

Appendix A

Notice of Preparation and
NOP Comments



NOTICE OF PREPARATION

Date: June 21, 2024

To: State Clearinghouse
Responsible Agencies
Trustee Agencies
Interested Parties

Subject: Notice of Preparation of an Environmental Impact Report for the proposed Roseville Environmental Utilities Operations Center Project and Notice of Public Scoping Meeting

Project Title/File Number: Roseville Environmental Utilities Operations Center Project

NOP Comment Period: Written comments are due to the City’s Development Services – Planning Department no later than 5:00 p.m. on July 22, 2024.

Public Scoping Meeting: In accordance with Public Resources Code Section 21083.9, notice is hereby given that the City of Roseville will conduct a public scoping meeting on July 10, 2024, at 6:00 p.m. at the Martha Riley Library, 1501 Pleasant Grove Blvd., Roseville, CA, in Meeting Rooms 1 & 2 (unless noted otherwise at the facility).

Project Location: The project would be located on Phillip Road on 243 acres of undeveloped land along the northwest boundary of Roseville, in the City of Roseville, Placer County. The project site includes portions of Assessor’s Parcel Numbers (APNs) 017-010-033-000, 017-090-054-000, and 017-090-055-000.

Lead Agency and Contact Person: City of Roseville Development Services – Planning
Jessica Lynch, Environmental Coordinator
311 Vernon Street
Roseville, CA 95678
Phone: (916) 774-5352
Fax: (916) 774-5129
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Website:
<https://www.roseville.ca.us/cms/One.aspx?portalId=7964922&pageId=20335517>

1 INTRODUCTION

This notice of preparation (NOP) has been issued to notify interested parties that an environmental impact report (EIR) will be prepared and to solicit feedback on the scope and content of the analysis in the EIR. The City of Roseville will be the lead agency. It will prepare an EIR for the Roseville Environmental Utilities Operations Center Project, which includes the project approvals listed in Section 4 of this NOP. A description of the project and its vicinity and location maps are provided in this NOP.

NOP Comment Period: Due to the time limits mandated by state law, your response to this NOP must be sent at the earliest possible date and submitted to the City, but not later than 30 calendar days after June 21, 2024 (the date this notice was first posted). Please submit comments to the City of Roseville no later than 5 p.m. on July 22, 2024. Please provide written comments to:

City of Roseville Development Services – Planning
Jessica Lynch, Environmental Coordinator
311 Vernon Street
Roseville, CA 95678
Phone: (916) 774-5352; Fax: (916) 774-5129; Email: JLynch@roseville.ca.us

Public Scoping Meeting: A public scoping meeting will be held on July 10, 2024, to receive comments from interested parties regarding the issues that should be addressed in the EIR. The time and location of the public scoping meeting is provided on the first page of this NOP.

2 REGULATORY BACKGROUND

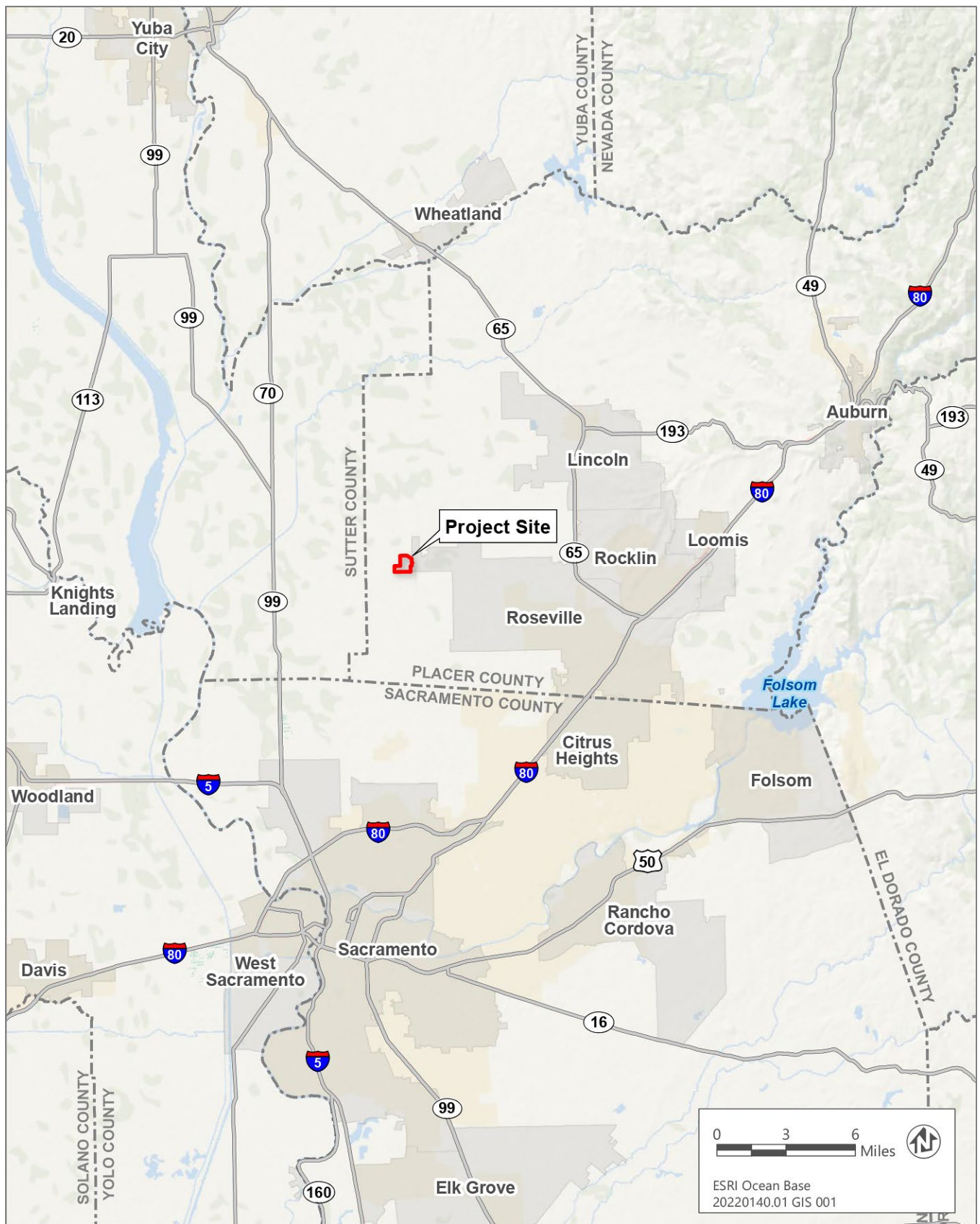
This NOP provides notification that an EIR will be prepared for the project and has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Division 13 Section 21000 et seq., and the State CEQA Guidelines, Title 14 California Code of Regulations Section 15000 et seq. According to the State CEQA Guidelines Section 15064, an EIR must be prepared if there is substantial evidence in light of the whole record that the proposed project may significantly affect the environment.

3 PROJECT DESCRIPTION

The City proposes to construct and operate a new Environmental Utilities Operations Center to address the City's projected demands for municipal services, State requirements to electrify the City's waste collection vehicles, and changing State law related to solid waste management. The project would provide a common location for the City's management of its waste, recycling, and organics materials; fleet charging; and various divisions of the City's Environmental Utilities (EU) department.

