

Response to Comments for the Rocky Ridge Apartments Initial Study/Mitigated Negative Declaration (IS/MND)

The Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Rocky Ridge Apartments project (PL23-0351) was issued on April 4, 2025 and circulated for public review and comment over a 20 day period that ended on April 24, 2025. The California Environmental Quality Act (CEQA) requires a review period of no less than 20-days for MNDs (Refer to CEQA Guidelines Section 15073(a)). During the public review period, the City received two (2) comments on the IS/MND. One comment was a letter was from the Maidu Neighborhood Association Committee and one comment was an email from an individual. The complete text of the written comments, and the City's responses to those comments is presented in this section. A copy of each comment, marked in the margin with the response numbering, is followed by its corresponding response(s). Good faith, reasoned, factual responses have been provided to all comments received that raise environmental issues. Detailed responses have been provided where a comment raises a specific issue, and a general response has been provided where the comment is relatively general. Comments that are outside the scope of CEQA review are noted and a response is included that will be forwarded to the decision-makers for consideration when deciding whether to approve or deny the Proposed Project.

Maidu Neighborhood Association Committee

(Member of the Roseville Coalition of Neighborhood Associations RCONA)

Proposed Infill

Development 1995 Rocky Ridge

Drive (PL23-0351)

2024 JUN 24 AM 3:20

ROSEVILLE, CA

The intent of this document is to share information with neighbors through the Maidu Neighborhood Association (**MNA**), City of Roseville staff, and the developer of the proposed project. The presented information includes, a brief overview of the proposed project, information from the City of Roseville (with its consultants), and feedback from neighbors. Based on this information, it is the goal of the MNA committee to present recommendations to be considered for implementation as much as possible.

Background:

The proposed project is an 18-unit multi-family project on a 1.23-acre Medium Density Residential (MDR-10) parcel within the City's Infill area at the corner of Rocky Ridge Drive and South Cirby Way. The development consists of 18 units, with units ranging from one bedroom (Qty 2) to two bedrooms (Qty 16). The applicant also requests a density bonus of six (6) units for the project. Of the 18 residential units proposed on the property, 2 units will be affordable, and 16 units will be at market rate. A total of 27 parking spaces will be provided on-site. The project includes a Tree Permit (TP) to authorize the removal of 42 protected oak trees from the project site. This is the second time there has been proposed development of this site. The first proposal failed to move forward due to poor economic conditions during 2007-2010. The current proposal shows favorable improvements to the architectural elevations and other factors.

Project Applicant:

Sara Lebastchi, D and S Development

Property Owner:

SSL Enterprise LLC

Status as of April 2025:

The developer with representatives from the City of Roseville met with neighbors at the Maidu Neighborhood Association (MNA) monthly meeting on November 19, 2024. Neighbors expressed concerns, shared questions, and offered some positive feedback. The MNA Board asked for neighbor volunteers to create a committee to summarize feedback from neighbors, work with city representatives, and keep the MNA updated and make recommendations. The volunteer committee is headed by Lance Hibben, MNA Secretary.

PC Exhibit C

Environmental Impact Report (EIR):

The City of Roseville published a Mitigated Negative Declaration dated April 4, 2025. This document cites the city's Planning Manager has determined this project will not have significant effects on the environment and therefore does not require preparation of an Environmental Impact Report. For more details regarding the 250 page Mitigated Negative Declaration, it is available on the city's website at: <https://www.roseville.ea.us/environmeotatdocuments> (under Private Development Projects).

Written comments on the adequacy of the Mitigated Negative Declaration must be received no later than 5:00 pm on April 24, 2025.

The MNA asked the city if the April 24, 2025 date can be delayed due to the timing of our neighborhood newsletter cycle. The Mitigated Negative Declaration notice was provided after the April newsletter went to be published and the deadline (for public comments) is before publishing the May newsletter. The MNA can post the date onto its Facebook, Neighbors, and Nextdoor apps; however, the newsletter is the **MNA's** primary source of communication. The city would not delay the date so this is being submitted without time to fully share with the neighborhood.

City of Roseville Planning Commission :

It is anticipated the project will be on the agenda for an initial presentation to the City's Planning Commission on May 8, 2025. The meeting is planned to be at the City Council chambers located at 311 Vernon Street.

Feedback from Neighbors at November 19, 2024 MNA Meeting:

Comment #1

Attendee questions and concerns were almost entirely focused on safety, traffic, the proposed parking lot, and environmental questions. In addition, attendee concerns became elevated when city staff indicated the current roadway design (based on the City's 2020 Base Travel Demand Model) was adequate for mitigating the increased traffic generated by the project. This does not account for increased traffic generated by four different Placer County projects (outside of Roseville's boundaries) located approximately within three miles from the proposed project site. Combined, these projects create an additional 418 resident units.

Feedback from Neighbors and Business Representatives *after* November 19, 2024:

Comment #2

After the MNA meeting on November 19, 2024, a survey of neighbors and business representatives was conducted regarding the proposed project. The findings from this survey reveal the proposed development is *strongly not supported* by approximately 200 neighborhood residents and local business owners. Respondents who were interviewed did not support the proposed project based on the previously identified issues involving pedestrian safety, the proposed parking lot, traffic congestion, and environmental impacts. Based on respondent comments, the proposed development lacks "common sense" and is a "poor business decision" that requires alternatives. Some residents asked if the city could acquire the privately owned property from the owner to be incorporated into the city's planned nature/bike trail. Additional comments indicated a desire for elected officials to ensure the City of Roseville continues to be a very desirable community to raise a family, operate a business, and live during retirement. Comments included a need for the proposed project to be reconsidered.

