

---

---

**Appendix B**  
**Comments on Notice of Preparation**

---

---



# LOZANO SMITH

ATTORNEYS AT LAW

*A Professional Corporation*

Harold M. Freiman  
Attorney at Law

E-Mail: hfreiman@lozanosmith.com

September 13, 2002

**By U.S. Mail & Fax: (916) 774-5129**

Kathy Pease  
Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, CA 95678

Re: Response of Center Joint Unified School District to Notice of Preparation of the Draft Environmental Impact Report for the: (1) City of Roseville West Roseville Specific Plan/Sphere of Influence Expansion/Annexation Project; and (2) City of Roseville Sphere of Influence Project for the City/County Memorandum of Understanding Regarding Area

Dear Ms. Pease:

We write on behalf of Center Joint Unified School District ("CJUSD") with comments on the Notice of Preparation ("NOP") for the above described environmental impact report ("EIR"). CJUSD appreciates the opportunity to express its views as to the scope and content of the environmental information relevant to the District's responsibilities as well as the responsibilities of the two other school districts which will serve the Project: Roseville Elementary School District and Roseville Joint Union High School District.

A central concern of CJUSD is that the EIR address which school districts will serve the anticipated new development, and that the EIR further address the ability of those school districts to continue providing adequate facilities and a safe environment to its existing students and students that will be generated by new development.

As CJUSD has expressed in the past to the County of Placer, CJUSD is particularly concerned about what appears to be a trend in Placer County to disregard school district boundaries in land use planning. Developments are being planned that are primarily located in one school district, but which have a smaller portion of the development in another school district, with no logical dividing point between the two. Furthermore, anticipated school sites are being identified that rest immediately on the boundary between the districts, located in the district that will contain more of the houses. Such developments create extreme pressures to change the long established, pre-existing school district boundaries to match the limits of the development. This in turn leads

2010 Crow Canyon Place, Suite 170 San Ramon, California 94583-1344 Tel 925-302-2000 Fax 925-302-2010  
Website: [www.lozanosmith.com](http://www.lozanosmith.com)

Fresno

Monterey

San Rafael

San Ramon

Santa Monica

Vista

to: difficulty on the part of school districts in being able to plan for their future growth; uncertainty for the school districts, developers and community alike; uncoordinated planning; and future disputes that can delay development, and result in high costs to the public as school districts are forced to contest or even litigate over reorganization efforts. A further concern is that the trend appears to be towards developments that would reorganize the school district so as to take relatively wealthier and less ethnically diverse homes from a more diverse school district and transfer them to a wealthier school district, increasing the potential for segregation and for economic impacts on the less wealthy school district. This is particularly troubling in light of the fact that the motivation behind the territory transfer is more often than not to increase the value of property or homes in the transfer area.

The foregoing factors were all involved in the current school district boundary dispute that has been taking place in Placer County involving the Morgan Creek Community Facilities District Area. The development planned there rests primarily in Dry Creek Elementary School District and Roseville Joint Union High School District, but an area of approximately 240 planned homes juts to the west, into CJUSD. The certified EIR for the development project appears to have erroneously identified the school district boundaries. Perhaps as a result, the developers planned a school for Dry Creek Elementary School District that was actually located in CJUSD. Furthermore, the developer planned residential units that straddled not only the actual boundary between the districts, but also the incorrect boundary identified in the EIR. Little or no consideration was given to the impact on the school districts involved.

The Morgan Creek developers ultimately petitioned for a territory transfer to the Placer and Sacramento County Committees on School District Organization. CJUSD has had to engage in a protracted and expensive conflict with the developers over whether the reorganization should occur. The Placer County Committee approved the transfer, but the Sacramento County Committee denied it, citing the impacts on CJUSD and the financial motivation of the developers seeking the transfer. This issue must now be resolved by the State Board of Education, and may take another year or longer finally to be decided. CJUSD and the Morgan Creek developers can certainly attest that all parties would have been better served if these issues had been resolved at the outset, prior to completion of the EIR process.

The situation described in the current NOP is strikingly similar to the Morgan Creek setting. Like Morgan Creek, the bulk of the proposed development being addressed rests outside of CJUSD, but with a smaller area to the west within CJUSD. CJUSD's consultants estimate based on the limited information in the NOP that 300 to 500 units might ultimately be built in the CJUSD portion of the territory. Attached hereto is a version of Figure 2 to the NOP, to which CJUSD's consultants have added an approximate demarcation of the border between the respective school districts. This attached figure has been prepared based solely on preliminary information, and should be verified before being relied upon for the precise boundary. This map bears great similarity to the one that CJUSD has been contending with in Morgan Creek

As the revised map shows, a new elementary school is located immediately to the east of the school district boundary, just beyond CJUSD's territory. Again, this was essentially the same situation as in Morgan Creek. Locating a new school at this precise location is likely to lead to a petition to transfer the rest of the development into the territory of the Roseville school districts. It is predictable that the developer or later homeowners will contend that it is illogical for students living immediately next to a new school not to go to that new school with their neighbors from the east.

As was evidenced by the confusion and disputes regarding the Morgan Creek situation, failing to take school district boundaries into consideration, or creating situations that will later be used to prompt efforts at school district boundary changes, is simply bad planning. For purposes of the NOP, CJUSD notes that this situation must be addressed in the EIR, as must the consequences and impacts on the school districts and the neighborhoods that will be created.

In this instance, the involved developers have stated their intent not to seek any change to existing school district boundaries. That intent should also be addressed in the EIR. As a result of that intent, the location of the school should be re-thought. CJUSD notes that its concerns regarding the proximity of the proposed school to CJUSD's boundaries, and the resulting pressure to move school district boundaries, can be resolved by ensuring that schools are located at least one mile from the boundary of any school district. Locating schools in such a fashion allows for logical planning, as public facilities are generally located more centrally to a public agency, rather than being scattered along its borders. CJUSD would certainly be interested in discussing the possibility of providing new school facilities to serve the proposed new development, which facilities would be within CJUSD, following the guideline of staying at least one mile from the boundary line of the affected school districts.

The placement of roads and traffic circulation should also be addressed so as to take into consideration existing school sites, planned school sites, and existing school district boundaries. For example, will appropriate roads be planned to allow access from the CJUSD portion of the proposed development to existing or planned CJUSD schools? If not, this would result in a significant impact, as traffic patterns to CJUSD's schools would be disrupted and poorly planned.

CJUSD looks forward to working with the City, the County and the Placer County Local Agency Formation Commission in ensuring that adequate and safe facilities will in fact be in place with this new development, and that the existing borders of the affected school districts will be considered and honored. CJUSD offers to be an active participant in the preparation of the schools section of the EIR, in the analysis of relevant data, in the identification of impacts relating to schools and in formulating appropriate mitigation measures.

In that regard, the CJUSD submits the following general comments regarding Project scope and description, overall comments applicable to both the Project and Program EIR aspects of the Project, and comments, including categories of information specific to the Project EIR aspect of

the Project. The CJUSD wishes to see these comments and categories of information addressed in the Draft EIR, each of which the CJUSD feels is necessary for an adequate assessment of the impact of this project on local schools.

## **PROJECT SCOPE AND DESCRIPTION**

### **Project Components**

The Project scope and description is ambiguous and confusing. The Project appears to be two projects in one. First, there is a Draft Environmental Impact Report for the City of Roseville West Roseville Specific Plan/Sphere of Influence Expansion/Annexation Project. This EIR is apparently a project specific EIR. Second, there is a Draft Environmental Impact Report for the City of Roseville Sphere of Influence Expansion for a remainder area under a City/County Memorandum of Understanding. This EIR is apparently a program EIR.

As currently written, the reader is left to guess and extrapolate as to the Project scope and description. The Draft EIR should clearly distinguish between the two Project components, explain what the City/County MOU is and why that is utilized in defining the Project scope and description, and clearly articulate which level of analysis is being used.

### **Explanation for Selected Boundaries**

There is an inadequate explanation as to how the boundaries were drawn for the two components of the Project. The boundaries are irregular and apparently deviate from the City/County MOU planning area. The Draft EIR should explain in detail the basis for drawing the boundaries for each of the two components of the Project. This issue is of particular concern to the CJUSD, as the irregular shape of the boundaries just clips the CJUSD boundaries. Again, CJUSD's consultants, based on rough calculations, have estimated that 300-500 dwellings will be constructed in this area.

### **Consideration of Existing City Facilities**

The Project description and scope excludes from consideration existing lands owned by the City of Roseville and utilized for a regional waste water treatment plant and possible future power plant. Although this land is not part of the Project development, it is within the middle of the Project and should not be excluded from the environmental analysis. The impacts from these existing and planned City facilities should be considered as well as the impacts from the Project on these City facilities.

### **Certification of the EIR Before any Project Approvals**

Pages 9-10 of the Notice of Preparation reference Project approvals that will be required by the West Roseville Specific Plan. Out of 13 approvals, certification of the EIR is listed as number

11. The Draft EIR should reflect that certification of the Project EIR must occur before any Project approvals, consistent with the requirements of CEQA.

**COMMENTS APPLICABLE TO BOTH THE PROJECT AND PROGRAM EIR  
ASPECTS OF THE PROJECT**

The Draft EIR should accurately define the geographic boundaries for the three school districts, and represent those boundaries on maps and diagrams in relation to the Project. It is critical that the Draft EIR base its analysis on accurate boundary descriptions. There should be no assumptions that any of the school district boundaries will change or that territory from one school district will be transferred to another. This is what occurred in the Morgan Creek Community Facilities District EIR. In fact, that EIR contained errors in the boundary lines.