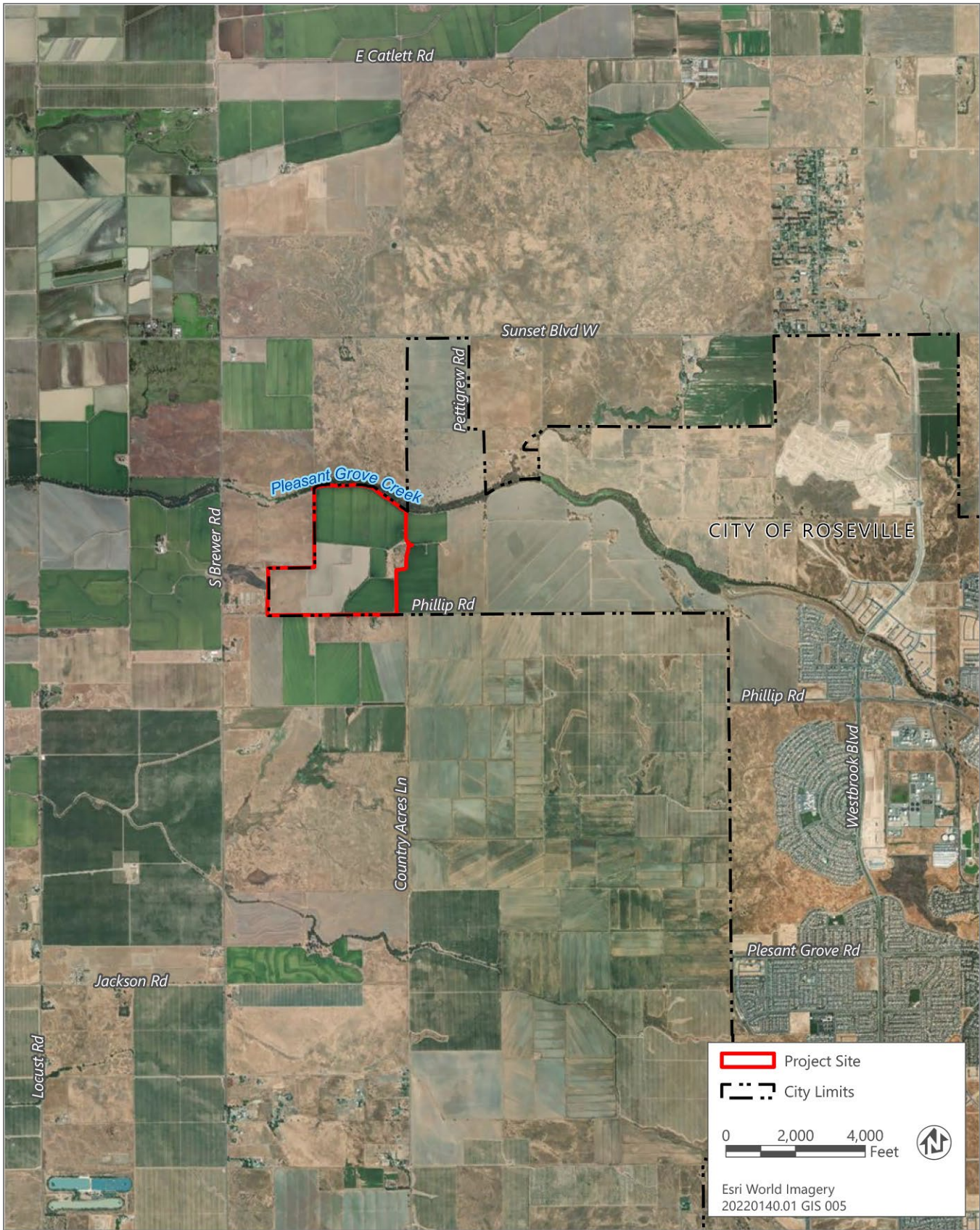
3.1 PROJECT LOCATION AND SETTING

The project would be located on Phillip Road (near its western terminus at South Brewer Road) on 243 acres of undeveloped land in the northwest limit line of the City of Roseville, Placer County. The project site (Figures 1 and 2), owned by the City, is currently largely agricultural and is leased for rice and hay farming. Several structures are located on the site, which are remnants from a past pheasant club and farm uses. These may be demolished prior to development.



Source: adapted by Ascent in 2024.

Figure 1 Regional Location



Source: adapted by Ascent in 2024.

Figure 2 Project Location

The total development area is currently anticipated to be less than the project site shown in Figure 2; however, the exact location of project components has yet to be finalized. For that reason, the City proposes to assess the entire project site in the event that project components may need to be relocated for design or avoidance purposes.

The project site includes portions of Assessor's Parcel Numbers (APNs) 017-010-033-000, 017-090-054-000, and 017-090-055-000. The existing General Plan land use designation for the project site is Public/Quasi-Public (P/QP), which establishes areas for municipal, governmental, or public facilities. The zoning for the project site is Planned Development (PD). A Planned Development district is a special purpose district that is intended to be applied in circumstances where the desired mix of uses cannot be achieved with a residential, commercial, or industrial mixed-use district when combined with a special area overlay. As a public facility, the project would be consistent with the Public/Quasi-Public land use designation. No General Plan amendments or zoning changes would be required.

The site is within an area of City-owned property known as the Warnick or Plunkette property, adjacent to Reason Farms. The Al Johnson Wildlife Area is located to the east of the site and is part of an area planned to accommodate the City's stormwater Regional Retention facility and potential recreation uses. Pleasant Grove Creek is located along the site's northern boundary. Other surrounding land uses include agriculture. The Creekview Specific Plan, West Roseville Specific Plan, and Amoruso Ranch Specific Plan areas are each located slightly more than 2 miles to the east and are in various stages of development and will include a total of approximately 13,630 residential units at buildout. The Phillip Road Site project is currently under consideration for development by Panettoni and is approximately 2 miles east of the site. The Phillip Road Site project has not been approved as of the date of this NOP.

3.2 PROJECT BACKGROUND AND NEED

CHANGES IN SOLID WASTE REGULATIONS

Changes in state law have transformed waste management in California. Unlike the prior regulations in the late 1980s (e.g., Assembly Bill 939) that required municipal managers to implement recycling programs), recent regulations have been adopted to address climate change. As such, these regulations have focused on reducing greenhouse gases associated with solid waste residues (i.e., Senate Bill [SB] 1383 Short Term Climate Pollutant – Organic Waste Methane Reduction Act).

SB 1383 requires local governments to divert a majority of organic wastes (e.g., food waste, green/yard waste, and food soiled paper) from landfills. The City is a member of the Western Placer Waste Management Authority (WPWMA) Joint Powers Authority and relies on WPWMA recycling and disposal services for all waste streams. The City has commitments in place to continue to utilize WPWMA's services. As a component of the City's study of a new Environmental Utilities Operations Center, the City will evaluate the location and operation of a materials recovery facility to assist in complying with state regulations for certain recoverable, recyclable, and marketable waste streams. The site will not be evaluated for disposal or landfilling operations.

LIMITATIONS OF EXISTING CORPORATION YARD

The City owns and operates a Corporation Yard of approximately 55 acres (located at 2005 Hilltop Circle in Roseville), which supports the needs of the City's Environmental Utilities Department, it also includes the following departments: Electric, Public Works, Parks, Fire, and Police. The Hilltop Circle Corporation Yard is constrained by existing development on all sides, which limits its ability to continue to serve all of its current tenants through increased demand for City services, changing regulations, and any other planning considerations that may arise.

In February 2020, the City prepared a site evaluation to evaluate the possibility of relocating City services from the current Corporation Yard to another location to accommodate the growing needs of various City divisions. A

larger Corporation Yard would prepare the City for compliance with the State’s Advanced Clean Fleet regulations, which require the City to electrify much of the fleet, including waste collection vehicles. Additional storage space offered by a larger Corporation Yard would also prepare the City to respond to maintenance and repair efforts as the City infrastructure ages.

The project site is considered an opportunity for the consolidation of Citywide operations (including those of the EU) in a manner that is least impactful to City residents. The parcels encompassing the project site are large enough to allow the City to create buffer space around the City operations in contrast to other locations previously considered.

PROJECT SITE HISTORY

The City purchased the Warnick/Plunkette property and Reason Farms, a combined 1,700 acres in approximately 2003 for a stormwater retention basin project. The retention basin project was originally known as the Reason Farms Retention Basin Facility and later renamed the Pleasant Grove Retention Facility. The City is the project proponent for the facility, which is already designed and approved but not yet constructed. The EIR (State Clearinghouse #2002072084) for the retention facility was certified in 2003 and is planned to be updated in the near term. The EU Operations Center project site is located in an area no longer needed for the retention basin project (which, as noted above, would be located within the 1,500-acre Al Johnson Wildlife Area [formerly part of Reason Farms] to the east of the project site). The City has identified this property for development for over a decade.

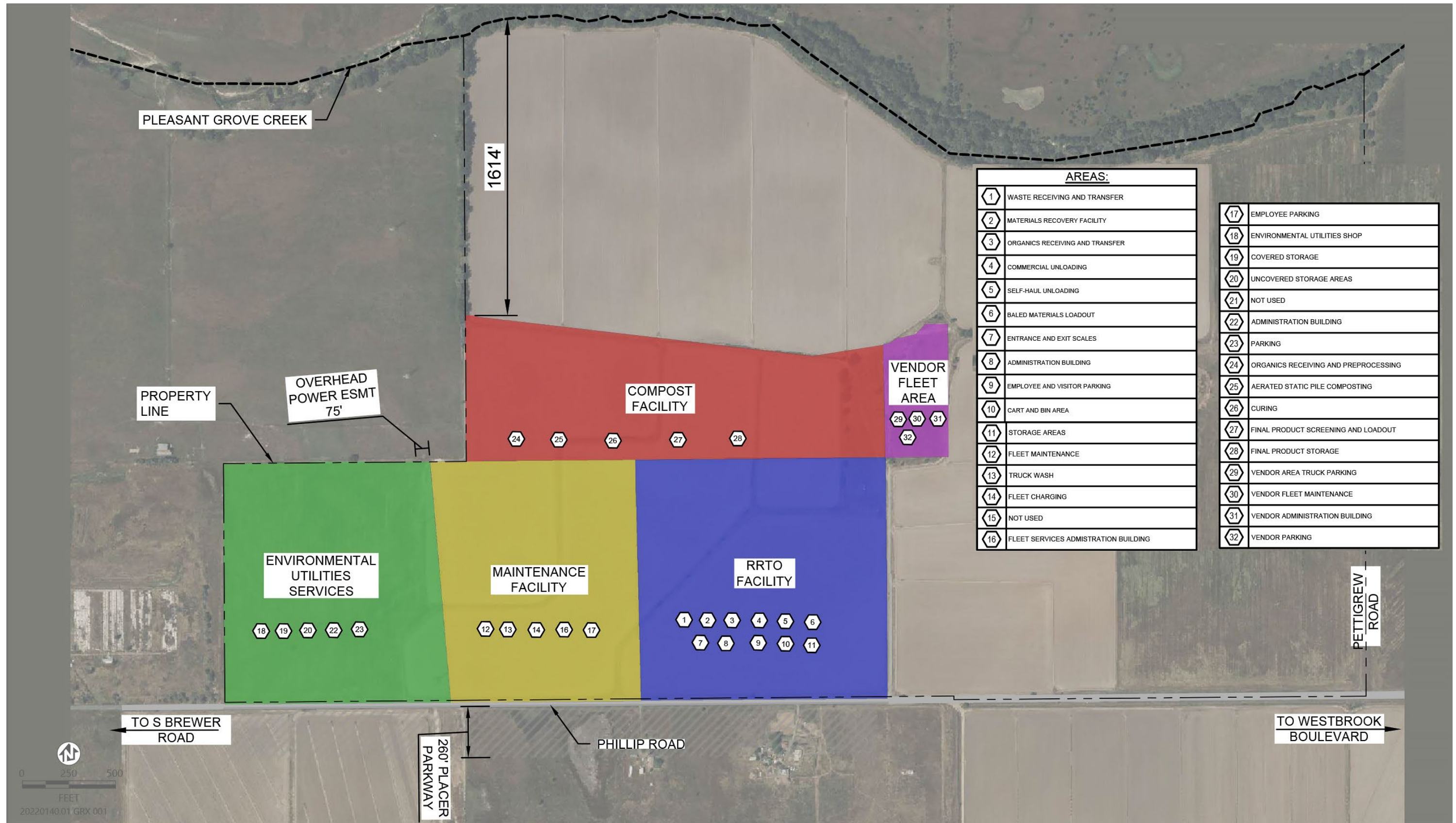
3.3 PROJECT OBJECTIVES

The City has developed the following objectives for the project:

- ▲ consolidate multiple EU divisions at a single location to allow for greater operational efficiencies;
- ▲ provide a shared location for the management of waste, recycling, and organic material generated by land uses within the City’s jurisdiction with capacity to serve areas outside the City’s jurisdiction;
- ▲ provides the option to implement a three-cart set out, thereby meeting the organics and recycling diversion requirements by statute (SB 1383);
- ▲ limit potential odors associated with recycling and composting by maintaining an appropriate distance from nearby residential and other sensitive uses;
- ▲ provide a secondary corporation yard to serve the City’s long-term needs and allow for the consolidation of divisions with associated efficiencies;
- ▲ address sustainability issues related to waste generation;
- ▲ allow for City services to increase and respond to projected demands for solid waste services and changing regulations; and
- ▲ minimize environmental impacts to surrounding areas, including residential communities and other sensitive land uses.

3.4 PROJECT COMPONENTS

The project includes two primary components: a Corporation Yard that would house various EU divisions relocated from the existing Corporation Yard on Hilltop Drive and a Resource Recovery and Transfer Operations (RRTO) facility to manage the City’s waste, recycling, and organics materials. These facilities are described below. Figure 3 provides general locations within the project site for EU division operations, and RRTO facility needs.



Source: Image produced and provided by HDR, adapted by Ascent in 2024.

Figure 3 Proposed Services/Facilities Areas within Project Site

RESOURCE RECOVERY AND TRANSFER OPERATIONS FACILITY

The RRTO Facility is expected to encompass three major functions defined by the type of material being handled: a Materials Recovery Facility (MRF) for processing recyclables; a transfer facility for consolidating municipal solid waste (MSW) unloaded from collection vehicles and reloading onto transfer trucks for final disposal destinations; and an organics receiving, depackaging, and transfer component that will either process or transfer source separated organic materials.

Table 1 presents the estimated materials that would be handled annually at the RRTO Facility. For each key milestone year, a high and low tonnage range was determined for each material type. The low range assumes a 2 percent growth rate of all materials, and the high range assumes a 2.5 percent growth rate.

Table 1. RRTO Facility Estimated Range of Annual Materials Quantities

Year	Recyclables (tons)	Organics (tons)	MSW Transfer (tons)	Total Facility Throughput (tons)
2028	80,000 – 100,000	49,000 – 64,000	82,000 – 102,000	211,000 – 266,000
2044	110,000 – 148,000	82,000 – 111,000	200,000 – 248,000	392,000 – 507,000
2058	146,000 – 210,000	108,000 – 156,000	265,000 – 350,000	519,000 – 716,000

Notes: MSW = municipal solid waste.

Source: Data provided by City of Roseville in 2024.

ENVIRONMENTAL UTILITIES OPERATIONS FACILITY CORPORATION YARD

The City anticipates outgrowing the current Corporation Yard (located at 2005 Hilltop Circle in Roseville). It intends to relocate some of its divisions to the new EU Operations Facility Corporation Yard on the project site. Roseville Electric and Roseville Fire Department operate training centers at the existing Corporation Yard and are expected to remain for the foreseeable future. It is not known at this time if the City will move other employees or operations to that facility. The various EU divisions that are being considered for relocation and consolidation to the new Corporation Yard location are:

- ▲ Administration: provides leadership and support services for the utilities, ensuring coordination within the department. This includes managing business services such as utility rate development, budgeting, accounting, and reporting, along with public information. They also co-manage the Utility Exploration Center with Roseville Electric.
- ▲ Business Services and Management: Manages the division’s budget and utility rates, performs special studies, and co-manages the Utility Exploration Center with Roseville Electric.
- ▲ Technical Services: Manages special projects and programs, including division-wide engineering, capital improvement projects, long-range planning, plan review, inspections, mapping and cataloging of existing and new City utility infrastructure, drafting, and managing mapping and modeling program software, responding to public record act requests, enterprise asset management programming and rehabilitation planning, and division safety programs.
- ▲ EU Equipment Maintenance: Responsible for the maintenance and upkeep of equipment used by the divisions specific to EU located at the Corporation Yard.
- ▲ Refuse and Stormwater Utility: Provides residential and commercial refuse service and recycling programs and oversees the City’s stormwater quality program.
- ▲ Water Utility: Provides surface and groundwater supply, water treatment, distribution, and water efficiency services. The division also oversees legislative and regulatory issues for the utilities.

BUILDING SIZING AND SITE ACREAGE

The RRTO Facility and Corporation Yard would be sized to accommodate multiple phases of project development (Tables 2 and 3). The initial design includes one large multipurpose building, approximately 200,000 square feet (sq ft), that would serve all three waste streams (recyclables, MSW, and organics). The building would be designed such that it could be expanded in future phases to accommodate increasing amounts of recyclables, MSW, and organics.

A permanent administration office would be constructed in a later project phase. In the interim, the City may install a temporary/portable building on the project site to serve as temporary administrative office space.

The MRF would include an eleven-acre portion of the site for use as a “for lease” fleet parking area for private haulers in the region. This area is intended to provide private haulers who could commit to delivering recyclables, waste, or organics to the facility for their fleet collection or transfer vehicles to park/be fueled and serviced.

Table 2. Proposed Building Sizing

Project Component	Estimated Building Area (Design Year)	Building Area for Initial Phase of Development
RRTO Facility: Materials Recovery Facility	100,000 sq ft (2028) 151,000 sq ft (2044) 178,000 sq ft (2058)	One, 200,000-sq-ft building to serve as receiving for recyclables, MSW, and organics. Facility to be expandable on both ends and including the following: <ul style="list-style-type: none"> ▶ 120,000 sq ft: Discrete areas for surge management for the receipt of organics, MSW, and recyclables, as well as two top-load transfer chutes ▶ 50,000 sq ft: Single-stream MRF processing line operating a double shift (420 tons per day throughput) ▶ 30,000 sq ft: Baled materials area
RRTO Facility: Transfer Facility	43,000 sq ft (2028) 103,000 sq ft (2044) 142,000 sq ft (2058)	
RRTO Facility: Organics Facility	20,000 sq ft (2028) 30,000 sq ft (2044) 38,000 sq ft (2058)	
Corporation Yard	192,400 sq ft (2058)	None
Total	550,400 sq ft (2058)	200,000 sq ft (2028)

Notes: MRF = Materials Recovery Facility; MSW = municipal solid waste; RRTO = Resource Recovery and Transfer Operations; sq ft = square feet. Source: Data provided by City of Roseville in 2024.

Table 3. Proposed Site Acreage

Project Component	Estimated Acreage (Design Year)	Acreage for Initial Phase of Development
RRTO Facility: Materials Recovery Facility	10 acres (2028) 15 acres (2044) 17 acres (2058)	50 acres
RRTO Facility: Transfer Facility	4 acres (2028) 9 acres (2044) 13 acres (2058)	
RRTO Admin, Employee Parking	10 acres (2058)	
Storage of Empty Bins for the Waste Services Division	5 acres (2058)	
Vendor Fleet Parking and Service Area	11 acres (2028)	11 acres
RRTO Facility: Organics Facility	14 acres (2028) 21 acres (2044) 30 acres (2058)	Not included in Phase 1
Corporate Equipment Maintenance Services, Maintenance, Charging, Fueling	30 acres (2058)	Not included in Phase 1

Project Component	Estimated Acreage (Design Year)	Acreage for Initial Phase of Development
Corporation Yard	40 acres (2058)	Not included in Phase 1
Total	150 acres (2058)	61 acres (2028)

Notes: MRF = Materials Recovery Facility; RRTO = Resource Recovery and Transfer Operations.
Source: Data provided by City of Roseville in 2024.

Landscape setbacks would be provided around the perimeter of the site as a buffer along Phillip Road and Pleasant Grove Creek. Water-efficient landscaping would be installed throughout the site in compliance with the City of Roseville Water Efficient Landscape Ordinance (WELO).

The main entry to the project site would be from Phillip Road. It would include a public driveway and an internal vehicular circulation system providing access to a surface parking lot. Sufficient parking would be provided for operational vehicles (heavy and light duty), staff, and members of the public. Security systems would include gates, controlled access, and cameras.

UTILITIES

Utility service is not currently available at the project site except for limited data and electric. Thus, the project will require the extension of nearby water, wastewater, stormwater, and electrical infrastructure to serve the future development of the site.