PC Exhibit C

The following information provides more specific details about identified concerns and questions:

Safety Concerns:

Neighbors' Concerns about Pedestrian Safety

Pedestrian safety is a paramount issue. The intersection at South Cirby Way and Rocky Ridge Drive has several existing unusual factors requiring pedestrians to navigate. These factors are described below:

1. The merger of the two roadways produces three (not four) thoroughfares. The traffic signals restrict traffic by allowing only one thoroughfare to proceed at a time.
2. There are only two crosswalks.
3. Along the south side of South Cirby Way near Rocky Ridge Drive, there are about 14 existing multiple family homes/duplexes which have driveways with unrestricted access (entering/exiting) directly into/from traffic on South Cirby Way. Some driveways have limited visibility of traffic due to the curve (reference photo on page 3 of the consultant's report as an example). Residents of these duplex units place their garbage pick-up cans for weekly pick-up onto the sidewalk (blocking pedestrians from using the sidewalk) for trash pick-up days. Trash cans placed on the street can interfere with traffic on the south side of South Cirby Way.
4. The intersection includes a variety of traffic directions. For example, there is one right turn lane from southbound Rocky Ridge Drive, one lane on eastbound South Cirby Way that provides an option to proceed straight through the intersection or turn left onto northbound Rocky Ridge Drive, another lane on eastbound South Cirby Way is dedicated to only proceed directly through the intersection (staying on eastbound South Cirby Way), and four left turn lanes - two from southbound Rocky Ridge Drive and two from eastbound South Cirby Way, and there is an absence of a dedicated right turn lane on westbound South Cirby Way (ref #7 below). All vehicle traffic is controlled by three sets of signal lights that operate one at a time.
5. Students and athletes attending Oakmont High School use this intersection during peak traffic times to walk and bike to/from school and in the afternoons training for cross country and track competitions. On weekly trash pick-up days, students using the sidewalk along the south side of South Cirby way avoid trash cans placed onto the sidewalk (reference #3) by walking into a traffic lane on South Cirby Way or walk into resident front yards.
6. South Cirby Way includes a significant curve directly into/from the intersection that somewhat impairs visibility (reference the consultant's report pages 2, 3, and 12 regarding chevron signs and vehicle accidents).
7. There is no dedicated right turn lane on westbound South Cirby Way for drivers turning onto northbound Rocky Ridge Drive. The absence of a dedicated right turn lane forces drivers to:
 - a. "Squeeze" past other vehicles (stopped and waiting at the traffic light) or
 - b. Wait for the signal light to change if "squeezing" past other vehicles is not possible. The later can cause more vehicles to be stopped at the intersection increasing traffic and forcing drivers to wait for two or three traffic signal cycles to

Comment #3

clear the intersection (refer to Attachment 1).

Comment #3
continued

8. At this same location (westbound South Cirby Way), the project's proposed Driveway #2 is planned to be located.

The proposed 18-unit apartment complex plus Placer County's projects are expected to increase traffic at this intersection (reference Traffic Concerns section). Additionally, pedestrian risks are compounded by the concerns presented in the Parking Lot section. It should also be noted that late afternoon sun is low on the horizon over westbound South Cirby Way temporarily impairing westbound driver visibility.

Traffic Concerns:

Comment #4

Neighbors are concerned about the City's reliance on the 2020 Base Travel Demand Model that does not include consideration to nearby Placer County Projects.

Although the 18-unit Rocky Ridge project *itself* may not generate significant increases in traffic (per the city's Traffic Study); nearby Placer County projects (combined) will add another 418 more housing units that were not factored into the Fehr and Peers consultant report (Project Travel Characteristics on page 4). As a result, the MNA committee is advocating changes presented in the Improvement Recommendations section. The following provides more details about the Placer County projects that are located within three miles of this intersection.

Overview of Placer County Projects:

1. The Park at Granite Bay (55 units)
2. Sequoia Grove Retirement Independent living (145 units)
3. WellQuest of Granite Bay independent, assisted, and memory care (122 units)
4. Placer County Site #29 (96 units)

The Park at Granite Bay, 3700 Fletcher Drive (intersecting at Sierra College Blvd. north of Old Auburn Road) is currently under construction offering sales of luxury single family homes.

Sequoia Grove Retirement Homes, 3905 Old Auburn Road is finished being constructed and is primarily an independent retirement community that includes parking spaces or garages for residents. As of April 2025, they are advertising available units for occupancy.

WellQuest of Granite Bay, 9747 Sierra College Blvd. (South of Old Auburn Road) is finished being constructed and currently provides independent living, assisted care, and memory care options. About half of their units are designated independent living units which includes parking for residents. The WellQuest project was completed prior to Sequoia Grove and is near full occupancy.

PC Exhibit C

Comment #4
continued

Site #29, 3865 Old Auburn Road is a planned high density housing project to be located on a 4.8 acre privately owned lot immediately next door to the Sequoia Grove residences. This project is part of Placer County's plan to meet State of California housing requirements and was approved by the County Board of Supervisors in May 2024. There is no current construction timeframe currently available.