Once an accurate description is obtained, the Draft EIR should describe how many students are within each district, which schools within those school districts serve existing students and what schools are proposed to serve additional students generated from this Project and other projects in the area. All land use decisions, including the location of residential housing, commercial and industrial development, public facilities, and infrastructure (roads, water, sewer, etc.) should consider school district boundaries and the location of existing and future schools.

If there is a possibility of a future proposal for a change in school district boundaries or a transfer of territory from one district to another, this should only be considered after a complete analysis is made as if no change or transfer occurs. Such speculative information may not be used in accessing the existing impacts upon the school districts. (See Cal. Code Regs., tit. 14, §§ 15064(f), 15384.) Further, we want to emphasize that we have received assurances from the developers that they have no intent on seeking any changes to existing school district boundaries.

It is imperative that the preparer of the Draft EIR consult with representatives from the three school districts to obtain the necessary information to address these issues.

**COMMENTS AND CATEGORIES OF INFORMATION SPECIFIC TO THE PROJECT  
EIR ASPECT OF THE PROJECT**

**Population**

1. Describe historical, current, and future population projections for each of the involved school districts.

CJUSD specifically requests that historical, current, and future population projections for each of the involved school districts be addressed. Population growth or shrinkage is a primary consideration in determining the impact that development may have on a school district, as a booming population can directly impact the CJUSD and its provision of educational services, largely because of resulting school overcrowding, while a district with declining enrollment may

depend on new development to avoid school closure or program cuts. Overcrowding can constitute a significant impact within the meaning of the California Environmental Quality Act ("CEQA"). (See Cal.Code Regs., tit.14, §§ 15064, 15126.) This is particularly so where the overcrowding results in unsafe conditions, decreased quality of education, the need for new bus routes, and requires new school construction. The same can hold true for potential school closures or program cuts resulting from a declining population.

### Housing

2. Describe the type and number of anticipated dwelling units.
3. Describe the average square footage for anticipated dwelling units, broken down by type of unit.
4. Estimate the amount of development fees to be generated by development in accordance with implementation of the Project.
5. Describe the phasing of residential and development over time from inception to build-out of the Project.
6. Identify the anticipated number of units available for low income housing.

The foregoing categories of information (Request Nos. 2-6) are critical for determining the extent of both physical and fiscal impacts on the District. California school districts are dependent on the provisions of Government Code Sections 65995, et seq., and Education Code sections 17600, et seq. for financing new school facilities and maintenance of existing facilities. The developer fees mandated by Section 65995, provide the CJUSD the bulk of its financing for facilities needs.

The ability of the statutory development fees to offset the impact of new development on local school districts can be determined only if types of housing and average square footage can be taken into consideration. For instance, larger homes are expected to generate approximately the same number of students as smaller homes. At the same time, however, a larger home will generate a greater statutory development fee, better providing for facilities to house the student being generated. It is for these reasons that the Government Code now requires a school district to seek - and presumably to receive - such square footage information from local planning departments. (Gov. Code § 65995.5 (c)(3).)

While the foregoing funding considerations are fiscal, they translate directly into physical, environmental impacts, in that inadequate funding for new school construction can result in overcrowding of existing facilities. Furthermore, fiscal and social considerations are relevant to an EIR, particularly when they either contribute to or result from physical impacts. (Public Resources Code § 21001(g); Cal.Code Regs., tit.14, §§ 15021(b), 15131(a)-(c), 15142 & 15382.)

Phasing of development is also a crucial consideration in determining the extent of impact on schools. The timing of the development will determine when new students are expected to be generated, and therefore is an important consideration particularly when considering the cumulative impact of a project in conjunction with other development.

### Transportation/circulation/traffic Analysis

7. Describe the existing and the anticipated vehicular traffic and student pedestrian movement patterns to and from school sites, including consideration of bus routes.
8. Assess the impact of increased vehicular movement and volumes, including potential conflicts with school pedestrian movement, school transportation, and busing activities.
9. Estimate travel demand and trip generation, trip distribution and trip assignment by including consideration of school sites and home-to-school travel.
10. Assess cumulative impacts on schools and the community in general resulting from increased vehicular movement and volumes expected from additional development already approved or pending.

CJUSD makes the foregoing requests to ensure that traffic impacts on schools are adequately addressed in the EIR. Traffic issues are a particular concern for school districts in that increased traffic volume may interfere with established school bus routes, require new and additional routes, and may increase safety concerns for students walking or riding bicycles or other modes of transportation to and from school. In this instance, the traffic pattern also may have long term consequences on school district organization that should be addressed.

Regarding inclusion of school sites in estimating trip demand, generation, distribution and assignment, CJUSD assumes that school sites would be one category used in determining impacts, but if not, requests that it be considered one.

### Public Services - Schools

11. Describe existing and future conditions within each school district, on a school-by-school basis, including size, location and capacity of facilities.
12. Describe the adequacy of both existing infrastructure serving schools and anticipated infrastructure needed to serve future schools.
13. Describe each school district's past and present enrollment trends.

14. Describe each district's current uses of their facilities.
15. Describe projected teacher/staffing requirements based on anticipated population growth and existing State and school district policies.
16. Describe any impacts on curriculum as a result of anticipated population growth.
17. Identify the cost of providing capital facilities to accommodate students on a per-student basis, by school district.
18. Identify the expected shortfall or excess between the estimated development fees to be generated by the projects and the cost for provision of capital facilities.
19. Assess the each school district's present and projected capital facility, operations, maintenance, and personnel costs.
20. Assess financing and funding sources available to the school districts, including but not limited to those mitigation measures set forth in Section 15996 of the Government Code.
21. Identify any expected fiscal impacts on the school districts, including an assessment of projected cost of land acquisition, school construction, and other facilities needs.
22. Assess cumulative impacts on schools resulting from additional development already approved or pending.

The CJUSD wishes to make certain that each of these issues are directly discussed in the EIR. Regarding Requests 11 - 14, each of these requests go to the issue of the current condition of the District. Infrastructure is included for consideration precisely because it is an often overlooked factor. While it may appear that a school site has sufficient space to accommodate additional students, an inadequate infrastructure -- which might include cafeterias, restroom facilities, sewerage, electrical capacity, and the like -- may preclude such growth. Placing too great a strain on the infrastructure is itself a physical impact to be addressed in an EIR.

Relative to Request 11, the Draft EIR should also address the location of current planned school sites in all affected school districts, both to determine the adequacy of the space existing or available for school facilities and also to address traffic, student safety and related impacts affected by a school's location. This analysis would necessarily include consideration of the location and adequacy of size of the site proposed for dedication not just to the adjoining school districts, but also to the CJUSD for a school within the Project area.

The population elements addressed in Request 13 are essential because the ultimate impact of growth can best be determined by comparing existing student enrollment, expected future enrollment, and total school capacity.

Request 14 is a necessary consideration because certain school facilities may have been designated for particular community uses, or otherwise be unavailable for full classroom service, meaning that they cannot be considered in determining the District's total capacity. Also, some classrooms are dedicated as labs, meaning that they cannot hold the full complement of students that would occupy a traditional classroom, again affecting a school's total capacity.

Requests 15 and 16 are included because they are relevant to the social impacts which may stem from the project. Again, such impacts are relevant to the extent they are caused by or result from physical impacts, which would include growth. (Pub. Resources Code § 21001(g); Cal. Code Regs., tit. 14, §§ 15021(b), 15131(a)-(c), 15142 & 15382.) If classrooms become overcrowded, or certain programs cannot be offered because of overwhelming student demand, the community's educational services are harmed, a clear social impact. Further, overcrowded classrooms create additional safety concerns, both for students and teachers.

Requests 17 through 21 deal with fiscal impacts on the districts. The most immediate means of determining whether school overcrowding will occur is to determine first whether the DJUSD has adequate available capacity, and second, if not, whether it has adequate sources of funding available to construct new facilities or expand existing ones. This requires consideration of how much it costs to house each student, and how much of that amount can be covered by existing funding sources. To the extent that the existing sources prove insufficient, the difference is an unmitigated impact on the District.

Finally, Request 22 again seeks to ensure that a cumulative impact analysis is conducted, as there has been a great deal of development recently approved within the District's borders.

### Noise

- 23. Identify any noise sources and volumes which may affect school facilities, classrooms and outdoor school areas.**

Request 23 is intended to clarify that the EIR's consideration of noise issues take into account various ways in which noise may impact the schools, including, for instance, increases in noise levels in the immediate vicinity of playing fields.

### Social

- 24. Identify how school facilities are currently utilized as civic centers, and are projected to serve in that capacity in the future, and assess the impacts of the projects on that use.**

25. Identify how each school district's grounds are currently utilized for recreations (parks) and open space, and are projected to serve in that capacity in the future, and assess the impacts of the projects on that use.
26. Address potential impacts on the socio-economic and ethnic diversity of the school districts, both before and after the project.

The first two requests are made in light of school districts' roles in providing recreational space and civic centers to the community. As overcrowding increases at school sites, the community's ability to so utilize school facilities becomes limited, which is both a physical and a social impact on the community. For example, the addition of relocatable classrooms to house new students may reduce available playing field or recreational space. Similarly, moving schools to multi-track class schedules, or having to set aside additional space for new alternative education students, may interfere with the community's ability to gain access to school facilities for civic use.