WATER SUPPLY

The project would require potable and non-potable water. Potable water would be used for sink faucets, showers, water fountains, toilets, and dust control (misting/aerosol). Non-potable water would be used for street sweeping, recirculation cooling and heating system, fire sprinklers, utility and industry (e.g., compost watering, vehicle wash, fire flow), and landscape irrigation. Potable and non-potable water demands will be evaluated for both the initial phase of development in 2028 and final buildout in 2058 in the EIR.

With respect to fire flow, the non-potable water supplies would be used to address potential fire suppression needs and are estimated to be approximately 960,000 gallons based on the California Fire Code, as amended by the City of Roseville. Based on this and assuming the provision of an onsite fire water storage tank, the maximum allowable recharge time for a fire water storage tank is 8 hours, which would require production sources totaling a minimum of 2,000 gallons per minute (GPM), with backup power generation for the production sources. Alternatively, the project site could meet City requirements with an onsite storage pond that retains more than 200 percent of the required fire flow. For this analysis and as part of the project, both options will be considered part of the project.

WASTEWATER

The project would connect to the City’s wastewater collection and treatment system. The City will evaluate both average and peak wastewater demands for both initial and final buildout of the project in the EIR. Demands on the City’s wastewater infrastructure, including treatment, will specifically be evaluated.

ELECTRICITY

The total electrical demand for the initial phase of the project (RRTO with one MRF processing line) is estimated to be 5 megawatts (MW), with an estimated utility service size of 5 megavolt ampere (MVA). Additional project phases, including a second MRF processing equipment line, a Corporation Yard, electric vehicle (EV) chargers, and an administration building, would substantially increase the power demand. The total estimated electrical

demands of the RRTO building with two MRF lines, Corporation Yard, and EV Fleet Charging would be approximately 17 MW. The estimated buildout with contingency capacity for planning purposes would be approximately 18 MVA. The project site plan reserves an acre of land for an electric substation.

Standby generation is anticipated to be needed to provide backup power to selected loads. Generator sizes and locations will be determined during detailed design. Automatic transfer switches would be installed to control the generators.

OFF-SITE IMPROVEMENTS

Off-site improvements would include improvements to Phillip Road for approximately 2.5 miles. Phillip Road would be constructed as an Industrial/Collector Street containing two drive lanes with curb and gutter. A detached sidewalk would be constructed along the north side of the road only because the south side of the road right of way is in Placer County jurisdiction. Additionally, off-site improvements would include extending water, wastewater, stormwater, and electrical infrastructure to the site, as described above.

It is assumed that Phillip Road, between Westbrook Boulevard and the northerly segment of Phillip Road, would be improved as part of the Phillip Road Site Project (formerly, Roseville Industrial Project). However, because that project is discretionary and on its own timing, this project also includes the improvements to this section of roadway.

PROJECT PHASING

The project would be developed in phases over the next 30 years, beginning with the development of the RRTO facility, estimated to open in 2028 (Table 4). Subsequent phased expansions of the RRTO and the Corporation Yard may be developed on an as-needed basis, with ultimate buildout expected in 2058.

Table 4. Proposed Phasing Plan

Phase	Components	Construction	Operation
1	<ul style="list-style-type: none"> ▶ RRTO building and functions including City/commercial hauler waste transfer, organics transfer, materials recovery, loadout, and recyclables loadout ▶ Waste and recycling administration and support office ▶ Entrance/exit scale plaza ▶ Employee and visitor parking ▶ Waste and recycling fleet parking 	late 2025 through mid-2028	2028
2	<ul style="list-style-type: none"> ▶ RRTO building expansion to add self-haul waste transfer and expansion or addition of a second materials recovery, loadout, and recyclables loadout ▶ Expansion of the waste and recycling administration and support office ▶ Expansion of the entrance/exit scale plaza ▶ Expansion of the employee parking ▶ Expansion of waste and recycling fleet parking 	2040 through 2043	2044
3	<p>Maintenance Facility</p> <ul style="list-style-type: none"> ▶ Maintenance building ▶ Truck wash facility ▶ Fueling facility ▶ Charging facility ▶ Maintenance administration building ▶ Employee parking <p>EU Corporation Yard</p> <ul style="list-style-type: none"> ▶ Environmental utilities shops ▶ Covered storage ▶ Uncovered storage areas ▶ Administration building ▶ Employee and visitor parking <p>Leased Parking Area</p> <ul style="list-style-type: none"> ▶ Lessee area truck parking ▶ Lessee fleet maintenance ▶ Lessee administration building ▶ Lessee parking 	May be constructed on an as needed basis	As needed
4	<p>Organics Processing Area (if determined to be necessary to meet the City's needs)</p> <ul style="list-style-type: none"> ▶ Organics receiving and preprocessing ▶ Aeriated static pile composting ▶ Curing ▶ Final product screening and loadout ▶ Final product storage ▶ Possible biomass facility 	By 2058*	

Notes: EU = Environmental Utilities; RRTO = Resource Recovery and Transfer Operations.

* For transparency, this EIR notes a section of the site that could potentially be used for composting and/or a biomass facility. but the City cannot speculate when or if this facility will be needed or determine with sufficient clarity what the impacts may be. While organics transferring (unloading from smaller trucks and loading into larger trucks to facilitate hauling material offsite for processing) is part of the proposed project, the City will prepare a separate environmental document prior to building an organics processing system such as composting and/or a biomass facility when those details are available.

Source: Data provided by City of Roseville in 2024.

CONSTRUCTION ACTIVITIES

Construction hours would be 7:00 a.m. to 7:00 p.m. Monday through Friday. Construction could also occur from 8:00 a.m. to 8:00 p.m. on Saturdays and Sundays on an as-needed basis. Additionally, nighttime construction would likely be required for large concrete pours, on an as-needed basis, starting as early as 11:00 p.m. and continuing through the following day. Per the City's noise ordinance, all construction equipment would be fitted with factory installed muffling devices and all construction equipment will be maintained in good working order.

As noted above, construction would be conducted over multiple phases of development. For any given phase, there would be a range of 40-60 construction workers for a given shift. Access during construction would be from Phillip Road.

PROJECT OPERATION

At full buildout in 2058, it is assumed that there would be a total of 489 employees for the RRTO Facility and Corporation Yard (Table 4). The City anticipates that 165 existing employees from the current Corporation Yard would be relocated to the new Corporation Yard location, and an additional 221 employees would be added over the next three decades, for a total of 386 employees by 2058.

Table 4. Anticipated Staffing

Year	RRTO Facility Staff	Corporation Yard Staff	Total Staff
2028	48	0	48
2058	103	386	489

Notes: RRTO = Resource Recovery and Transfer Operations.
Source: Data provided by City of Roseville in 2024.

Typical operational hours would be 5 a.m. to 10 p.m., with the majority of staff working from 7 a.m. to 7 p.m. Some facilities would need to operate 24 hours per day.

4 PROJECT APPROVALS

Elements of the project could be subject to permitting and/or approval authority of other agencies. As the lead agency pursuant to CEQA, the City is responsible for considering the adequacy of the EIR and determining if the project should be approved. The City will be the permitting agency for the project with regards to the building permits. Other potential permits required from other agencies could include:

Federal

- ▲ Federal Emergency Management Agency: Letter of Map Revision.
- ▲ US Army Corps of Engineers: Compliance with Section 404 of the Clean Water Act if fill would be discharged to Waters of the US.
- ▲ US Environmental Protection Agency: Concurrence with Clean Water Act Section 404 permit.

State

- ▲ California Department of Fish and Wildlife, Region 2: Section 1602 streambed alteration agreement if any construction activities occur within the bed or bank of adjacent waterways.
- ▲ California Department of Resources Recycling and Recovery: Solid Waste Facility Permit.
- ▲ Central Valley Regional Water Quality Control Board: National Pollutant Discharge Elimination System construction stormwater permit (Notice of Intent to proceed under General Construction Permit) for disturbance of more than 1 acre, discharge permit for stormwater, and Clean Water Act Section 401 water quality certification or waste discharge requirements.

Local

- ▲ Placer County Air Pollution Control District: Authority to Construct/Permit to Operate, and Air Quality Management Plan consistency determination.

5 PROBABLE ENVIRONMENTAL EFFECTS AND SCOPE OF THE EIR

The EIR will describe the significant direct and indirect environmental impacts of the project. The EIR will also evaluate the cumulative impacts of the project, defined as impacts that could be exacerbated when considered in conjunction with other related past, present, and reasonably foreseeable future projects (as explained in Section 7 below of this NOP). The City anticipates that the project could potentially result in significant environmental impacts in the following resource areas, which will be further evaluated in the EIR:

- ▲ Aesthetics and Visual Resources
- ▲ Land Use Planning and Agricultural Resources
- ▲ Air Quality
- ▲ Greenhouse Gas Emissions
- ▲ Biological Resources
- ▲ Cultural Resources
- ▲ Tribal Cultural Resources
- ▲ Energy
- ▲ Geology and Soils
- ▲ Hazards and Hazardous Materials
- ▲ Hydrology and Water Quality
- ▲ Noise and Vibration
- ▲ Population, Employment, and Housing
- ▲ Public Services
- ▲ Public Utilities
- ▲ Transportation and Circulation
- ▲ Wildfire

These potential impacts will be assessed and discussed in detail in the EIR, and feasible and practicable mitigation measures will be recommended to reduce any identified significant or potentially significant impacts.