All of these Placer County projects are located near the intersection of Sierra College Boulevard and Old Auburn Road, approximately three miles from the proposed project site. Most likely, traffic generated from these projects will use westbound South Cirby Way through the intersection at Rocky Ridge Drive (rather than using Douglas Boulevard) to access westbound Interstate-80 towards Sacramento (plus trips to local restaurants, grocery, and other businesses).

Although it's unknown the amount of traffic the residents at the two retirement communities will generate, it is still expected there will be increased traffic involving residents, visitors, and vendors traveling to/from these facilities.

Parking Lot Concerns:

Comment #5

The proposed 18-unit apartment complex includes sixteen 2-bedroom units plus two 1- bedroom units (a total of 34 bedrooms). The proposed parking lot offers 27 parking spaces with *no parking for visitors*. Assuming these bedrooms could occupy up to two adult residents per bedroom, there could be a maximum of 68 residents (less than one- half parking space per resident). This comparison of up to 68 residents for 27 parking spaces may be extreme; however, the current proposal for 27 parking spaces for 34 bedrooms is less than one parking space per bedroom. It is unclear if parking spaces will be assigned to specific residential units or not.

The absence of visitor parking is a high concern from neighbors and businesses: At the November 2024 MNA neighborhood meeting, it was not clear where visitors to the apartments will park. Assumptions that visitors might park across Rocky Ridge Drive inside the business parking lot or on Condor Court are ill advised, especially from a pedestrian perspective. If visitors use the business parking lot or Condor Court (across Rocky Ridge Drive) it would require visitors to walk *indirectly* 250 feet (per consultant report on page 5) to the intersection to safely and legally use the cross walk to cross Rocky Ridge Drive. However, it is more than likely some visitors will be tempted to walk *directly* to the apartments by "J-walking" across Rocky Ridge Drive increasing the risk of a vehicle accident involving a pedestrian. The survey of interviews conducted after the November 19, 2024 MNA meeting (unsurprisingly) revealed business owners were not supportive of using their privately-owned parking lot for people visiting residents at the apartments. These businesses are assigned limited parking spaces by the property manager. Parking issues *already exist* within this parking lot and have involved vehicles being towed away from the lot.

PC Exhibit C

Comment #6

ADA Parking: It is also noted that it's unclear if there are parking spaces reserved for people with disabilities. The project parking lot requirements related to the Americans with Disabilities Act (ADA) are unknown by neighbors but assumed there will be compliance.

Comment #7

Driveways: The parking lot includes two proposed driveways. One on northbound Rocky Ridge Drive (Driveway #1) and the other on westbound South Cirby Way (Driveway #2).

The city's Fehr and Peers consultant report provides recommendations for Driveway #1 based on city standards and **discretions**. Driveway #1 would permit all turning movements and recommends a northbound deceleration taper to enter the parking lot, not a deceleration lane. The consultant report indicates the project does not meet the city's standards for the location of Driveway #1 or a deceleration lane on pages 5 and 7, respectively. If possible, neighbors would like to know if discretion can also be applied to allow for a deceleration lane for Driveway #1.

The city's Fehr and Peers consultant report recognizes there are issues with Driveway #2 (in addition, reference 8 issues from Neighbors' Concerns about Pedestrian Safety section). The consultant report recommends restrictions for only right turns in and right turns out for Driveway #2. The consultant's report recommends building a raised triangular median within Driveway #2 to encourage right hand turns only. The consultant's report also recognizes there are no proposed changes to South Cirby Way. There is no plan to effectively prevent eastbound left turns into Driveway #2.

Neighbors are concerned a raised triangular median within Driveway #2 would not effectively prevent ALL left hand turns in and out of Driveway #2. Neighbors are also concerned the raised triangular median may impede allowed right hand turns from westbound South Cirby Way into Driveway #2.

There is support for the consultant's recommendation to restrict Driveway #2 to right turns only; however, neighbors are hoping the city will show discretion to mitigate concerns about Pedestrian Safety (concerns 4, 6, 7, and 8) and the consultant's recognition of no proposed changes to South Cirby Way. Maidu neighbors advocate an effective prevention of all undesired turns into/from Driveway #2 by constructing a raised median and/or flexible delineators (pylon) in the center of eastbound and westbound South Cirby Way.

Neighbors Environmental Questions Regarding Proposed Rocky Ridge Project:

Comment #8

Since the proposed project site is within close proximity to Linda Creek, many residents who are familiar with the creek's flood history asked about flooding risk. At the November 19, 2024 MNA meeting, city staff explained the project site topography is significantly elevated above the creek and is not within the updated flood zone.

Comment #9

Some neighbors questioned the removal of existing trees from the project site. City staff acknowledged the removal of trees and the related mitigations. The survey of neighbors provided feedback related to the natural habitat. Nut trees that are planned to be removed provide food to squirrels which in turn provide food for raptures that nest in oak trees.

PC Exhibit C

Comment #10

Some neighbors have toured the existing project site and still have a question about 3-4 large oak trees. It is unclear whether these large trees are planned to be removed because they are located on the project north perimeter on sloped topography between Linda Creek and the project site. It is hoped these habitats will not be disturbed and the large oak trees will not be removed.

Comment #11

Neighbors are concerned and demand an Environmental Impact Report (EIR) to address the impact of increased traffic on natural habitats along Linda Creek. Neighbors specifically mentioned habitat concerns about observed species along/within the creek bed such as mink, beaver, salmon, raptors, quail, turkeys, squirrels, seasonal frogs, turtles, and other species of fish. Approximately 200 neighbors and business representatives that were interviewed strongly oppose the proposed project for these reasons.