The final request relates to the socio-economic effect of the development on the composition of schools in the respective school districts. Such socio-economic effects can have direct physical consequences, such as the impacts stemming from increased movement by one racial or economic group to another school district and resulting facilities needs or pressures in the involved school districts.

### CONCLUSION

CJUSD is prepared to provide any information necessary to assist the City in preparation of the EIR and in addressing each of the comment and scope/content issues set forth above. CJUSD remains committed to working with the City, the County, and the developer to ensure that the District's needs are met and that the proposed Project can proceed forward.

Finally, we request that all notices and copies of documentation with regard to this project be mailed both to the CJUSD directly, and also to our legal counsel's attention as follows.

Rex Fortune, Superintendent  
Center Joint Unified School District  
8408 Watt Avenue  
Antelope, CA 95843  
tel (916) 338-6337  
fax(916) 338-6417

Kathy Pease  
September 13, 2002  
Page 11

Harold M. Freiman  
Lozano Smith  
2000 Crow Canyon Pl.  
San Ramon, CA94583  
tel (925) 302-2000  
fax(925) 302- 2010

Please feel free to contact me directly if we can be of any assistance.

Sincerely,

LOZANO SMITH



Harold M. Freiman

HMF/dw

Enclosure: Map regarding School District Boundaries (Marked Figure 2)

cc: (by facsimile, w/encl.)  
Dr. Rex Fortune, Superintendent, Center Joint Unified School District  
Mike Winters, Caldwell Flores Winters, Inc.

::ODMA\WORLD\Q:\RAM\_DOCS\00792\001\LTR\SR007976.WPD



**PLACER  
LOCAL AGENCY  
FORMATION COMMISSION**

175 Fulweiler Avenue, Auburn, California 95603  
530.889.4097 FAX: 530.886.4671

**DATE:** September 17, 2002

**TO:** Kathy Pease, Administrative Analyst

**FROM:** Deborah Cubberley, LAFCO Executive Officer

**SUBJECT:** NOP for West Roseville SP/ Sphere of Influence and Annexation

---

Thank you for the opportunity to review the NOP for the West Roseville Specific Plan. I am providing the following comments with regards to the preparation of the environmental document:

-Prior to any major sphere of influence revision, the Government Code Section 56430 requires that a Municipal Service Review be performed.

-Page 10 of the NOP mentions that the EIR will address consistency with applicable LAFCO policies. The EIR should also address consistency with applicable LAFCO statutes, in particular applicable portions of Section 56368.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

Ms Kathy Pearce, Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, California 95678

Dear Ms. Pearce:

This letter responds to the Notice of Preparation (NOP) of an EIR for the Proposed West Roseville Specific Plan. We have prepared these comments with a desire to assist you in your development of the EIR for the proposed annexation project.

As you may know, EPA, along with our interagency partners, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service and California Department of Fish and Game, have been coordinating with Placer County in an attempt to develop a Habitat Conservation Plan (HCP) and Natural Communities Conservation Plan (NCCP) for Western Placer County of which the City of Roseville is a part. Integral to the HCP/NCCP process is integration with the aquatic resource protection program under Section 404 of the Clean Water Act. The integrated process would identify aquatic and biological resources of exceptional value with the goal of discouraging development in these areas and providing long term conservation for these resources. Moreover, this comprehensive process would direct development in Western Placer to areas with few or degraded natural resources. The prime objective of this process is to provide developers with a measure of certainty regarding siting their projects, while ensuring adequate protection for the most valuable resources in the region.

Unfortunately, the West Roseville Specific Plan (WRSP), as proposed, may threaten the entire planning and permitting process, and seems to be inconsistent with the Placer Legacy Program. The proposed project, not including the "MOU Remainder" region, would result in intensive residential commercial and industrial development on over 5,700 acres of land currently in unincorporated Placer County. The project area (not including the "MOU Remainder" parcels) supports about 1,100 acres of vernal pool landscapes (i.e., vernal pools and their adjacent uplands that are necessary for their continued viability). This constitutes over 5 % of the remaining vernal pool landscapes in Western Placer County.

Although the Westpark/Fiddymont Ranch developers indicate that the proposed project would "preserve" approximately 60% of the on-site wetlands in open space, an evaluation of the proposed land use plan (Figure 2 of the NOP) suggests that indirect impacts will eventually result in the loss of virtually all these resources. The Open Space areas containing aquatic resources are small, fragmented and surrounded by intensive human uses (note for example the numerous thin, approximately 100 foot wide strips of Open Space on the proposed land use plan). As mentioned above, wetlands such as vernal pools are dependent on the quality of the uplands surrounding them. The proposed development is expected to alter hydrology, increase contaminated runoff, introduce exotic vegetation and result in incompatible uses by people, domestic pets and feral

Printed on Recycled Paper

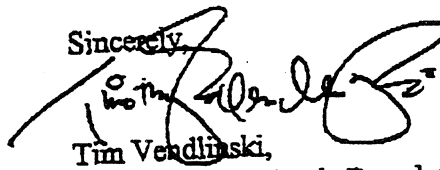
animals. Eventual degradation and loss of the aquatic resources are expected to result. In addition, opportunities for necessary management of wetland conservation sites, such as grazing and controlled burning, is unlikely, given the adjacent urban environment. Although the Open Space areas may help maintain water quality and provide other amenities, for the reasons stated above, they will not result in conservation of natural aquatic resources, nor their functions or values.

We recommend that the "Reduced Development" alternative evaluated in the EIR include avoidance of all areas north of Pleasant Grove Creek and the area south and west of the Pleasant Grove Waste Water Treatment Plant (generally shown as Open Space in the Land Use Plan, but with wider buffers) with the remainder of the site being dedicated to development. Such an alternative would likely be consistent with the Placer County Legacy program and would allow the integrated Clean Water Act/HCP/NCCP process to move forward. The EIR should fully describe feasible avoidance, minimization and mitigation measures designed to assure conservation of Western Placer County resources consistent with the planning and permitting process exemplified by the proposed Clean Water Act /NCCP/HCP program.

We also recommend that the City remove the "MOU Remainder" area from consideration by the proposed EIR. Not only are we opposed to further development in this area, but it is premature to evaluate unknown development under CEQA - particularly considering the statement on page 10 of the NOP that indicates that "future residential projects that are consistent with the WRSP could be considered exempt from further environmental review".

We are committed to working with the City of Roseville and Placer County to ensure sustainable development, while protecting important resources in the region. We especially commend the City on its focus on non-automobile-based transportation methods and the use of recycled water for irrigation purposes. Please feel free to contact Dr. Kathleen Dadey at 415-972-3474 if you wish to discuss our comments further.

Sincerely,



Tim Vendilinski,  
Supervisor, Wetlands Regulatory Office

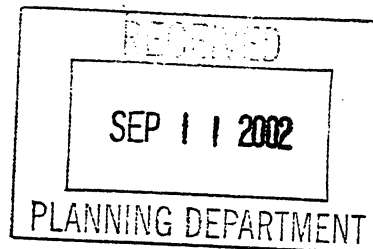
cc:

- U.S. Army Corps of Engineers, Sacramento
- U.S. Fish and Wildlife Service, Sacramento
- National Marine Fisheries Service, Sacramento
- California Department of Fish and Game, Rancho Cordova
- Placer County Planning Department, Lincoln
- Natural Resources Law Group, Sacramento



Flex your power.  
Be energy efficient.

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 3, SACRAMENTO AREA OFFICE  
Venture Oaks -MS 15  
P.O. BOX 942874  
SACRAMENTO, CA 94274-0001  
PHONE (916) 274-0638  
FAX (916) 274-0648  
TTY (530) 741-4509



September 6, 2002

02PLA0105  
SCH #2002082057  
West Roseville Specific Plan/Sphere of Influence  
And Annexation Project  
Notice of Preparation

Ms. Kathy Pease  
City of Roseville Planning Department  
311 Vernon Street  
Roseville, CA 95678

Dear Ms. Pease:

Thank you for the opportunity to review and comment on the West Roseville Specific Plan/Sphere of Influence and Annexation Project. Our comments are as follows:

- Development of the West Roseville Specific Plan will considerably impact Interstate 80 and State Route 65 and associated interchanges. A Traffic Impact Study will be required to access these impacts. The "Guide for the Preparation of Traffic Impact Studies" is enclosed for reference.
- The TIS should incorporate the following scenarios:
  - Existing conditions without the project (current year).
  - Existing conditions plus any proposed phasing of the project.
  - Cumulative conditions (without the project).
  - Cumulative conditions (with project build-out).
- The TIS should provide a Level of Service (LOS) analysis for freeways, ramps and ramp terminal intersections. A merge/diverge analysis should be performed for freeway and ramp junctions, all analysis should be based on AM and PM peak hour volumes. The analysis should include the (individual, not averaged) LOS and traffic volumes applicable to all intersection road approaches and turn movements. The procedures contained in the 1997 Update

to the Highway Capacity Manual along with the Guide for the Preparation of Traffic Impact Studies should be used as a guide for the TIS.

- Mitigation measures should be identified where the project would have a significant impact. Caltrans considers the following to be significant impacts:
  - Off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway.
  - Vehicle queues at intersections that exceed existing lane storage.
  - Project traffic impacts that cause any ramp's merge/diverge Level of Service (LOS) to be worse than the freeway's LOS.
  - Project impacts that cause the freeway or intersection LOS to deteriorate beyond LOS E for freeway and LOS D for highway and intersections. If the LOS is already "E" or "F", then a quantitative measure of increased queue lengths and delay should be used to determine appropriate mitigation measures.