The City anticipates that the project will not result in significant environmental impacts in the following resource areas, which will not be further evaluated in the EIR: mineral resources and recreation. The EIR will briefly explain why significant impacts to these resources are not anticipated.

6 ALTERNATIVES ANALYSIS

As required by CEQA, the EIR will evaluate alternatives to the project. As stated in the State CEQA Guidelines Section 15126.6(c), the primary intent of the alternatives evaluation in an EIR is to evaluate a range of alternatives to the project that “could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA also requires that the project alternatives analysis include consideration of the “no project” alternative.

7 CUMULATIVE IMPACTS ANALYSIS

As required by CEQA, the EIR will evaluate the cumulative impacts of the project. As stated in State CEQA Guidelines Section 15065(a)(3), projects should be evaluated to determine whether the project’s impacts are “cumulatively considerable,” which means that the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”



Shanti Landon, Placer County, Chair

Scott Alvord, City of Roseville

Bonnie Gore, Placer County

Bill Halldin, City of Rocklin

Holly Andreatta, City of Lincoln

Scott Scholz, General Manager

July 17, 2024

Jessica Lynch, Environmental Coordinator
City of Roseville Development Services – Planning
311 Vernon Street
Roseville, CA 95678

Sent via email: JJLynch@roseville.ca.gov

**RE: ROSEVILLE ENVIRONMENTAL UTILITIES OPERATIONS CENTER PROJECT
NOTICE OF PREPARATION**

Dear Ms. Lynch:

The Western Placer Waste Management Authority (WPWMA) appreciates the opportunity to review and provide comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Roseville Environmental Utilities Operations Center Project (Project).

The WPWMA is a regional agency established in 1978 by the County of Placer and the cities of Roseville, Rocklin and Lincoln (Member Agencies) governed by a Board of Directors comprised of elected officials from each of the Member Agencies. The WPWMA provides recycling and waste disposal services to those communities as well as the cities of Auburn and Colfax and the Town of Loomis. The WPWMA also provides these services to individuals, business entities and other governmental agencies in and around Placer County.

The WPWMA's nearly 1,000-acre campus, located at the intersection of Athens Avenue and Fiddymont Road immediately north of the City of Roseville, provides a conveniently located, comprehensive solid waste management system that includes a materials recovery facility (MRF), organics composting facility, residential and commercial recycling drop-off and buy-back center, permanent household hazardous waste collection facility, and the only remaining active sanitary landfill in Placer County. The WPWMA's systems were designed and are operated to ensure that Placer County's municipalities, businesses and residents are able to comply with state and federal solid waste management laws and regulations in a cost effective and sustainable manner.

In an effort to proactively plan for continued regional growth, changes in solid waste and climate-related regulations, and ever-increasing volatility in foreign and domestic recyclable commodity markets, the WPWMA prepared and its Board of Directors unanimously certified the Renewable Placer Waste Action Plan Environmental Impact Report (EIR) in December 2022. The EIR represented the culmination of 6 years of planning and research to identify the most sustainable, cost-effective approach focused on developing a local circular economy and ensuring long-term, locally controlled solid

Western Placer Waste Management Authority

3013 Fiddymont Road, Roseville CA 95747 | (916) 543-3960 | wpwma.ca.gov

waste management capacity and continued regulatory compliance to support the Member Agencies' solid waste and recycling needs for at least the next 100 years.

The initial phase of Waste Action Plan includes the \$120 million renovation of the WPWMA's MRF and composting facilities to comply with SB 1383 organic materials diversion requirements and manage waste streams regardless of collection method; the new MRF will be capable of processing both mixed (black bin) and source-separated (blue bin) materials for recovery of recyclable materials.

In September 2022, the WPWMA Board unanimously approved the issuance of public revenue bonds to fund these critical facility improvements. The WPWMA's upgraded facilities, scheduled to be operational in 2025, will meet or exceed the SB 1383 organic materials diversion mandates and nearly triple diversion rates, further demonstrating the WPWMA's and Member Agencies' continued commitment to sustainability.

The WPWMA has also reserved space on its campus to foster development of a local circular economy by facilitating compatible technologies and manufacturing to utilize materials recovered at the WPWMA's MRF. This pivotal action is intended to create and support a vibrant and sustainable local recyclables market, reduce the environmental impacts associated with long-distance transport of materials to foreign and domestic markets, and create local jobs helping to enhance the region's economy.

Based on information provided in the NOP related to Roseville's proposed Resource Recovery and Transfer Operations (RRTO) and composting facilities that appear to be similar in operation and intent to the WPWMA's facilities, the WPWMA requests the City of Roseville include a comprehensive evaluation of all potentially consequential environmental and economic impacts of the proposed Project on the existing regional solid waste management system. The analysis should include at least the following resource areas associated with additional vehicle traffic necessary to transport materials to the Project site, recovered materials bound for various end markets, and residual wastes requiring disposal at a sanitary landfill: 1) Greenhouse Gas Emissions, 2) Transportation/Traffic, 3) Hazards & Hazardous Materials, and 4) Air Quality.

The WPWMA looks forward to engaging with the City of Roseville as it evaluates its proposed Project to ensure the long-term viability of the WPWMA's facilities and operations in order to continue providing valuable public services to the WPWMA's customers, including the City of Roseville.

Sincerely,



Scott Scholz
General Manager

CC: WPWMA BOARD OF DIRECTORS



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COUNTY EXECUTIVE**
Daniel Chatigny, County Executive Officer

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July 22, 2024

Jessica Lynch, Environmental Coordinator
City of Roseville Development Services - Planning
311 Vernon Street
Roseville, CA 95678

via email: JLynch@roseville.ca.us

Subject: Roseville Environmental Utilities Operations Center Project, Notice of Preparation

Dear Ms. Lynch:

Placer County received the Notice of Preparation (NOP) of the Environmental Impact Report (EIR) for the Roseville Environmental Utilities Operation Center Project (Project). We appreciate the opportunity to engage at this stage in the process. The NOP indicates the City is proposing the Project to meet its projected demands for solid waste management over the next thirty-plus years, as well as to improve fleet charging and various administrative functions.

The waste management portion of the Project represents a significant new development in both size and scale, and is surrounded on three sides by unincorporated County properties where many of the impacts of that type of facility will be felt. The waste management portion also appears to provide services already offered by the nearby Western Placer Waste Management Authority's (WPWMA's) regional material recovery facility (MRF). The Project is also located in close proximity to the Pleasant Grove Creek, which provides beneficial ecological habitat, and is located directly south of property anticipated for conservation through the Placer County Conservation Program (PCCP). The topics identified are explained in more detail below.

Land Use Compatibility

While the NOP includes information to describe the Project setting and its relationship to other major land uses within the City of Roseville such as the West Roseville Specific Plan and the Sierra Vista Specific Plan, the NOP does not address the land use setting to existing, approved, and planned future land uses within unincorporated Placer County that are within the immediate vicinity of the Project and will be directly impacted by the Project.

The EIR should include a full evaluation of Project impacts on existing and planned rural, agricultural and urban land uses within unincorporated Placer County. This evaluation should address the Regional University Specific Plan located one-half mile south of the Project boundary, the Placer Ranch Specific Plan and Sunset Area Plan located two miles east of the Project boundary, and the Future Study Area incorporated into Placer County General Plan, Part III, also known as the Curry Creek Community Plan Area, which immediately abuts the Project boundary on the south and west. Additionally, the EIR should consider the potential impacts on nearby rural and agricultural land uses, and on the Mourier West property, located immediately north of the Property and proposed for conservation through the PCCP.

Placer County is concerned that the characteristics of the proposed Project would result in substantial impacts to these existing and future growth areas in a manner that would significantly impair their desirability and/or buildout. Accordingly, the County requests that the EIR include a comprehensive evaluation of potential impacts to these nearby land uses.

Due to the unique location and adjacency to unincorporated Placer County lands already slated for use/development, the EIR land use section should include an evaluation of compatibility in accordance with Placer County General Plan policy structure (in addition to evaluation of compatibility with the City's General Plan), especially pertaining to establishment of new land uses that may generate objectionable odors.

Land use issues that should be addressed in the EIR include:

1. Proximity to Regional University Specific Plan and Placer Ranch Specific Plan
2. Proximity to Future Study Area / Curry Creek
3. Compatibility with adjacent farm uses
4. Land Use buffering impacts to PCCP and agriculture

Aesthetics

The EIR should include an analysis of:

1. Aesthetic impacts to adjacent properties and to other properties within the County with views of the site.
2. Litter impacts including mitigation developed to prevent litter along routes to, and from, the facility as well as to prevent litter from leaving the site and/or collecting at Property boundaries or viewpoints.
3. Light generated by traffic and/or facility operations that might impact adjacent or nearby properties including current or future uses.
4. Aesthetic impacts due to light or what may otherwise be caused by 24-hour operations.

Air Quality

The EIR should include consideration of air quality, dust and odor impacts and establish mitigation to ensure that development potential and future uses on adjacent and nearby unincorporated County parcels are not compromised or otherwise negatively affected by the proposed Project. The Regional University Specific Plan property identifies many planned residential and outdoor use components, and is in short proximity to the proposed facility, as are other developments in the planning process. The EIR should:

1. Analyze air quality, dust and odor related to organics consolidation, de-packaging, processing, duration of time material is kept onsite, and storage method prior to hauling to a final location.
2. Analyze potential air quality and odor impacts along transportation corridors from the facility to a final compost location(s).
3. Analyze potential air quality and odor impacts to adjacent and nearby properties as related to onsite composting.
4. Analyze dust impacts generated by Project construction and operation, including those that may be generated from onsite traffic and parking or from Resource Recovery and Transfer Operations (RRTO) facility activities.
5. Analyze health impacts to County residents of air quality and odor impacts caused by the Project.