Comment #12

Neighbors asked if the proposed project will affect the city's planned Dry Creek Greenway trail project. This project involves two phases. Phase 1 (west) is currently under construction at Darling Way near Riverside Boulevard and is expected to be completed to Rocky Ridge Drive in 2026. Phase 2 (east) extends from Phase 1 at Rocky Ridge Drive next to Linda Creek just north of the proposed project site. City staff indicated the proposed project should have no effect on the trail project. Currently, plans to link Phase 1 and Phase 2 include a tunnel along the creek proceeding under the pavement at Rocky Ridge Drive. Phase 2 is currently planned for completion in 2027.

Improvement Recommendations (1-8):

Comment #13

1. Planning for this proposed project should not be done "in a bubble" and must consider the "big picture". It is recommended and prudent to include consideration to the described 418 additional housing units from Placer County projects that are within three miles of this project and will increase traffic at the intersection of South Cirby Way and Rocky Ridge Drive.

Comment #14

2. To effectively prevent all undesired turns into/from Driveway #2, construct a raised median and/or flexible delineators within the center of South Cirby Way (between eastbound and westbound lanes). Implementing this recommendation could eliminate the consultant's suggested raised triangular median inside Driveway #2 and associated concerns.

Comment #15

3. The MNA committee is asking the city to use discretion by adding a dedicated right turn lane on westbound South Cirby Way to proceed northbound on Rocky Ridge Drive. The absence of a right turn lane is *already a traffic issue* and is expected to become worse.

Comment #16

4. The MNA committee strongly recommends changes to the proposed parking lot as follows:

- a. Increase the number of parking spaces by 7 or reduce the number of housing units so that (at least) a one-to-one ratio (bedrooms to parking spaces) is achieved.
- b. Ensure the proposed project is compliant with ADA parking spaces.
- c. Include a reasonable number of visitor parking spaces.
- d. Create designated parking spaces assigned to each specific housing unit.

PC Exhibit C

- Comment #17** { 5. The MNA committee is asking the city to use discretion by adding a deceleration lane into Driveway #1 on northbound Rocky Ridge Drive. }
- Comment #18** { 6. There is a "cluster" of 3-4 large oak trees at the north perimeter of the project site (within the sloped topography between Linda Creek and the proposed parking lot). It is not clear if these trees are planned for removal or not. It is recommended these trees not be removed as they will be a desirable aesthetic for the city's second phase of the Dry Creek Greenway trail project. See attachment 2. }
- Comment #19** { 7. Avoid or minimize the disruption to the natural habitat as much as possible. An Environmental Impact Report would help make neighbors more confident these habitats are fully analyzed and mitigated. }
- Comment #20** { 8. Although it has not been previously planned/addressed, construct an aesthetic wall approximately 30 inches high providing separation between the housing units and vehicle traffic on South Cirby Way and Rocky Ridge Drive. The benefits of this wall are:
 - a. Provides protection for the housing units in the event of vehicle accidents near the intersection of South Cirby Way and Rocky Ridge Drive.
 - b. Provides a location in which to provide the name of the apartment complex.
 - c. Helps to control pedestrian access to the apartment complex and protect landscaping.
 - d. Compliments the aesthetics of the apartment complex by combining hardscape with planted landscape. }
- Comment #21** { 9. Reconsider the land use of the proposed development project and incorporate the property into the future Dry Creek Greenway East Trail: Phase 2. }

Attachments

Maidu Neighborhood Association

(Member of the Roseville Coalition of Neighborhood Associations RCONA)

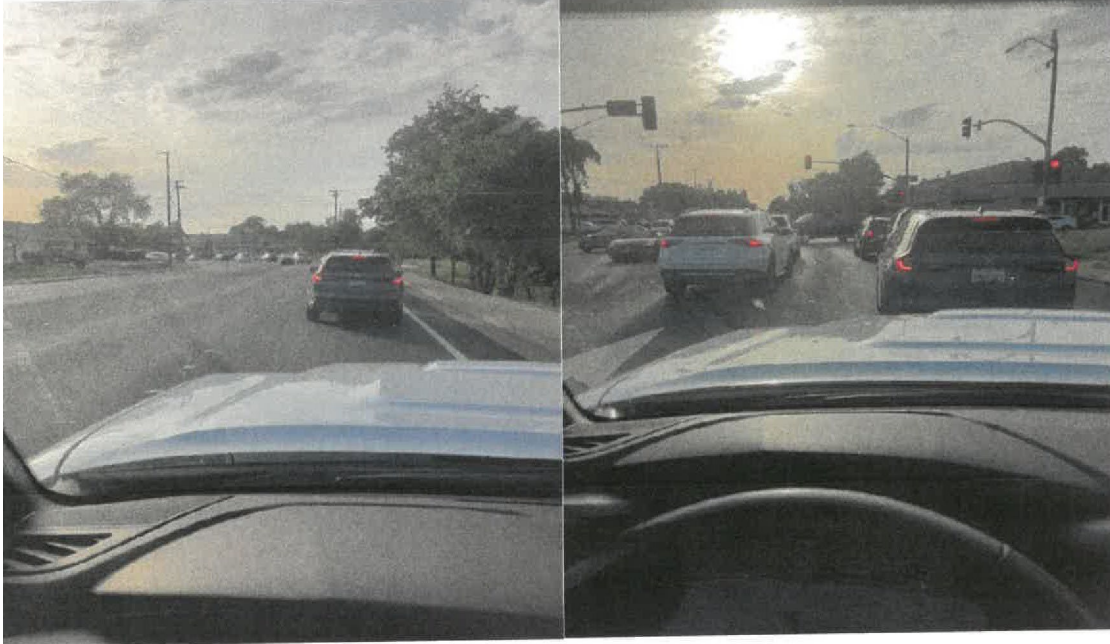
Proposed Infill Development

1995 Rocky Ridge Drive (PL23-0351)

Attachments

Attachment 1

All photos arbitrarily taken on Tuesday, April 15, 2025 at 6:15pm on westbound South Cirby Way approaching the intersection at Rocky Ridge Drive.