Possible mitigation measures to consider include:

- Widening interchange ramps to increase capacity.
  - Modifying ramp terminal intersections.
  - Adding auxiliary lanes between interchanges.
  - Increasing the ramp acceleration or deceleration lane length to improve merge/diverge operations.
  - Adding signalization and ramp intersection geometric improvements at impacted interchanges.
- The analysis of future traffic impacts should be based on a 20 year planning horizon.
  - Future transportation systems assumed for cumulative conditions should only include those improvements that are included in the most recent approved Placer County Transportation Planning Agency Regional Transportation Plan.
  - The cumulative downstream impacts to the Pleasant Grove Creek and beyond to the Cross Canal are not included in the plan documentation. These impacts should be evaluated. Continued development without mitigation for cumulative impacts in this watershed could adversely impact drainage onto SR-5/99/70.

Ms. Kathy Pease  
September 6, 2002  
Page 2 of 3

bc: Jim Phillips, Hydraulics  
Mel Laraway, Traffic  
Cathy Chapin, Regional Planning

CC/ cc

Ms. Kathy Pease  
September 6, 2002  
Page 3 of 3

Please provide our office with copies of any further action regarding this project. If you have any questions regarding these comments, please contact Cathy Chapin at (916) 274-0640.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Pulverman", with a long horizontal flourish extending to the right.

JEFFREY PULVERMAN, Chief  
Office of Regional Planning

Enclosure

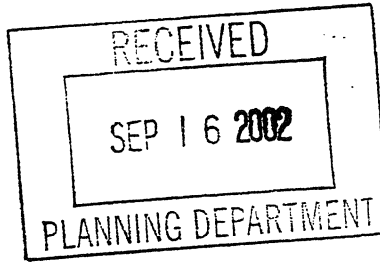
C: Gregoria Garcia, State Clearinghouse



PLACER COUNTY  
TRANSPORTATION  
PLANNING AGENCY

September 13, 2002

Kathy Pease, Administrative Assistant  
Roseville Planning Department  
311 Vernon Street  
Roseville, CA 95678-2649



KATHY SANDS  
City of Auburn  
SHERRIE BLACKMUN  
City of Colfax  
TOM COSGROVE  
City of Lincoln  
MIGUEL UCOVICH  
Town of Loomis  
KATHY LUND  
City of Rocklin  
ROCKY ROCKHOLM  
City of Roseville  
HARRIET WHITE  
TED GAINES  
Placer County  
ROGER IMSDAHL  
Citizen Representative  
CELIA MCADAM  
Executive Director

**RE: Proposed West Roseville Specific Plan/Sphere of Influence & Annexation Project/City-County MOU Amendment Project EIR**

Thank you for the copy of the Notice of Preparation (NOP) and 'scoping' meeting information. I attended the meeting. It was very informative.

**Placer Parkway**

PCTPA will be conducting the environmental review for the Placer Parkway (Parkway). A Parkway overview and a copy of the 2001 Placer Parkway Project Study Report (PSR) are enclosed.

As illustrated in the PSR (Figure 1), segments of two alignments are depicted crossing over the proposed project area.

- 'recommended' alignment – generally southwest to northeast diagonal between Blue Oaks/Watt to Fiddymont
- 'north of Baseline Road' alignment – generally paralleling Baseline to the north and sweeping north – west of Fiddymont

Note, the PSR identified and evaluated several concept alignments. The 'recommended' alignment is subject to change based on the subsequent detailed environmental review. The purpose of selecting a recommended alignment was to help focus the PSR and to improve cost estimates for engineering and environmental studies.

**Environmental Review**

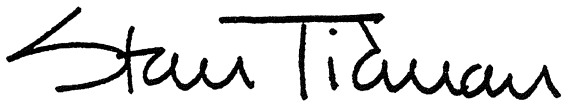
The NOP and the scoping meeting referenced a number of development projects (recently approved, pending approval, and/or anticipated) for western Placer,

northern Sacramento, south Sutter Counties. As the region continues to develop – Parkway alignment options may become more limited with potentially greater environmental/economic impacts. PCTPA does not want to preclude viable Parkway alignments.

The proposed specific plan and MOU-area 'remainder' do not illustrate the PSR's Parkway alignments. The NOP text cites that the EIR will evaluate the traffic impacts with and without the proposed Parkway from SR 65 to SR 99. Watt Ave. options are also to be reviewed.

The City's environmental review should consider a Parkway alignment alternative through the specific plan and the remaining MOU area to analyze its effects. Its cumulative impacts discussion should identify related vicinity regional projects referred to in the NOP including the Parkway. It should summarize the effects of related projects and recommend mitigation measures.

Thank you for including PCTPA in the review process. Please send us a copy of the proposed project's DEIR. If you have any questions, please call me at 530.823.4033.

A handwritten signature in black ink that reads "Stan Tidman". The signature is written in a cursive, slightly slanted style.

Stan Tidman, Senior Planner

Enclosures

Copy: Celia McAdam, Executive Director

## Placer Parkway Overview

---

The Placer Parkway (Parkway) is a proposed approximate 15-mile long, east-west, controlled access highway that would connect rapidly growing areas in western Placer County to planned industrial development in south Sutter County as well as the I-5 corridor. The roadway is planned to connect SR 65 with SR 70/99 in an area between Sunset Boulevard and Baseline Road.

Preliminary studies, a Conceptual Plan (2000) and a Project Study Report (2001), for the proposed Parkway have been completed. Both were based on comprehensive public participation programs and preliminary engineering/environmental background. PCTPA and SACOG Boards adopted both documents.

The PSR assumes a Parkway corridor width ranging between 1,000'- to 2,000'- wide between Fiddymont and Pleasant Grove Roads. This corridor concept is to include and promote vicinity open space features. No interchanges are to be located between Fiddymont and Pleasant Grove Roads.

PCTPA programmed \$4.7 million in FY2002/03 in the 2002 RTIP for the Parkway's environmental review. The proposed Parkway project is included in the Placer County Regional Transportation Plan 2022 (PCTPA 2001). In this document it is cited as a high priority regional roadway. The project was also included the 2002 STIP and SACOG's recently adopted Metropolitan Transportation Plan. In July, the California Transportation Commission allocated this funding. This month, Caltrans authorized PCTPA to proceed.

Earlier this year, the newly formed South Placer Regional Transportation Authority (SPRTA)<sup>1</sup> adopted a \$125 million Regional Transportation and Air Quality Mitigation Fee. New development in the south Placer County area will be assessed over the next 20 years to supplement federal and State funding for regional transportation projects such as the Parkway.

Soon, work will begin on a Tier 1 – Environmental Impact Report/Environmental Impact Statement. It will complete federal and State environmental as well as preliminary engineering requirements to specify a Parkway alignment for right-of-way acquisition. This work may take two to three years to complete.

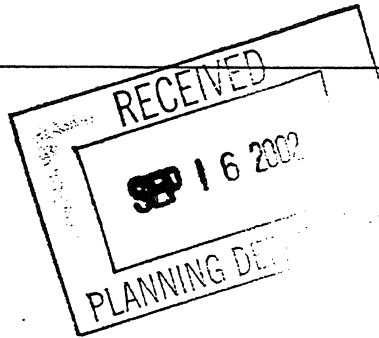
---

<sup>1</sup> Member agencies are the cities of Lincoln, Rocklin, and Roseville along with Placer County and PCTPA.



September 12, 2002

Ms. Kathy Pease, Administrative Analyst  
 Roseville Planning Department  
 311 Vernon Street  
 Roseville, CA 95678



**RE: NOTICE OF PUBLIC SCOPING MEETING AND NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED WEST ROSEVILLE SPECIFIC PLAN/SPHERE OF INFLUENCE AND ANNEXATION PROJECT, AND CITY/COUNTY MEMORANDUM OF UNDERSTANDING (MOU) AREA SPHERE OF INFLUENCE AMENDMENT ENVIRONMENTAL IMPACT REPORT (PROJECT)**

Dear Ms. Pease:

Staff of the Sacramento Metropolitan Air Quality Management District (Sacramento District) appreciates the opportunity to review and comment on the NOP for the project referenced above. This is a very significant project not only for Roseville and Placer County, but also for the greater Sacramento federal ozone non-attainment area.

Placer County and the surrounding region, including Sacramento, El Dorado, South Sutter, and Yolo-Solano Counties, have been designated by the Federal Environmental Protection Agency (EPA) as a "severe" non-attainment area for ozone. This classification is due to recurrent exceedances of the health based air quality standards of the Federal Clean Air Act. The recent "Spare The Air" advisories and "Health Advisories" issued in August, 2002, due to repeated exceedances of the federal ozone standard, are indicative of the air pollution problems facing the region.

The 1994 State Implementation Plan (SIP) requires that the Federal Non-attainment Area achieve "attainment" by 2005. While it is unlikely that large areas within the Project area will be developed in the next three years, it is important to recognize that when development does occur, construction and operational emissions resulting from new development will play an important role in the area's ability to achieve, and then maintain, attainment.