Greenhouse Gas Emissions

The EIR should contain a comprehensive greenhouse gas emission (GHG) evaluation that includes the following:

1. Emissions generated by moving multiple City divisions to a location at the edge of the City versus utilizing a central location to more efficiently serve the City as a whole.

2. GHGs generated by solid waste collection vehicles as needed to transport all RRTO material to and from the site for final disposal or processing elsewhere, as follows:
 - a. GHGs generated to transport residual waste to the proposed facility for processing, and from the facility for final disposal, whether to WPWMA for landfilling, or to a location(s) outside of the County.
3. GHGs generated to transport organic waste:
 - a. to the facility and from the facility for composting elsewhere; and
 - b. as would reasonably be expected for an onsite compost sales operation.
4. GHGs generated to transport recyclables to the site and transport recovered materials to end markets.
5. GHG emissions generated by onsite RRTO processing operations.

Hydrology & Water Quality

The EIR should evaluate the potential to violate any water quality standards during construction or operation due to handling and storage of materials including but not limited to waste, vehicles, equipment, and organic waste.

Noise

The EIR should include consideration of noise impacts to County properties to demonstrate that development potential and future uses on adjacent and nearby unincorporated parcels are not compromised. The size and scale of the proposed operation, potential traffic generation, including the type of traffic generated with large solid waste collection vehicles, the RRTO facility equipment, the placement of operations at or near property lines, and the extended hours of operation can all contribute to noise impacts. The EIR should also include analysis of noise impacts to existing and potential surrounding sensitive receptors. Noise impacts, including daytime and nighttime, and for construction and ongoing operations, should be evaluated in accordance with Placer County Code, Article 9.36 (Noise ordinance) given the proximity to unincorporated County property.

Public Services & Utilities

The proposed Project will alter waste management activities and waste flows in Placer County and Roseville, and to WPWMA facility, which currently provides this essential service to the region. The proposed Project is sized to serve not only all of the City's waste, but the areas outside of the City's jurisdiction as well. For reference, the first phase of construction is proposed to accommodate up to 266,000 tons of material. Ultimate buildout is proposed to accommodate up to over 700,000 tons. Currently, WPWMA receives approximately 500,000 tons per year from Placer County jurisdictions. The City of Roseville's waste makes up approximately 40 percent of this, on average, or approximately 200,000 tons annually. In addition, WPWMA's Materials Recovery Facility (MRF) permitted capacity is nearly 700,000 tons per year, less than the proposed Project's capacity at final phase. Accordingly, the proposed Project could potentially be of similar scope and size to the existing WPWMA MRF, though without a landfill component, and the Project's capacity would substantially exceed regional projected growth needs. It is safe to expect that the Project will divert flows away from the WPWMA facility.

The EIR should clearly describe the types and volumes of materials that will be directed to the proposed facility, the timing and phasing of the project, and the areas from which waste flows will be generated. The EIR should include an economic analysis of the reasonably foreseeable effects of having two facilities providing the same service for the same region in close proximity as well as potential resultant environmental effects.

The NOP also includes plans for a potential future compost operation and/or a biomass facility but proposes to analyze impacts in a future EIR. To ensure all potential impacts are adequately addressed, the EIR should analyze all potential impacts both with and without compost operation scenarios, because those proposed operations are not too speculative for analysis.

The EIR should also demonstrate that public services are in close enough proximity to respond to emergency calls and that they have sufficient capacity to respond in a timely manner to effectively handle emergencies as may be expected by a facility that includes handling and storage of hazardous and/or flammable materials.

Placer County Conservation Program

The EIR should include analyses of the direct and indirect effects of the Project on the fourteen special-status species that may occupy the Project site, as well as the wetlands, waters and streams, including Pleasant Grove Creek and the Mourier West Property, which are in close proximity to the Project Site. The EIR should also analyze whether the project is consistent with the PCCP.

Transportation/Circulation

1. The proposed Project is in the vicinity of the approved alignment of the Placer Parkway plan line. The EIR should include an exhibit of the approved plan line for Placer Parkway in relation to the proposed Project. The EIR should also include a discussion of Placer Parkway and identify any impacts that the Project may have on/to the approved Placer Parkway plan line. If the Project site area is located within any portion of the plan line area, then highway easements should be dedicated over that portion of the plan line and no Project improvements should be included within the plan line area.
2. Due to the location of the Project at the County boundary, the EIR should consider all potential impacts to County roadways. Along with traffic impact analysis and mitigation related to operation of the site for multiple City divisions, the EIR should include those associated with solid waste collection vehicles needed to bring all RRTO material to and from the site for final disposal or processing elsewhere. Specifically, discussion and analysis should consider traffic impacts due to:
 - a. Solid waste transport to the proposed facility for processing; and transport of residual waste to a final destination for landfilling.
 - b. Transport of organic waste to the facility and from the facility for composting elsewhere, and as would reasonably be expected from a compost sales operation onsite.
 - c. Transport of recyclables to the site; and transport of recovered material from the site to markets.
3. The County requests a transportation study that identifies any impacts or effects to County roadways and intersections. Please contact Phil Vassion at 530-745-7581 to discuss the scope of work for this effort.
4. South Brewer Road and a portion of Phillip Road near South Brewer Road are County maintained roadways. The EIR should clearly identify if construction traffic will use these County roadways. If construction traffic has the potential to use these roadways, then impacts to the existing roadway surfacing may occur. A discussion of the existing surfacing condition of South Brewer Road and the County portion of Phillip Road and any Project impacts to the surfacing should be included in the EIR. A mitigation measure should be included to provide a video/photo survey of the existing surfacing and a cash security deposit to the County for any necessary repairs and/or restoration of the roadways to their original pre project condition. Prior to occupancy and use of the site, the roadway surfacing should be repaired and/or restored prior to release of any security.

5. Any project improvements extending to the west along Phillip Road may be within the Placer County maintained portion of Phillip Road and the County's jurisdiction and any improvements necessary along South Brewer Road would be within the County's jurisdiction. Improvements within the County's jurisdiction would require the developer to obtain an Encroachment Permit and/or Improvement Plan approval from Placer County.

Placer County Environmental Health

1. The facility will be regulated by Placer County Environmental Health as the Local Enforcement Agency for CalRecycle. Environmental Health will review and comment on the Draft EIR when it is available for public review.
2. Operation of a RRTO will include transportation and handling of both hazardous materials and flammable materials such as batteries many of which are commonly found in household trash. The EIR should evaluate hazard and hazardous material impacts associated with Recycling and Recovery Operations, including composting, and include a wildfire assessment.
3. The project EIR should evaluate and establish mitigation measures to minimize the risk of impacts due to vectors during both the construction and operational phases, including a potential composting operation.

Cumulative Impacts

The EIR should consider the potential for cumulative effects in all of the aforementioned resource categories, especially with the potential for two MRFs in close proximity, and it should analyze meaningful alternatives that reduce impacts to County facilities, infrastructure, Specific Plan Areas, and residents.

Financial Impacts

Placer County, along with the City, is a member agency of WPWMA. The member agencies' collective investments and long-standing commitments to WPWMA are necessary to ensure the interrelationship between assurances of waste flows and the successful funding and operation of the WPWMA facilities. These benefits include meeting and achieving regulatory mandates and providing our residents with efficient and cost-effective waste and recycling services. Recently, commitments were made to help fund an expansion to the WPWMA facilities (currently under construction) which required the issuance of \$120M in solid waste revenue bonds payable over 30 years. The expansion was unanimously approved by the WPWMA Board of Directors and specifically designed to accommodate forecasted growth in the region, multiple waste streams including blue bins, volatile markets, and changes in state regulations including SB 1383. While the current contractual commitment between the City and WPWMA guarantees delivery of all the City's waste through and one year beyond repayment of the bonds, after July 1, 2025, the commitment of tonnage is significantly reduced.

The proposed Project, since it is sized with capacity to serve areas outside of the City's jurisdiction, has the potential to further divert additional flows away from WPWMA and/or act as competition. The County is concerned that the reduction in waste flows and corresponding reduction in revenue would, at minimum, affect waste collection fees for Placer County residents and businesses and it would hinder WPWMA's ability to generate the required cash flow to fulfill ongoing operational costs and debt repayments. This potentially leaves County residents without a feasible option for solid waste disposal – an essential public service – and could compromise regulatory compliant recycling services.

Thank you again for the opportunity to comment on the NOP for the Project. The County Executive Office would like to meet with the City to gain a clearer understanding of the Project's specifics and to discuss the concerns in greater detail. Any environmental-related questions can be directed to Leigh Chavez, Environmental Coordinator at lchavez@placer.ca.gov or 530-745-3077.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Chatigny". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Daniel Chatigny
County Executive Officer

NATIVE AMERICAN HERITAGE COMMISSION

July 9, 2024

Jessica Lynch
City of Roseville
311 Vernon Street
Roseville CA 95678

Re: 2024060953, Roseville Environmental Utilities Operations Center Project, Placer County

Dear Ms. Lynch:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

 - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project's impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@NAHC.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse



Central Valley Regional Water Quality Control Board

22 July 2024

Jessica Lynch
City of Roseville
311 Vernon Street
Roseville, CA 95678
jjlynch@roseville.ca.us

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, ROSEVILLE ENVIRONMENTAL UTILITIES OPERATIONS CENTER PROJECT, SCH#2024060953, PLACER COUNTY

Pursuant to the State Clearinghouse's 21 June 2024 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Roseville Environmental Utilities Operations Center Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as

required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention

Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more

information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

A handwritten signature in blue ink that reads "Peter G. Minkel".