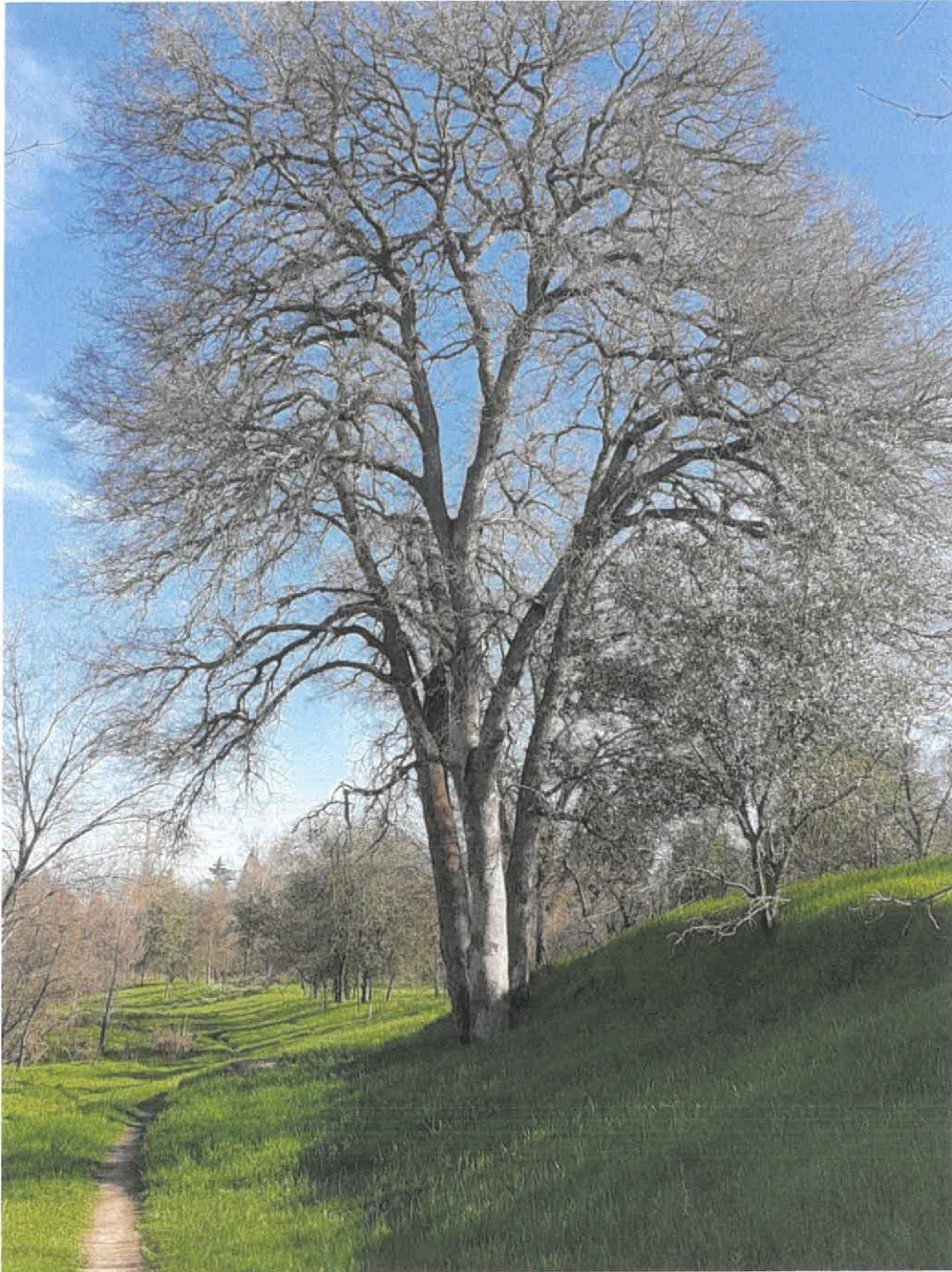


Two signal cycles to get through intersection at Rocky Ridge Drive



Vehicles in rearview mirror still waiting at intersection.

Attachment 2



Oak trees located between proposed parking lot and Linda Creek

Response to comments from the Maidu Neighborhood Association Committee

Response to Comment #1: The comment describes feedback from the 11/19/24 neighborhood meeting and describes general concerns raised with the project and is not a comment on the adequacy of the environmental document. The project staff report and this response to comments document includes information related to safety, traffic, parking and environmental issues.

Response to Comment #2: The comment describes feedback from the residents and business owners after the 11/19/24 neighborhood meeting and describes general concerns raised with the project and is not a comment on the adequacy of the environmental document. The project staff report and this response to comments document includes information related to safety, traffic, parking and environmental issues.