SACOG used the adopted General Plans of local agencies within the non-attainment area to estimate future population and employment. Using the information developed by SACOG, local air districts were able to estimate emissions from land development projects. The DEIR should compare the existing and proposed land use plans to determine if the population and employment estimates used by SACOG for the project area, and the resulting impacts on air quality, are consistent with the SIP. If the emissions generated by population and employment increases in the project area were not included in the SIP, the region's ability to meet federally approved clean air standards could be threatened.

For areas under the jurisdiction of Sacramento County, where adequate population and employment growth factors were included in the SIP, a 15 percent emissions reduction is required to mitigate the impact of significant projects. In the City of Sacramento, the North Natomas Community Plan requires a 35% reduction in emissions, and this area was designated for urban development when SACOG prepared

population and employment estimates for the SIP. If development does occur in the project area, which was not programmed for development in the General Plan in place at the time our region's SIP was developed, we recommend the following mitigation strategies:

1. The NOP indicates that the DEIR proposed for this project will address only the area covered by the West Roseville Specific Plan, and that the area covered by the "MOU" will be addressed in a subsequent environmental analysis. The Sacramento District strongly objects to this approach, since it will not fully assess the impacts to be expected from this project at buildout. We recommend that the City establish land uses for the MOU area as part of this project and include them in the DEIR. Appropriate mitigation measures for the entire project area, as well as for areas outside the project area that will be impacted, should be included in the DEIR.
2. Construction emissions contribute significantly to the ozone problem in the area, particularly since the peak construction season coincides with the peak ozone season. The Draft EIR should include the attached measures to mitigate emissions from heavy-duty diesel-powered off-road construction equipment. These or similar measures have been required by the County of Sacramento for a variety of land use development projects and several road construction projects, as well as by CalTrans District 3 for road and bridge widening projects.
3. We recommend that the Roseville City Council establish a Special Service Area (Local Improvement District) to provide a funding mechanism for a Transportation Management Association (TMA). The intent of creating a TMA is to provide a means to achieve quantifiable emissions reductions from operational mobile source emissions that can be used to demonstrate consistency with the regional SIP.
4. The TMA should include all of the following measures, at a minimum:
  - The TMA by-laws should include a provision requiring that the Air Pollution Control Officer for the Placer County Air Pollution Control District serve as a member of the TMA Board of Directors.
  - The TMA by-laws should include a provision requiring that the TMA provide an annual report to the Board of Directors of the Placer County Air Pollution Control District. The purpose of this annual report is to quantify the emissions reductions achieved, and demonstrate that the emissions reductions support commitments made in the SIP.
  - A shuttle service to provide transportation for employees, to supplement any existing or future public transit in the area.
  - Subsidize the payment of fares or expenses for employees, as an incentive for them to use some form of transit/carpooling/vanpooling.
  - Provide a guaranteed ride home program for employees who commute to work via transit/carpool/vanpool and, on occasion, are not able to stay at work due to illness or having to work overtime.

- Provide a carpool/vanpool matching service to facilitate the employees' ability to find a convenient alternative to commuting in a single occupant vehicle.
5. Require an Air Quality Mitigation Plan (AQMP), for approval by the Placer County APCD Air Pollution Control Officer, for each project in the Plan Area that achieves a 35% reduction in operational emissions, by:
    - Demonstrating compliance with the project's approved emission mitigation measures.
    - Including a Transportation Demand Management Plan, quantifying the effectiveness of emissions reductions achieved by the TMA.
    - Indicating and quantifying all other mitigation measures needed to achieve a 35% emission reduction.
  6. If project developers cannot feasibly achieve the required construction and/or operational emission reductions, we recommend that they be required to participate in the Placer County Air Pollution Control District off-site air quality mitigation program.
  7. Development of the project area will have a significant impact on Highways 80 and 65, both of which are already demonstrating severe traffic congestion. The DEIR should address the cumulative impacts of additional traffic resulting from the development of this project, and propose measures sufficient to mitigate the traffic impacts.

Should you have any questions regarding these comments, please contact me at (916) 874-4885 or [pstafford@airquality.org](mailto:pstafford@airquality.org).

Sincerely,



Phil Stafford  
Associate Air Quality Planner

cc: Tom Christofk, APCO –Placer County APCD  
Dave Vintze, Placer County APCD  
Tim Taylor, Division Manager, Mobile Source Division  
Ron Maertz, Transportation and Land Use Coordinator, SMAQMD



## SMAQMD RECOMMENDED MITIGATION FOR REDUCING EMISSIONS FROM HEAVY-DUTY CONSTRUCTION VEHICLES

Revised January 17, 2002

### *Category 1: Reducing NOx emissions from off-road diesel powered equipment*

The project shall provide a plan for approval by the City of Roseville and Placer County APCD demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction<sup>1</sup> compared to the most recent CARB fleet average; and

The project representative shall submit to the City of Roseville and Placer County APCD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide Placer County APCD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

*and:*

### *Category 2: Controlling visible emissions from off-road diesel powered equipment*

The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity shall be repaired immediately, and the City of Roseville and Placer County APCD shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The Placer County APCD and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supercede other Placer County APCD or state rules or regulations.

<sup>1</sup> Acceptable options for reducing emissions may include use of late model vehicles, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.



Jack Meers  
417 Roan Ct.  
Roseville, CA 95747

August 24, 2002

AUG 27 2002

City of Roseville  
Planning Department  
311 Vernon St.  
Roseville, CA 95678

ATTN: Kathy Pease

RE: West Roseville Specific Plan, Environmental Impact Report

Dear Planning Commission,

This is to express my views opposing the development of the West Roseville Specific Plan as currently stated. The development of this project would have a serious adverse impact on the surrounding areas already developed.

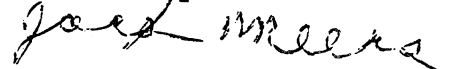
First and foremost would be the greatly increased traffic flow caused by the development of 8430 residences plus over 200 units of industrial and commercial development. Anyone who has been in the vicinity of Baseline and Fiddymont Roads at commute time has been witness to the fact of how heavy the traffic flow through this area already is. The additional traffic flow caused by this development would bring negative traffic flow to intolerable levels.

Co-existing with this greatly increased traffic flow would be the increased smog that more cars bring. Placer County is already one of the smoggiest areas in the state.

Lastly, I question the availability of water to the new development. If water becomes available it would most likely have to come from building additional facilities. Would all of the cost of the added facilities be borne by the developers as it almost never is ?

Thank you for your consideration of my views regarding the West Roseville Specific Plan.

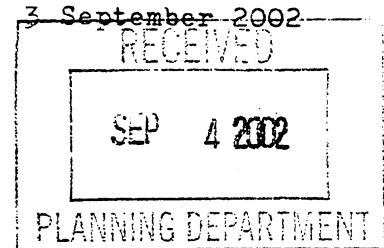
Sincerely,



Jack Meers



Ms. Kathy Pease  
City of Roseville Planning Dept.  
311 Vernon Street  
Roseville, CA 95678



Dear Ms. Pease,

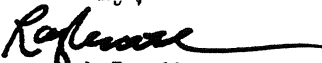
I recently received a "Project Update" on a West Roseville Specific Plan.

As a 3-year resident of Sun City, owning a home along Fiddymint Road north of Pleasant Grove Blvd., I have experienced with a good deal of frustration the ever increasing traffic noise level along Fiddymint largely due to truck traffic coming from Phillip Road in conjunction with the construction of the Wastewater Treatment Plant. And now I must read with great dismay about the WRSP project planned west of Fiddymint Road.

This to me represents just another instance of unnecessary urban encroachment with a concurring increase of noise and air pollution, increased water consumption, and a dramatic decline of green belt scenery.

I sincerely hope that a negative Environmental Impact Report will delay such a project for a long, long time.

Sincerely,

  
Raymond L. Moore

7227 Timberrose Way  
Roseville, CA 95747-8132





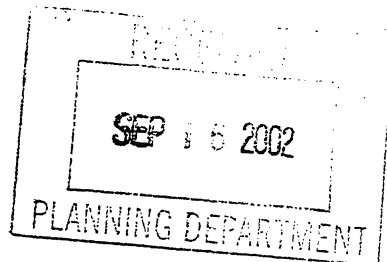
***Pacific Gas and  
Electric Company***

**Robert J. Fratini**  
Community and  
Governmental Relations

151 North Sunrise Avenue, Room 513  
Roseville, CA 95661

September 12, 2002

Kathy Pease, Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, CA 95678



Dear Ms. Pease:

Re: Comments on Notice of Preparation of an Environmental Impact Report for the  
Proposed West Roseville Specific Plan

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the City of Roseville's Notice of Preparation of an Environmental Impact Report for the Proposed West Roseville Specific Plan, Sphere of Influence and Annexation Project and City/County Memorandum of Understanding Area Sphere of Influence Amendment Environmental Impact Report ("Notice").

The Notice correctly indicates that the area proposed to be annexed to the City is within PG&E's electric and gas service area. The Notice goes on to state, however, that "it is proposed that Roseville Electric would provide electric service to the WRSP project area" (page 20) and that among the project approvals to be obtained are "[p]otential amendments of public utility service area boundaries" (pages 9 – 10).

Please be aware that PG&E is currently providing electric service to a number of customers in the project area. PG&E has an indeterminate franchise from Placer County and a Certificate of Public Convenience and Necessity (CPCN) from the California Public Utilities Commission entitling PG&E to exercise its Placer County franchise rights. Although the CPCN excludes certain portions of Placer County served by the City of Roseville, the Sacramento Municipal Utility District and the Sierra Pacific Power Company, the exclusion is for the portions of Placer County then being served, such that annexation by the City does not affect PG&E's right or obligation to continue to provide electric service in the annexed area. Thus, if the City does annex the project area, electric customers in the project would have a choice of electric providers.

