add Public Services or Wildfire Mitigation Measure:

Prior to construction, the applicant will annex to GCSD Community Facilities District 2021-01 (Public Services). Annexation to the GCSD Community Facilities District will offset financial impact to GCSD fire services and effects on the department's ability to achieve its response and deployment plan standards.

Again we appreciate the opportunity to review and comment on the project. Please feel free to contact me directly should you have any questions.

Sincerely,



Peter J. Kampa
General Manager

cc: GCSD Board of Directors
Jaren Nuzman, TK Consulting, Inc