Response to Comment #3: The comment describes concerns related to pedestrian safety and includes a description of pedestrian infrastructure, roadway and intersection design, and a description of pedestrian and automobile activity in the vicinity of the project site.

The Transportation section of the Initial Study supporting this Mitigated Negative Declaration includes the following analysis regarding the proposed project impacts on the City's circulation system, including transit, roadway, bicycle, and pedestrian facilities:

"The City of Roseville has adopted a Pedestrian Master Plan, Bicycle Master Plan, and Short-Range Transit Plan. The project was reviewed for consistency with these documents. The project will include the completion of a portion of sidewalk missing on the southern Project boundary. With this improvement, the surrounding pedestrian, transit, and bicycle facilities adjacent to the Project will be complete and the project will not decrease the performance or safety of those facilities. The project will provide pedestrian connections to the existing sidewalks along both streets and to the planned Class I bike trail to the east. The Dry Creek Greenway East trail system is also currently under construction and will be located offsite to the north of the Project, along Linda Creek. The project is consistent with these plans. In addition, the proposed project is consistent with the underlying land use designations, and does not contribute new, unanticipated trips; a cumulative conditions traffic model is not required."

As described in the excerpt from the Initial Study above, the analysis evaluated consistency with adopted multi-modal transportation plans and potential impacts related to safety. The Fehr and Peers study closely evaluated the operation and design of facilities which would be impacted by the project, including bicycle and pedestrian facilities, and evaluated sight distances and other design factors impacting safety. The study concluded that with the proposed modifications included as mitigation and as conditions of approval, the project would result in safe and adequate designs. The comment describes the existing design and operations surrounding the project site, but do not address the study at all, or identify any deficiencies of the study or its conclusions.

Furthermore, the proposed project will increase traffic at this intersection from the existing condition by only nine (9) vehicle trips during the PM peak hour. This equates to one additional vehicle using the intersection every 6 to 7 minutes on average during the busiest time of the day, which is not a substantial impact to existing operations or existing design conditions. This traffic, along with the traffic being generated from surrounding jurisdictions, has already been modeled in the City's Traffic Demand Model, which evaluated cumulative conditions resulting from buildout of

the City and surrounding jurisdiction land uses, and is consistent with the City's General Plan polices related to transportation. As such, staff has concluded that the proposed project will have no significant impacts to traffic, bicycle, or pedestrian operations at this intersection.

Response to Comment #4: The comment asserts that the City's 2020 Base Travel Demand Model does not consider several nearby projects under development in Placer County. The comment lists a number of projects in Placer County.

As described in the Response to Comment #3, this assertion is incorrect. Traffic from foreseeable development in surrounding jurisdictions is included in the City's Traffic Demand Model. The City's Model not only breaks up the City into over 500 Traffic Analysis Zones that are used to model City traffic under buildout conditions, but also includes over 1,300 Traffic Analysis Zones within surrounding jurisdictions adjacent to the City. Again, this project is consistent with the trips assumed in the model for this site and no significant impacts are anticipated.

Response to Comment #5: The comment describes concerns related to the number of proposed parking spaces. Parking is not an area the California Environmental Quality Act (CEQA) requires to be analyzed. Furthermore, as described in the staff report the applicant has requested a Density Bonus pursuant to Chapter 19.28 of the Roseville Municipal Code and Section 65915 of the California Government Code. By providing two (2) Very-Low Income units, this request allows for a 50% density bonus and qualifies the project to take advantage of the parking requirements described in Roseville Municipal Code Section 19.28.060.B.1 and California Government Code Section 65915(p)1, which state that the following parking requirements shall apply:

Zero to one bedroom unit: 1 on-site parking space

Two to three bedroom unit: 1.5 on-site parking spaces

The result is a parking requirement of 27 parking spaces. The proposed development includes 27 spaces and meets both the City and State codes.

Response to Comment #6: The comment asks about ADA parking spaces. The proposed project will be required to meet California Building Code standards for ADA parking spaces. The proposed site plan depicts 2 ADA accessible spaces.

Response to Comment #7: The comment relates to concerns with the proposed project's driveways, specifically for the driveway designs and proposed turning movements. The comment includes a request for median improvements within the Cirby Way right-of-way. As described in the Initial Study, an Access Study was prepared for the project by Fehr and Peers, one of the City's on-call traffic engineering consultants. The project has been designed and conditioned based on the professional recommendations of Fehr and Peers in conjunction with the City's Development Engineering staff and the City's Public Works Engineering staff. The Access Study concluded that the Rocky Ridge driveway (Driveway 1) does not meet the City criteria to warrant a right turn deceleration lane, therefore, the study did not recommend a right turn deceleration lane at this driveway. However, the City's Development Engineering staff determined that a right-turn deceleration taper should be added as a condition of approval given the volume of traffic on Rocky Ridge Drive and the presence of the S Curve immediately beyond the driveway. The staff report includes a conditioned requiring the construction of a right turn curb flare with the proposed

driveway on Rocky Ridge Drive. This will allow vehicles to merge into the curb flare from the #2 lane on Rocky Ridge Drive to safely enter the site. During the final review of the project, the City's Development Engineering staff also determined that a condition requiring a raised median curb within South Cirby Way, to ensure that left ingress and egress turn movements are physically prevented, from the proposed driveway, is appropriate. The staff report includes a condition to install this raised median curb within South Cirby Way.

