



Erin Ventura
Planning Department
City of Plymouth
9426 Main Street
Plymouth, CA 95669

June 16, 2021

Dear Ms. Ventura:

Foothill Conservancy congratulates the City of Plymouth on its determination of the need for a full EIR on the proposed Greulich Ranch Subdivision and 49er Village RV Resort Expansion Project. A project of this size and scope warrants a thorough analysis of potential impacts on environmental resources and community facilities and services.

Our primary concern about the proposed development is how water and wastewater services will be provided to meet the needs of 448 new households. Our understanding is that both the Amador Water Agency's Tanner treatment facility that supplies treated water to Plymouth and the AWA's lone water treatment plant are at or over capacity and in need of substantial maintenance and upgrading. Refer to the recently prepared AWA Water Master Plan Study: <https://amadorwater.org/wp-content/uploads/2021/02/AWA-Water-Master-Plan-FINAL-2021-01-28.pdf>

We are also concerned about effects on vernal pools, wetlands, oak woodlands, air quality and cultural resources in the affected area. In addition, it is important to identify impacts on the existing community including aesthetics, traffic circulation, noise, recreation resources, schools, working ranches, and demand for emergency services.

Even though the Amador Air District has not yet established thresholds of significance for greenhouse gas emissions, this analysis will need to be completed to satisfy current CEQA requirements—as will a transportation analysis using Vehicle Miles Travelled methodology. We hope the City of Plymouth will strive to improve bike paths and enhance “walkability” as future neighborhoods are built. The EIR should explain how the project meets the “complete streets” objectives of providing a multi-modal transportation system, including opportunities for walking and biking to commercial establishments and public services. We hope your consultant

will identify and analyze project alternatives that would result in reducing environmental impacts and/or enhancing such community benefits.

Thank you for the opportunity to comment. We look forward to reviewing the Draft EIR when it becomes available, so please keep us informed about progress on the environmental review and any pertinent public meetings.

Sincerely,