Kathy Pease  
September 12, 2002  
Page 2

PG&E not surprisingly also has a number of overhead electric lines, both main and tap circuits, that we will continue to use to reliably serve existing and future customers both within and outside the project boundary. Although not an environmental issue per se, please note that the cost of any work PG&E is asked to perform work on our facilities to accommodate the project will be the responsibility of the requesting party.

Please let me know if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Robert J. Hutton". The signature is written in black ink and is positioned above the typed name "Robert J. Hutton".

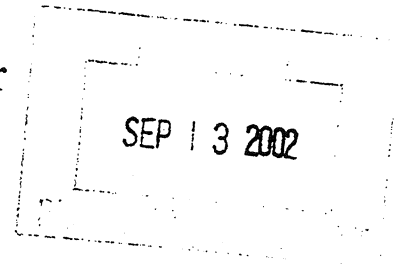
RJF:llg

cc: Mr. Allen Johnson  
Ms. Patty Dunne



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Sacramento Fish and Wildlife Office  
2800 Cottage Way, Room W-2605  
Sacramento, California 95825-1846



IN REPLY REFER TO:  
1-1-02-TA-3227

September 13, 2002

Ms. Kathy Pease  
Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, California 95678

Subject: Review of the Notice of Preparation (NOP) for the Environmental Impact Report for the Proposed West Roseville Specific Plan, Sphere of Influence and Annexation Project, Placer County

Dear Ms. Pease:

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Preparation (NOP) for the Environmental Impact Report for the Proposed West Roseville Specific Plan (WRSP), dated August 16, 2002. The Service received the NOP on August 27, 2002. This response is in accordance with section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*)(Act).

The Service is greatly concerned over the amount of resources potentially effected as a result of implementing proposed development within the WRSP and remaining areas. Development within the approximately 5,520 acre planning area would greatly affect wetland and grassland resources within western Placer County. The WRSP area includes the Westpark and Fiddymment Ranch proposed developments. The proposed Westpark/Fiddymment development alone includes over 63 wetted acres of vernal pools, swales, seasonal wetlands, and emergent marsh. Vernal pools, swales, and other ephemeral wetland areas provide habitat for the threatened vernal pool fairy shrimp (*Branchinecta lynchi*) and the endangered vernal pool tadpole shrimp (*Lepidurus packardii*).

The Service, along with the other resource agencies, U.S. Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (Corps), National Marine Fisheries Service (NMFS) and the California Department of Fish and Game (CDFG) have been discussing the proposed annexation and development project with the proposed developers and the City of Roseville (City) for over a year. The agencies have also been working with Placer County in developing a Habitat Conservation Plan (HCP) and a Natural Communities Conservation Plan (NCCP) for

Placer County. In August 2000, the Service entered into a Memorandum of Understanding (MOU) with the City to limit the effects of increased growth as a result of development of the Pleasant Grove Waste Water Treatment Plant. Conditions within the MOU outline the City's responsibility to develop a long-term HCP or its equivalent and to develop an interim conservation strategy for lands within the City's jurisdiction. Although portions of the annexation are not included in the MOU, the Service feels that any development authorized by the City should be consistent with measures outlined in the MOU for the conservation of the natural resources in Placer County.

The WRSP has identified open space areas where conservation of vernal pool, wetland, riparian, and grassland ecosystems are to be preserved. We feel that these areas are entirely inadequate to protect listed vernal pool crustaceans. The Service strongly recommends that conservation efforts within the WRSP and adjacent planning area include the following:

- Conservation areas should be consistent, compliment, and be compatible with the regional conservation planning efforts for Placer County.
- Provide for the long-term survival and recovery of listed vernal pool species.
- Vernal pool ecosystems should be conserved at a landscape level and include adjacent upland areas which are essential in maintaining watershed and hydrologic functioning of the pools.
- Areas surrounding vernal pools, listed vernal pool crustacean habitats, and riparian areas should be large enough to limit indirect effects.
- Access to conservation areas should not include roadways or trails to discourage dumping and other disturbances resulting from human impacts.
- Development shall not preclude the development of a viable HCP/NCCP for Placer County.
- Modify the WRSP project design to limit impacts to areas which have less effects on vernal pool and grassland landscapes within the area.

It is the regional policy of the Service to ensure no net loss of wetland acreage or value, whichever is greater. To offset unavoidable resource losses for acceptable projects, the Service recommends that appropriate conservation of the resources be provided. The Council on Environmental Quality regulations for implementing the National Environmental Policy Act define mitigation to include: (1) avoiding the impact; (2) minimizing the impact; (3) rectifying the impact; (4) reducing or eliminating the impact over time; and (5) compensating for impacts. The Service supports and adopts this definition of conservation and considers the specific elements to represent the desirable sequence of steps in the conservation planning process. Accordingly, we maintain that the best way to compensate for adverse biological impacts is to avoid them altogether.

The WRSP and adjacent planning area is within the Southeastern Sacramento Valley vernal pool region identified by the California Department of Fish and Game in their Preliminary Vernal Pool Assessment Report (Keeler-Wolf *et al.* 1998). This region contains almost 14 percent of all vernal pools remaining within California's Central Valley (Holland 1998). The Southeastern Sacramento Valley Vernal Pool Region also comprises a significant portion of the ranges of the federally-listed vernal pool crustaceans. The region contains 20 percent of the known occurrences of vernal pool fairy shrimp and 42 percent of the known occurrences of vernal pool tadpole shrimp [Natural Diversity Database (NDDB) 2001]. Vernal pool habitats in this region are essential for the conservation of these species because they include a variety of habitat types, including the extremely rare northern volcanic mudflow vernal pools, as well as high terrace vernal pools on upper stream terraces, and low terrace vernal pools along the lower alluvial basins. Since the vernal pool tadpole shrimp and vernal pool fairy shrimp were federally listed in 1994, 70 percent of all vernal pool destruction documented by the Service occurred in the Southeastern Sacramento Valley Vernal Pool Region.

Placer County contains almost 35 percent of all vernal pools within the Southeastern Sacramento Vernal Pool Region. As of 1994, Holland estimated that over 48,000 acres of vernal pool grasslands remained in Placer County. Widespread urban development has eliminated many of these habitats. In 2001, Glazner mapped 20,676 acres of vernal pool grasslands remaining in the county. Approximately 2,146 acres are contained within established preserve areas and another 3,946 acres are currently within the proposed City of Roseville Annexation area and Placer Vineyards project area. Combined with other proposed development and highway projects, there is the potential for an additional loss of over 5,000 acres of vernal pool habitats from Placer County. These projects would also significantly fragment and isolate remaining habitat areas from one another. The WRSP occupies a central portion of the last remaining large, contiguous vernal pool grasslands in Placer County. The protection of such areas is essential to the conservation of the vernal pool fairy shrimp, as well as to the larger vernal pool landscape.

Placer County is in the process of developing a HCP under section 10(a)(1)(B) of Act, and a NCCP under the State of California's Natural Community Conservation Planning Act of 1991. The proposed project is within the Phase I planning area of the Placer County HCP/NCCP. Development of the project site as proposed could preclude Placer County's ability to develop a regional conservation strategy. The habitat present within the WRSP is regionally significant not only in terms of conservation value for the federally-listed vernal pool fairy shrimp and tadpole shrimp, but also in terms of its potential long-term ability to support a high diversity of sensitive species. Efforts should be made to protect the majority of the WRSP area due to the relatively large extent of habitat, proximity to other fish and wildlife habitat, and value as a landscape link.

The Service is committed to working with the City and Placer County in development of a viable HCP/NCCP for the county and would like to thank you for the opportunity to comment on this NOP. The Service requests that a copy of any future Environmental Impact Reports or similar documents be provided to this office.

Ms. Kathy Pease

4

If you have any questions about these comments on the West Roseville Specific Plan, please contact Arnold Roessler at (916) 414-6645 or Lori Rinek at (916) 414-6492.

Sincerely,



Jan C. Knight

Chief, Endangered Species Division

cc:

Environmental Protection Agency, San Francisco, CA (Attn: Ms. Kathy Dadey)

National Marine Fisheries Service, Sacramento, CA (Attn: Ms. Kelly Finn)

U.S. Army Corps of Engineers Sacramento, CA (Attn: Mr. Tom Cavanaugh)

California Department of Fish and Game, Rancho Cordova, CA (Attn: Mr. Jeff Finn)

State Water Resources Control Board, Sacramento, CA (Attn: Gary Carlton)

Placer County Planning Department, Auburn, CA (Attn: Mr. Loren Clark)

### REFERENCES CITED

- California Natural Diversity Data Base. 2002. Natural Heritage Division. California Department of Fish and Game, State of California.
- Glazner, J. 2001. GIS coverage of vernal pools prepared for Placer County and Placer Legacy, Auburn, California.
- Holland, R. F. 1998. Great Valley vernal pool distribution, photo revised 1996. Ecology, Conservation, and Management of Vernal Pool Ecosystems. Proceedings of the California Native Plant Society Conference, 1996. Sacramento, California.
- Keeler-Wolf, T., D. R. Elam, K. Lewis and S.A. Flint. 1998. California Vernal Pool Assessment. Preliminary Report. California Department of Fish and Game, Sacramento, California.