Response to Comment #8: The comment is related to the proximity of the project to the floodplain. As described in the comment, the existing project site is elevated above the level of the Linda Creek floodplain and there is no development proposed within the floodplain.

Response to Comment #9: The comment describes concerns with the proposed tree removal. The project includes a request for a Tree Permit entitlement that would remove 42 protected trees. As described in the Initial Study, the proposed project will comply with City's Tree Preservation Ordinance (Chapter 19.66 Roseville Municipal Code) and explains that all impacts related to tree removal will be less than significant. It's important to note that for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified, CEQA Guidelines section 15183(f) allows a lead agency to rely on previously adopted development policies or standards as mitigation for the environmental effects, when the standards have been adopted by the City, with findings based on substantial evidence, that the policies or standards will substantially mitigate environmental effects, unless substantial new information shows otherwise (CEQA Guidelines §15183(f)). The City of Roseville adopted CEQA Implementing Procedures (Implementing Procedures) which are consistent with this CEQA Guidelines section. The current version of the Implementing Procedures were adopted in April 2008 (Resolution 08-172), along with Findings of Fact, and were updated in January 2021 (Resolution 21-018). The Findings of the Implementing Procedures indicate that compliance with the City of Roseville Tree Preservation ordinance (RMC Ch.19.66) will prevent significant impacts related to loss of native oak trees.

Response to Comment #10: The comment questions whether or not three to four large oak trees will be removed. Based on photos included in the comment document and the Arborist report, the three trees in question (insert numbers) are not proposed for removal.

Response to Comment #11: The comment requests the preparation of an Environmental Impact Report (EIR) to support the project. As analyzed in the Initial Study, there are no environmental issues that result in a significant impact that cannot be mitigated. Therefore, pursuant to CEQA, there is no requirement for the preparation of an EIR.

Response to Comment #12: The comment asks if the project will affect the City's Dry Creek Greenway Tail project. As described in Response #3, above, the proposed project will have no impact on the Dry Creek Greenway Tail project

Response to Comment #13: The comment relates to development outside of the City limits. See Response #3 and Response #4.

Response to Comment #14: The comment requests a raised median to be installed on South Cirby Way. As described in the staff report, and in Response #7, the City's Development

Engineering staff have determined that a condition requiring a raised median curb within South Cirby Way, to ensure that left ingress and egress turn movements are physically prevented, is appropriate. This condition is included within the Conditions of Approval located within the staff report.

Response to Comment #15: The comment requests a right turn lane be installed on westbound South Cirby Way. The City's Capital Improvement Program does not include a designated right turn lane from westbound South Cirby Way to northbound Rocky Ridge Drive. Therefore, the intersection is already constructed to its ultimate configuration and the proposed development is not being conditioned to construct additional intersection improvements. Per the previous responses (Responses #3 and #4), the traffic that will be generated from this projected has already been anticipated in the City's Traffic Demand Model that is used to determine intersection configurations, and the nine additional peak hour trips added by the project to the existing condition will not have significant impacts on intersection operations.

Response to Comment #16: The comment requests additional parking be included with the project. See Response #5.

Response to Comment #17: The comment requests a deceleration lane into the driveway on Rocky Ridge Drive. See Response to Comment #7. As stated above, the Fehr and Peers Access Study concluded that the Rocky Ridge driveway (Driveway 1) does not meet the City criteria to warrant a right turn deceleration lane, therefore, the study did not recommend a right turn deceleration lane at this driveway. However, the City's Development Engineering staff determined that a right-turn deceleration taper should be added as a condition of approval given the volume of traffic on Rocky Ridge Drive and the presence of the S Curve immediately beyond the driveway. The staff report includes a condition requiring the construction of a right turn curb flare with the proposed driveway on Rocky Ridge Drive. This will allow vehicles to merge into the curb flare from the #2 lane on Rocky Ridge Drive to safely enter the site.

Response to Comment #18: The comment asks about the status of a cluster of large oak trees on the northern perimeter of the site. The comment is supported by a picture within the comment letter. The comment appears to match Photo #3 on page 20 of the Arborist Report (dated June 20, 2024) and is in reference to tree #6408 and tree #6409. As described in the Arborist Report, these trees are outside of the project boundary and not scheduled for removal.

Response to Comment #19: The comment requests the preparation of an Environmental Impact Report. See Response #11.

Response to Comment #20: The comment requests a perimeter wall, along both street frontages, of approximately 30 inches in height. This is a comment on the project and is not related to the adequacy of the environmental analysis. There is no design guideline, or development standard requiring a decorative wall for a multi-family residential project. Further, the existing utilities and traffic signal infrastructure along South Cirby Way and Rocky Ridge Drive would most likely preclude the construction of a wall at this location.

Response to Comment #21: The comment requests the City reconsider the land use of the property and incorporate it into the Dry Creek Greenway Trail East project. This is a comment on the project and is not related to the adequacy of the environmental analysis. City Council has already approved

the trail designs, and the trail is under construction, and at no time has City Council indicated an interest in or need for this property as part of the trail project. Further, the property is privately owned, has a General Plan designation of Medium Density Residential and a Zoning Designation of Multi-Family Housing (R3) with an anticipated housing density that would allow for the development of 12 residential units. The California Government Code includes provisions that would preclude the City from reducing anticipated housing density in one portion of its jurisdiction without making up for the resulting reduction by increasing anticipated housing density in another area. As enacted in the 2019 legislative session, Senate Bill 330 (the Housing Crisis Act of 2019 or S.B. 330) created Government Code Section 66300. Subdivision (b)(1)(A) of that statute generally prevents a city from changing the residential general plan, specific plan, and zoning designation to “a less intensive use” or to reduce the intensity of the designation below what was allowed on January 1, 2018. An exception to this prohibition exists, however, where the city “concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction to ensure that there is *no net loss in residential capacity*” (Government Code § 66300 (h)(1), italics added). In order to change the land use on the subject property, the City would have to concurrently change the land use on another property within the City to allow for an additional 12 residential units to be developed.