Peter G. Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8401
www.dot.ca.gov



July 16, 2024

GTS# 03-PLA-2024-01291
SCH# 2024060953

Ms. Jessica Lynch
Environmental Coordinator
City of Roseville
311 Vernon Street
Roseville, CA 95678

Roseville Environmental Utilities Operations Center Project

Dear Ms. Lynch:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The project would be located on Phillip Road on 243 acres of undeveloped land along the northwest boundary of Roseville, in the City of Roseville, Placer County. This project is approximately 9.0 miles from State Route (SR) 99, 7.0 miles from SR 65 and 10.0 from Interstate (I) 80. The City proposes to construct and operate a new Environmental Utilities (EU) Operations Center to address the City's growing demands for municipal services, State requirements to electrify the City's waste collection vehicles, as well as changing solid waste regulations. The project includes two primary components: a Resource Recovery and Transfer Operations facility, to manage the City's waste, recycling, and organics materials; and a Corporation Yard that would house various EU divisions that would be relocated from the existing Corporation Yard on Hilltop Drive. The project would be developed in phases over the next 30 years (2028-2058). Based on the Notice of Preparation of a Draft Environmental Impact Report (EIR) package provided, Caltrans has the following requests and recommendations:

Freeway Operations

Caltrans reviewed the Roseville Environmental Utilities Operations Center Project, Potential impacts to the SHS from the trip generation and trip distribution can be

Ms. Jessica Lynch, Environmental Coordinator
July 16, 2024
Page 2

determined once provided. The following is requested: Number of trips generated during the construction phase with a Traffic Control Plan (This is particular to the time/duration of construction of the facility for Phase 1 and 2). Additionally, please provide the total number of trips generated and the Trip Distribution diagram.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,



GARY ARNOLD, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3



June 26, 2024

Jessica Lynch
City of Roseville
311 Vernon St
Roseville, CA 95678

Ref: Gas and Electric Transmission and Distribution

Dear Jessica Lynch,

Thank you for submitting the Notice of Preparation for the Roseville Environmental Utilities Operations Center Project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: <https://www.pge.com/en/account/service-requests/building-and-renovation.html>.
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf>

1. **Standby Inspection:** A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
2. **Access:** At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
3. **Wheel Loads:** To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. **Grading:** PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
5. **Excavating:** Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch



wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [$24/2 + 24 + 36/2 = 54$] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible ($90^\circ \pm 15^\circ$). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.



11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as **"RESTRICTED USE AREA – NO BUILDING."**
2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.



8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.



July 19, 2024

City of Roseville Development Services – Planning
Jessica Lynch, Environmental Coordinator
311 Vernon Street
Roseville, CA 95678

Transmitted Via Email: jjlynch@roseville.ca.us

Subject: Notice of Preparation Roseville Env. Utilities Operations Center

Dear Ms. Lynch:

This letter is in response to your request for comment on the City of Roseville's Notice of Preparation of an Environmental Impact Report for the proposed Roseville Environmental Utilities Operations Center.

The Placer Conservation Authority (PCA) is a California Joint Powers Authority by and between the County of Placer, City of Lincoln, Placer County Water Agency, and South Placer Regional Transportation Authority tasked with the successful implementation of the Placer County Conservation Program (PCCP). The PCCP is a federal Endangered Species Act Habitat Conservation Program, State Natural Community Conservation Plan with programmatic permitting authority under both sections 401 and 404 of the Clean Water Act.

The project location and exhibits identify the project as being 243 acres in the northwest limit line of the City of Roseville, Placer County. This location is comprised of rice and hay farming immediately adjacent to Pleasant Grove Creek and the Reason Farms Environmental Preserve and Al Johnson Wildlife Area.

It is particularly important to note relative to the project's location that PCA is under contract to purchase the Mourier West Property immediately north of and adjacent to the proposed project. This acquisition is being funded through a California Wildlife Conservation Board 30x30 Program grant. The Reason Farms Environmental Preserve, Al Johnson Wildlife Area, and Mourier West conservation acquisition represent a

significant landscape scale conservation area that when combined with the PCA's Mourier East 241-acre preserve, Toad Hill Ranch Mitigation Bank, and other significant conservation areas represent a block of conservation lands totaling approximately 4,116 acres. This area is designed to link the Pleasant Grove Creek corridor with existing and proposed conservation lands preserving nesting and foraging habitat for Swainson's hawk, tri-colored blackbird, burrowing owl, and other listed species. In addition, protected vernal pool species, including vernal pool fairy shrimp, were found in multiple aquatic features on the Mourier West Property directly north of the project site. The Project site itself is comprised of natural and semi-natural lands providing suitable habitat for fourteen special-status species, seven of which are Covered Species by the PCCP.

As a result, the draft EIR should assess both the direct and indirect effects of the conversion of lands from natural and semi-natural habitat into urban developed land uses associated with the project and the surrounding conservation lands including the overall viability of the associated conservation plans and listed and unlisted species. Indirect effects may include groundwater and surface water quality, lighting, noise, trash, impacts to nesting birds, as well as foraging habitat for listed bird species.

As you are aware, Pleasant Grove Creek traverses the northerly border of the project site and serves as the southerly border of the Mourier West Property. It is anticipated by the 30x30 grant and goals and objectives of the PCCP that this stream corridor and its floodplain will be restored and enhanced with shaded riverine/riparian habitat in an effort to continue to improve water quality, temperature, turbidity and other benefits to covered species and their habitat.

In order to ensure adequacy and comply with CEQA, the draft EIR must include analyses of the direct and indirect effects of the project on these species, wetlands, waters, streams, and whether the project is consistent with the adopted and permitted Habitat Conservation Plan, Natural Community Conservation Plan, and County Aquatic Resources Program (PCCP).

Thank you for your time and consideration.

Sincerely,

**Gregg
McKenzie**
Gregg McKenzie
Executive Director

Digitally signed by
Gregg McKenzie
Date: 2024.07.19
12:48:14 -07'00'



July 22, 2024

Jessica Lynch
Environmental Coordinator
City of Roseville Development Services – Planning
311 Vernon Street
Roseville, CA 95678

Subject: SCH No. 2024060953 –Notice of Preparation for Roseville Environmental
Utilities Operations Center Project – Placer County

Dear Ms. Lynch,

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The City of Roseville Development Services Planning Division, as the Lead Agency, has prepared and circulated a Notice of Preparation (NOP) in preparing an Environmental Impact Report (EIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The City of Roseville proposes to construct and operate a new Environmental Utilities Operations Center to address the City's projected demands for municipal services, State requirements to electrify the City's waste collection vehicles, and changing State law related to solid waste management. The project would provide a common location for the City's management of its waste, recycling, and organics materials; fleet charging; and various divisions of the City's Environmental Utilities (EU) department.

The proposed Environmental Utilities Operations Center would be located on Phillip Road (near its western terminus at South Brewer Road) on 243 acres of undeveloped land in the northwest limit line of the City of Roseville, Placer County. The project site, owned by the City, is currently largely agricultural and is leased for rice and hay farming.

The total development area is currently anticipated to be less than the project site; however, the exact location of project components has yet to be finalized. For that reason, the City of Roseville proposes to assess the entire project site in the event that project components may need to be relocated for design or avoidance purposes. The project site includes portions of Assessor's Parcel Numbers (APNs) 017-010-033-000, 017-090-054-000, and 017-090-055-000.

COMMENTS

Solid Waste Regulatory Oversight

The Placer County, Department of Health & Human Services, Environmental Health Services is the Local Enforcement Agency (LEA) and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Paul Holloway, at (530) 745-2345 to discuss the regulatory requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the NOP and in carrying out their responsibilities in the CEQA process.

CalRecycle staff request copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff request 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at (916) 341-6115 or by email at Lauren.Grant@calrecycle.ca.gov.

Sincerely,

Lauren Grant  Digitally signed by Lauren Grant
Date: 2024.07.22 15:41:00 -07'00'

Lauren Grant, Environmental Scientist
Permitting & Assistance Branch – North Section Central Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Patrick Snider, Supervisor
Permitting & Assistance Branch – North Section Central Unit

Paul Holloway, REHS, Placer County LEA



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



July 22, 2024

Jessica Lynch
Environmental Coordinator
City of Roseville Development Services – Planning
311 Vernon Street
Roseville, CA 95678
jjlynch@roseville.ca.us

Subject: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT
FOR THE PROPOSED ROSEVILLE ENVIRONMENTAL UTILITIES
OPERATIONS CENTER PROJECT
SCH No. 2024060953

Dear Jessica Lynch:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of an Environmental Impact Report (EIR) from City of Roseville (City) for the Roseville Environmental Utilities Operations Center Project (Project) in Placer County pursuant the California Environmental Quality Act (CEQA) statute and guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants and their habitats. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located on Phillip Road on 243 acres of undeveloped land along the northwest boundary of Roseville, in the City of Roseville, Placer County. The Project site includes portions of Assessor's Parcel Numbers (APNs) 017-010-033-000, 017-090-054-000, and 017-090-055-000.