**SIERRA  
CLUB**  
FOUNDED 1892

**MOTHER LODGE CHAPTER**  
1414 K STREET, SUITE 500  
SACRAMENTO, CA 95814  
TEL. (916) 577-1100 x108  
FAX: (916) 557-9669  
motherlodge@sierraclub-sac.org  
www.motherlodge.sierraclub.org

September 16, 2002

*Delta Sierra Group*  
Kathy Pease  
Roseville Planning Dept.  
311 Vernon Street  
Roseville, CA 95678

*Delta Sierra Group* **Re: Notice of Preparation for the Draft Environmental Impact Report for the West Roseville Specific Plan**

*Delta Sierra Group* Dear Ms. Pease,

*Delta Sierra Group* Please accept these comments on the NOP for the DEIR for the West Roseville Specific Plan. We believe that the DEIR should address the following issues.

*Delta Sierra Group*

*Delta Sierra Group* 1) The growth inducing impacts of urban growth north of Baseline Road and west of Fiddymont Road will have major growth-inducing impacts in a hitherto undeveloped agricultural part of the county.

*Delta Sierra Group*

*Delta Sierra Group* 2) The cumulative impacts of the WRSP need to be examined in terms of the loss of open space, the loss of farmland, the loss of vernal pool resources, and worsening air quality.

*Delta Sierra Group*

*Delta Sierra Group* 3) The need to expand the Roseville Sphere of Influence and amend the city's General Plan must be documented. What residential and commercial needs cannot be met by existing General Plans? Placer Vineyards is already slated for 14,000 homes and 6.7 million square feet of industrial and commercial development under the Placer County General Plan. Is that not adequate to meet anticipated demand in the western portion of the county in the near future?

*Delta Sierra Group*

*Delta Sierra Group* 4) Placer County is currently creating a Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP). It is incumbent upon the City of Roseville that it not compromise the conservation strategy of the HCP/NCCP. Given the fact that the WRSP is proposing residential development immediately adjacent to important vernal pool resources, how is the City respecting the integrity of the HCP/NCCP process?

*Delta Sierra Group*

*Delta Sierra Group* 5) The DEIR must analyze a full range of alternatives. In addition to a No Project alternative, these should also be examined:

*Delta Sierra Group*

*Delta Sierra Group* a. The substitution of similar growth in infill locations within the existing Sphere of Influence.

*Delta Sierra Group*

*Delta Sierra Group* b. An environmentally superior design in which WRSP area is reduced, with its western boundary not extending beyond the north/south line formed by the eastern edge of the Pleasant Grove Wastewater Treatment Plant (W WTP) and Phillip Rd.

*Serving 24 counties in Northern and Central California*

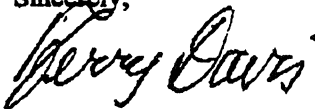
Alpine - Amador - Butte - Calaveras - Colusa - El Dorado - Glenn - Lassen - Modoc - Nevada - Placer - Plumas  
Sacramento - San Joaquin - Shasta - Sierra - Siskiyou - Solano - Stanislaus - Sutter - Tehama - Tuolumne - Yolo - Yuba

Comments on WRSP NOP  
Mother Lode Chapter Sierra Club  
September 16, 2002  
Page 2 of 2

c. An additional alternative should have a greater portion of the WRSP designated for high and medium density development clustered adjacent to existing development near Hiddymont Road, while Low Density Residential is reduced to provide for a substantial increase in set backs from vernal pool resource areas, necessary to capture adjacent grasslands required for pollination of sensitive plant species, and to provide foraging habitat for Swainson' hawks.

Thank you for the opportunity to comment on the NOP. Please send me the DEIR and any related documents as they become available, as well as any public notices concerning the WRSP.

Sincerely,



Terry Davis  
Conservation Coordinator  
Mother Lode Chapter  
Sierra Club

*Serving 24 counties in Northern and Central California*

Alpine - Amador - Butte - Calaveras - Colusa - El Dorado - Glenn - Lassen - Modoc - Nevada - Placer - Plumas  
Sacramento - San Joaquin - Shasta - Sierra - Siskiyou - Solano - Stanislaus - Sutter - Tehama - Tuolumne - Yolo - Yuba



**PLACER COUNTY  
DEPARTMENT OF PUBLIC WORKS**

Tim Hackworth, Director  
Ken Greim, Assistant Director  
Rick D'Andro, Deputy Director  
Wes Zicker, Deputy Director

September 13, 2002

Kathy Pease  
Planning Department  
City of Roseville  
311 Vernon Street  
Roseville, CA 95678

**SUBJECT: NOTICE OF PREPARATION; WEST ROSEVILLE SPECIFIC PLAN;  
FIDDYMENT ROAD AND PLEASANT GROVE BOULEVARD; APN 017-010-  
009, -010, -021, -034, -035, -036, -040, -043, & -044, 017-015-003 & -037**

Dear Ms. Pease:

Thank you for the opportunity to review the subject Notice of Preparation (NOP) for the West Roseville Specific Plan (Specific Plan). The Placer County Department of Public Works (DPW) would like to offer the attached comments for your consideration. There may be items that the City can provide additional clarification on that would eliminate some of the attached comments.

We request that the City include the Placer County DPW on the list of responsible and interested agencies for review of both the project level EIR and program level documents. We reserve the right to comment further once the City of Roseville has prepared subsequent drafts.

If you have any questions or concerns regarding these comments, please do not hesitate to call Mr. David Price at (530) 889-7498.

Sincerely,

COUNTY OF PLACER  
DEPARTMENT OF PUBLIC WORKS  
T. D. HACKWORTH, DIRECTOR

DAVID W. PRICE, P.E.  
ASSOCIATE CIVIL ENGINEER

kbr-D:\Data\Dwp\Civic Design\129-59

Attachment: Notice of Preparation Comments

**COUNTY OF PLACER  
DEPARTMENT OF PUBLIC WORKS  
NOTICE OF PREPARATION COMMENTS**

1. The Project level EIR addressing the proposed Specific Plan should include analyses of impacts to the floodplains downstream of the plan area (within the County). Impacts to structures and facilities downstream should be identified and mitigated as well. There are three roadways downstream that are of primary concern to the DPW at this time: Pettigrew Road, Brewer Road and Country Acres Lane.
2. The Program EIR for the Memorandum Remainder Area should also discuss impacts to floodplains, and recommend that further studies, as appropriate, be included in the environmental documents for individual development entitlements within this area. To the extent that the Program EIR is to be used to address construction of roadways, bikeways/trails and utilities, this document should analyze specific impacts to floodplains resulting from such construction. This also would be true of any development within the Remainder Area which the City is proposing to exempt from further CEQA analysis. To the extent that project specific impacts are proposed not to be analyzed in a subsequent document, the Program EIR should address project level impacts which may be significant.
3. The EIR's addressing this proposal should include analysis of all off-site construction necessary to serve the uses in the Plan Area. The County is concerned with those utility extensions which would occur within areas under the County's jurisdiction. In addition, mitigations generated by the EIR's, which could create impacts within the County (e.g. improvements to County roadways, etc.), should be fully analyzed.
4. Any easements necessary, which may impact County right-of-way or individual properties within the County, should be analyzed. Impacts to property due to encumbrances of this sort should be disclosed and mitigations proposed. Impacts to existing easements resulting from build-out of the plan area should be evaluated as well.
5. The second full paragraph on Page 10 of the NOP includes a proposal to exempt future residential projects, presumably within the Memorandum Remainder Area, from further environmental review if those projects are consistent with the Specific Plan. The program level EIR should include analyses of any impacts due to construction of projects (project level) consistent with the WRSP within the Memorandum Remainder Area. The project specific impacts of these projects must be disclosed pursuant to CEQA and if the City desires to avoid further review in the future, the project level discussion should be included in the Memorandum Remainder Area EIR or in a subsequent document which analyzes such project specific impacts. Generally speaking, if the City desires to avoid further environmental review over some portion of the Memorandum Remainder Area, a more detailed description of the land uses proposed, or expected, within this area should be provided with the EIR and should form the basis for analysis of impacts associated with the proposal.
6. The development of the West Roseville Specific Plan (WRSP) and MOU Remainder Area will result in the need for additional roadway capacity to serve the area. We feel that it is important that the EIR evaluate a number of land use and transportation roadway network alternatives to comprehensively evaluate roadway infrastructure needs within the

region. This should include sufficient analysis of the "MOU Remainder" areas in order to ensure that potential impacts and mitigations are accurately disclosed and mitigated.

7. We believe it is appropriate for the WRSP EIR to address cumulative impacts utilizing the latest DKS Placer County model under a year 2020 and 2025 scenario. This model will be utilized in updating the South Placer Regional Transportation Authority (SPRTA) regional fee analysis and should be used for the WRSP EIR to remain consistent with the regional fee efforts. Prior to commencing with the traffic model runs, individual jurisdictions should be contacted to confirm future land use scenarios. Specifically, Placer County requests the City consult with the County to develop traffic model scenarios to include reasonable development levels for Placer Vineyards as well as supporting roadway infrastructure assumptions (e.g., with and without Placer Parkway). We suggest a focused meeting with City staff and our Public Works/Transportation and Planning staff to discuss appropriate scenarios and assumptions. This meeting should be coordinated through the County's Planning Department.
8. Specific impacts and mitigations need to be identified for Baseline Road and Walerga Road within the unincorporated County. The EIR should address the potential for these roadway improvements to be included in the SPRTA Regional Fee structure or other fee program.
9. The EIR analysis should also identify specific increases in traffic volumes on other Placer County roadways, including Fiddymont Road, Watt Avenue, P.F.E. Road and Cook-Riolo Road.
10. The EIR should address impacts on existing 2-lane roadways, such as Phillip Road, Brewer Road and Fiddymont Road (north of Blue Oaks Boulevard). The EIR needs to address the level of WRSP traffic that would use these roadways and identify mitigation measures. The results of this analysis should be used to refine the WRSP roadway infrastructure to minimize impacts to these roads.
11. The EIR should include an analysis of transit in the area, including the potential to coordinate with both Placer County and Regional Transit to provide comprehensive service within the area. With the expansion of urbanized development adjacent to the Watt Avenue corridor, consideration should be given to securing sufficient right-of-way on or adjacent to Watt Avenue to accommodate the potential for future transit services such as Rapid Bus service.