From: Jennifer Chapman <jenchapman415@gmail.com>
Sent: Thursday, April 24, 2025 4:58 PM
To: Mar, Escarlet <EMar@roseville.ca.us>
Cc: City Clerk <CityClerkroseville@roseville.ca.us>
Subject: Re: MND comments - PL23-0351, 1995 Rocky Ridge Apts

**Chapman
Comment #1**

I meant to also note the following: Native valley oak trees can live to be 500 years old and have a special conservation status which is why many cities and counties require a permit before cutting them down. It is estimated that approximately 90% of the valley oak stands that existed in California prior to European contact have been destroyed by urbanization and intensive land conversion. (Anderson, 2005)

On Thu, Apr 24, 2025 at 4:56 PM Jennifer Chapman <jenchapman415@gmail.com> wrote:

Dear Ms. Mar,

I have several comments on the MND for the 1995 Rocky Ridge Apts project.

**Chapman
Comment #2**

For alignment with the City's Riparian and Creeks Management Plan, there should not be any protected trees removed within 100 feet of Linda Creek. See the attached letter by Foothill Valley Watershed Collaborative for previous comments on another project for the importance of the riparian buffer zone (100 feet) which is different than the riparian corridor.

**Chapman
Comment #3**

Please also be sure to check the Arborist / tree report for compliance with the City's tree ordinance. The ordinance and the tree report section of the MND are attached for reference. The MND for the project at 705 Sunrise Ave violated the tree preservation ordinance because it included a non-compliant arborist report which was not done by an ISA certified arborist which is one of the requirements in the ordinance. On that note, please confirm the credentials of the person who did the tree report for the Rocky Ridge Apts project. I was glad to see that this report did appear much more thorough and professional than the report for PL24-0812.

**Chapman
Comment #4**

Note that the City's general plan (2020) and the Roseville Creek and Riparian Management and Restoration Plan (2005) states:

In areas where preservation of the 100-year floodplain results in a buffer of less than 100 feet on each stream bank for perennial streams, opportunities should be sought for preservation to increase the size of these buffers. (RCRMRP, 2005)

Thank you for the opportunity to comment on the MND for the 1995 Rocky Ridge Apts project.

Sincerely,

Jennifer Chapman
Roseville, CA
415-419-4846
Jennifer Chapman 415-419-4846

Response to comments from Jennifer Chapman

Response to Chapman Comment #1: The comment describes the lifespan of native valley oak trees and the history of California's valley oak stands. Comment noted. The proposed project is subject to the City's Tree Preservation Ordinance (Section 19.66 of the Roseville Municipal Code). The staff report and Initial Study provide an analysis of tree impacts.

Response to Chapman Comment #2: The comment states that, based on the City's Riparian and Creeks Management Plan (2005) and a letter from the Foothill Valley Watershed Collaborative (in reference to another project), there should not be any protected trees removed from within 100 feet of Linda Creek. Neither of the documents cited in the comment contain a prohibition on removing protected trees that are within 100 feet of Linda Creek. It is understood that this comment is based on the following language found in the Roseville Creek and Riparian Management and Restoration Plan (RCRMRP) "*In areas where preservation of the 100-year floodplain results in a buffer of less than 100 feet on each stream bank for perennial streams, opportunities should be sought for preservation to increase the size of these buffers.*" This language is taken from Chapter 4 of the RCRMRP, titled *RESTORATION STRATEGIES & CONCEPTUAL IMPROVEMENT TECHNIQUES*, which provide a variety of restoration strategies for creeks and presents conceptual improvement techniques that may be used to implement these strategies. The RCRMRP states that: *The degree to which these strategies and techniques are implemented will depend on individual site conditions, specific goals of the restoration project, and commitments that may be made as part of a securing a consolidated permit for Plan implementation.* It's important to note that the language regarding a 100-foot buffer for streams is found within one of the aforementioned techniques related to vegetated buffers that can help to "*reduce the amount of pollutants and sediment in overland stormwater runoff and to provide some interior habitat for species that are intolerant of human activity*". There are approximately six (6) protected trees on the project site that are proposed for removal and are within 100 feet of Linda Creek. Based on the project design, the project will not result in any increase of untreated runoff to Linda Creek. The Initial Study concludes that based on the biological assessment, any impacts to species or habitat will be less than significant with the proposed mitigation measures.

Response to Chapman Comment #3: The comment references the Arborist Report and Tree Preservation Ordinance and makes comment on a different project. Comment noted.

Response to Chapman Comment #4: The comment refers to the City's General Plan and the Roseville Creek and Riparian Management and Restoration Plan (RCRMRP), specifically the following language: "*In areas where preservation of the 100-year floodplain results in a buffer of less than 100 feet on each stream bank for perennial streams, opportunities should be sought for preservation to increase the size of these buffers.*" This language is not found within the City's General Plan 2035. For a fuller response to this comment, see Response to Chapman Comment #2.