The Project consists of the proposed construction and operation of a new Environmental Utilities Operations Center to address the City's projected demands for municipal services, State requirements to electrify the City's waste collection vehicles, and changing State law related to solid waste management. The Project will provide a common location for the City's management of its waste, recycling, and organics materials; fleet charging; and various divisions of the City's Environmental Utilities (EU) department. The Project includes two primary components: a Corporation Yard that will house various EU divisions relocated from the existing Corporation Yard on Hilltop Drive, and a Resource Recovery and Transfer Operations (RRTO) facility to manage the City's waste, recycling, and organics materials.

The RRTO Facility and Corporation Yard will be sized to accommodate multiple phases of Project development. The first phase includes the construction of a 200,000 square foot multipurpose building to serve all three waste streams (recyclables, municipal solid waste, and organics). A permanent administration office will be constructed in a later Project phase. In the interim, the City may install temporary portable buildings on the Project site to serve as temporary administrative office space. The Project includes improvements to Phillip Road for approximately 2.5 miles, in addition to extending water, wastewater, stormwater, and electrical infrastructure to the site.

The Project will be developed in phases over the next 30 years, beginning with the development of the RRTO facility, estimated to open in 2028. Subsequent phased expansions of the RRTO and the Corporation Yard will be developed on an as-needed basis, with ultimate buildout expected by 2058.

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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the forthcoming EIR address the following:

Project Description

The Project description should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

As required by § 15126.6 of the CEQA Guidelines, the EIR should include an appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to resources under CDFW's jurisdiction.

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the EIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. CDFW recommends the EIR specifically include:

1. An assessment of all habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following, *The Manual of California Vegetation*, second edition (Sawyer 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW recommends that the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. A nine United States Geologic Survey 7.5-minute quadrangle search is recommended to determine

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what may occur in the region, larger if the Project area extends past one quad (see *Data Use Guidelines* on the Department webpage www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data). Please review the webpage for information on how to access the database to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the Project. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship System, California Native Plant Society Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations.

3. A complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code § § 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. The EIR should include the results of focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Species-specific surveys should be conducted in order to ascertain the presence of species with the potential to be directly, indirectly, on or within a reasonable distance of the Project activities. CDFW recommends the City rely on survey and monitoring protocols and guidelines available at: www.wildlife.ca.gov/Conservation/Survey-Protocols. Alternative survey protocols may be warranted; justification should be provided to substantiate why an alternative protocol is necessary. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Some aspects of the Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought or deluge.
4. A thorough, recent (within the last two years), floristic-based assessment of special-status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see www.wildlife.ca.gov/Conservation/Plants).

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5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The EIR should provide a thorough discussion of the Project's potential direct, indirect, and cumulative impacts on biological resources. To ensure that Project impacts on biological resources are fully analyzed, the following information should be included in the EIR:

1. The EIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The EIR must demonstrate that the significant environmental impacts of the Project were adequately investigated and discussed and it must permit the significant effects of the Project to be considered in the full environmental context.
2. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by Project activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages. The EIR should address Project-related changes to drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
3. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Conservation or Recovery Plan, or other conserved lands).
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The EIR should discuss the Project's cumulative impacts to natural resources and determine if that contribution would result in a significant impact. The EIR should include a list of present, past, and probable future projects producing related impacts to biological resources or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include impact analysis of vegetation and habitat reductions within the area and their potential cumulative effects. Please include all potential direct and indirect Project-related impacts to riparian areas, wetlands, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and/or special-

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status species, open space, and adjacent natural habitats in the cumulative effects analysis.

Mitigation Measures for Project Impacts to Biological Resources

The EIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. CDFW also recommends the environmental documentation provide scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Several Fully Protected Species (Fish & G. Code § § 3511 and 4700) have the potential to occur within or adjacent to the Project area, including, but not limited to: white-tailed kite (*Elanus leucurus*), bald eagle (*Haliaeetus leucocephalus*), golden eagle (*Aquila chrysaetos*), California black rail (*Laterallus jamaicensis coturniculus*), and northern California ringtail (*Bassariscus astutus ssp. raptor*). Project activities described in the EIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. If fully protected species cannot be completely avoided, the Project should obtain incidental take coverage for all species that have the potential to be present within or adjacent to the Project Area². CDFW also recommends the EIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the City include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.
2. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: western spadefoot (*Spea hammondi*), western pond turtle (*Actinemys marmorata*), northern harrier (*Circus hudsonius*), Vaux's swift (*Chaetura vauxi*), purple martin (*Progne subis*), yellow-headed blackbird (*Xanthocephalus xanthocephalus*), yellow-breasted chat (*Icteria virens*), loggerhead shrike (*Lanius ludovicianus*), yellow warbler (*Setophaga petechia*), grasshopper sparrow (*Ammodramus savannarum*), long-eared owl (*Asio otus*), western burrowing owl

² CDFW may only issue incidental take permits for specified projects if certain conditions are satisfied per SB 147.

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(*Athene cunicularia* ssp. *hypugaea*), olive-sided flycatcher (*Contopus cooperi*), pallid bat (*Antrozous pallidus*), and American badger (*Taxidea taxus*). Project activities described in the EIR should be designed to avoid any SSC that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the EIR fully analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends the City include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SSC.

3. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer 2009). The EIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
4. *Native Wildlife Nursery Sites*: CDFW recommends the EIR fully analyze potential adverse impacts to native wildlife nursery sites, including but not limited to bat maternity roosts. Based on review of Project materials, aerial photography, and observation of the site from public roadways, the Project site contains potential nursery site habitat for structure and tree roosting bats and is near potential foraging habitat. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). CDFW recommends that the EIR fully identify the Project's potential impacts to native wildlife nursery sites, and include appropriate avoidance, minimization and mitigation measures to reduce impacts or mitigate any potential significant impacts to bat nursery sites.
5. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the EIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration, enhancement, or permanent protection should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The EIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and

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management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

6. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in the regional ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be appropriately timed to ensure the viability of the seeds when planted. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project. Examples may include retention of woody material, logs, snags, rocks, and brush piles. Fish and Game Code sections 1002, 1002.5 and 1003 authorize CDFW to issue permits for the take or possession of plants and wildlife for scientific, educational, and propagation purposes. Please see our website for more information on Scientific Collecting Permits at www.wildlife.ca.gov/Licensing/Scientific-Collecting#53949678-regulations-.

7. *Nesting Birds*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-

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prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Potential habitat for nesting birds and birds of prey is present within the Project area. The Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the EIR.

CDFW recommends the EIR include specific avoidance and minimization measures to ensure that impacts to nesting birds or their nests do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The EIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. In addition to larger, protocol level survey efforts (e.g., Swainson's hawk surveys) and scientific assessments, CDFW recommends a final preconstruction survey be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

8. *Moving out of Harm's Way*: The Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, the City should state in the EIR a requirement for a qualified biologist with the proper handling permits, will be retained to be onsite prior to and during all ground- and habitat-disturbing activities. Furthermore, the EIR should describe that the qualified biologist with the proper permits may move out of harm's way special-status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities, as needed. The EIR should also describe qualified biologist qualifications and authorities to stop work to prevent direct mortality of special-status species. CDFW recommends fish and wildlife species be allowed to move out of harm's way on their own volition, if possible, and to assist their relocation as a last resort. It should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for habitat loss.
9. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as these efforts are generally experimental in nature and largely unsuccessful. Therefore, the EIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

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The EIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the EIR should be made a condition of approval of the Project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral. CEQA Guidelines section 15126.4, subdivision (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. To avoid deferring mitigation in this way, the EIR should describe avoidance, minimization and mitigation measures that would be implemented should the impact occur.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (Fish & G. Code § 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project.

State-listed species with the potential to occur in the area include, but are not limited to: western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), willow flycatcher (*Empidonax traillii*), tricolored blackbird (*Agelaius tricolor*), bank swallow (*Riparia riparia*), Swainson’s hawk (*Buteo swainsoni*), giant garter snake (*Thamnophis gigas*), and Boggs Lake hedge-hyssop (*Gratiola heterosepala*).

The EIR should disclose the potential of the Project to take State-listed species and how the impacts will be avoided, minimized, and mitigated. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, if applicable, CDFW recommends the EIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service to coordinate specific measures if both State and federally listed species may be present within the Project vicinity.

Native Plant Protection Act

The Native Plant Protection Act (Fish & G. Code §1900 *et seq.*) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Lake and Streambed Alteration Program

The EIR should identify all perennial, intermittent, and ephemeral rivers, streams, lakes,

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other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The environmental document should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources the EIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;
2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the EIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. All LSA Notification types must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such

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as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW relies on the lead agency environmental document analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.
2. Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Based on review of Project materials, aerial photography, and observation of the site from public roadways, the Project site supports Pleasant Grove Creek and its associated riparian habitat. CDFW recommends the EIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code § 711.4; Pub. Resources Code, § 21089.)

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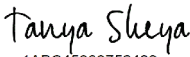
CONCLUSION

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the Notice of Preparation of the EIR for the Project and recommends that the City address CDFW's comments and concerns in the forthcoming EIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

If you have any questions regarding the comments provided in this letter or wish to schedule a meeting and/or site visit, please contact Patrick Moeszinger, Senior Environmental Scientist (Specialist) at (916) 767-3935 or patrick.moeszinger@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tanya Sheya
Environmental Program Manager

ec: Dylan Wood, Senior Environmental Scientist (Supervisory)
Patrick Moeszinger, Senior Environmental Scientist (Specialist)
Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California.
<http://vegetation.cnps.org/>