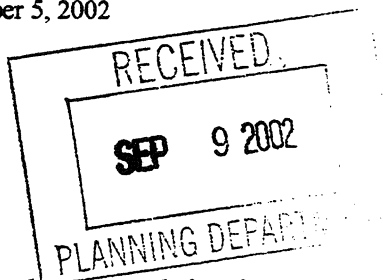
# GRANITE BAY COMMUNITY ASSOCIATION

P.O. BOX 2704 ★ GRANITE BAY, CALIFORNIA 95746 ★ (916) 791-7427

September 5, 2002

Ms. Kathy Pease  
Planning Department, City of Roseville  
311 Vernon Street  
Roseville, CA 95678

SANDRA HARRIS  
ISSUES COORDINATOR



Re: NOP - West Roseville Specific Plan

Thank you for the opportunity to provide comments and recommendations in response to the NOP of a draft EIR for this proposed project. In general, we expect the proposed EIR to identify present environmental conditions, characteristics of the proposed project, impacts the proposed project will have on the environment, impacts the proposed project will have regionally, identification of and the environmental impacts of several project alternatives, along with specific means of avoiding or mitigating various impacts.

The following identifies our specific recommendations for particular subjects:

1. Public Services and Utilities
  - a. Present status and statistics relating to availability and capability of Roseville to provide water for the project.
  - b. Include a water history for Placer County going back more than 100 years.
  - c. Document the availability of water in a draught cycle lasting for 3, 5, and 10 years.
  - d. Identify water sources available to the project exclusive of purchasing water from the San Juan Water District.
2. Traffic and Transportation
  - a. Describe current and proposed transportation conditions in South Placer by identifying and mapping roads, mass transit routes or facilities, and trails.
  - b. Establish current levels of service and traffic volumes in the entire South Placer region.
  - c. Describe how the project will alter existing traffic conditions by calculating the degree of impact to the entire South Placer region.
  - d. Describe the impact of added "lake traffic" on Douglas Boulevard and Auburn-Folsom Road.
3. Air Quality
  - a. Current data on existing air quality levels and pollution sources should be included.
  - b. A description of how the project will alter the existing air quality. Include calculations portraying the degree of impact on all of Placer County.
4. Schools and Recreation
  - a. The present status and statistics relating to the existing schools and recreation facilities, should be identified and charted.
  - b. Describe how the new schools will be funded without relying on school bonds or existing residents to pay for them.
  - c. Describe the impact to Folsom Lake State Park Recreation area.

Thank you for considering our concerns and recommendations

Very truly yours,

Sandra H. Harris, Secretary  
Granite Bay Community Association

cc: Granite Bay MAC



**TRUSTEES**

ROBERT SCHEIBER  
RICHARD F. TARESH  
ROY C. OSTERLI II  
WILLIAM P. HUDSON  
JAMES L. SPANGLER

**OFFICERS**

WILLIAM P. HUDSON, PRESIDENT  
ROY C. OSTERLI II, VICE PRESIDENT  
DONALD WHITE, SEC. - MANAGER

OFFICE OF

**BOARD OF TRUSTEES OF  
RECLAMATION DISTRICT No. 1001**

1959 CORNELIUS AVENUE  
RIO OSCO, CALIFORNIA 95674  
530 656-2318 or 530 633-2586  
FAX 530 656-2185

September 13, 2002

Kathy Pease, Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, California 95678  
By FAX: (916) 774-5129

**Subject:** West Roseville Specific Plan, /Sphere of Influence and Annexation  
Project, and City/County Memorandum of Understanding (MOU) Area  
Sphere of Influence, Amendment Environmental Impact Report.

The change of nine square miles from agriculture to urban land use has the potential to cause several adverse impacts on Reclamation District 1001 facilities. Primarily:

- The increase in the number of small flood events;
- Sedimentation deposits in the District facilities from increased erosion of the stream channels; (Increases in the mean annual flood events will cause channel changes)
- Increases in storm water peak flows;
- Increases in the storm water runoff volume;
- Increase the pollution levels within the District facilities;
- Increase in the potential to flood the "Triangle Area" in Sutter County and
- Increase in the potential to flood the "Sankey Gap".

Thank you for the opportunity to comment on this at this early stage of planning.



Fred Barnett  
For RD 1001

CC: Don White Manger RD 1001  
Mary Keller Sutter County, Brian Keating Placer County Flood Control District



# Placer County Water Agency

Business Center: 144 Ferguson Rd. • Mail: P.O. Box 6570 • Auburn, California 95604-6570  
(530) 823-4850 800-464-0030 TDD (530) 823-4966



A Public Agency

## BOARD OF DIRECTORS

Pauline Roccucci • Alex Ferreira  
Otis Wollan • Lowell Jarvis  
Michael R. Lee  
David A. Breninger, General Manager  
Ed Tiedemann, General Counsel

August 28, 2002

Kathy Pease, Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, CA 95678

AUG 29 2002

Re: Placer County Water Agency Comments in Response to the NOP of an EIR for the Proposed West Roseville Specific Plan

The City of Roseville (City) currently has agreements in place with the Placer County Water Agency (Agency) which provide for a supply of surface water from the Agency's Middle Fork American River Project (MFP) to meet the future water supply needs of the City. At the present time the City has a contract for the delivery of 10,000 acre feet per year and the option to enter into contracts for the delivery of up to an additional 20,000 acre feet per year.

The Water Forum Agreement, to which both the City and the Agency are signatories, provides certain conditions in regards to the increased use of MFP water. The Agency continues to support the Water Forum Agreement and believes that the conditions set forth should be included as constraints to the use of MFP water for the proposed project.

The Agency and the City are working cooperatively on the Placer-Sacramento Regional Water Supply Project, which will evaluate the alternatives to increase the surface water deliveries to both the City's and the Agency's service areas. The alternatives will include a new diversion from the Sacramento River as the likely proposed project. Implementation of this proposed project will be subject to an extensive federal feasibility study and EIS/EIR and ultimately the execution of an agreement between the Agency and Reclamation regarding the transfer and/or exchange of water rights between the American and Sacramento Rivers.

The Agency will continue to have an interest in insuring that its water supply entitlements are being used efficiently and being put to the highest and best use.

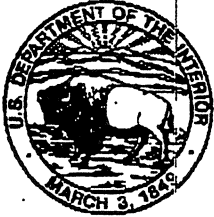
The proposed City annexation area is currently within the Agency Zone No. 5. This service zone was established by the Agency exclusively as an agricultural zone and no commitments of water by the Agency for agricultural use can be transferred to any other use. And the conversion of land within Zone 5 from agricultural use to urban use requires that the land be detached from Zone 5 by the Agency.

Sincerely,  
PLACER COUNTY WATER AGENCY

Einar L. Maisch,  
Director of Strategic Affairs

c: David Breninger  
Pauline Roccucci





# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office  
2800 Cottage Way, Room W-2605  
Sacramento, California 95825-1846

IN REPLY REFER TO:  
1-1-02-TA-3227

September 13, 2002

Ms. Kathy Pease  
Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, California 95678

**Subject:** Review of the Notice of Preparation (NOP) for the Environmental Impact Report for the Proposed West Roseville Specific Plan, Sphere of Influence and Annexation Project, Placer County

Dear Ms. Pease:

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Preparation (NOP) for the Environmental Impact Report for the Proposed West Roseville Specific Plan (WRSP), dated August 16, 2002. The Service received the NOP on August 27, 2002. This response is in accordance with section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*)(Act).

The Service is greatly concerned over the amount of resources potentially effected as a result of implementing proposed development within the WRSP and remaining areas. Development within the approximately 5,520 acre planning area would greatly affect wetland and grassland resources within western Placer County. The WRSP area includes the Westpark and Fiddymont Ranch proposed developments. The proposed Westpark/Fiddymont development alone includes over 63 wetted acres of vernal pools, swales, seasonal wetlands, and emergent marsh. Vernal pools, swales, and other ephemeral wetland areas provide habitat for the threatened vernal pool fairy shrimp (*Branchinecta lynchi*) and the endangered vernal pool tadpole shrimp (*Levinsur packardii*).

The Service, along with the other resource agencies, U.S. Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (Corps), National Marine Fisheries Service (NMFS) and the California Department of Fish and Game (CDFG) have been discussing the proposed annexation and development project with the proposed developers and the City of Roseville (City) for over a year. The agencies have also been working with Placer County in developing a Habitat Conservation Plan (HCP) and a Natural Communities Conservation Plan (NCCP) for

Placer County. In August 2000, the Service entered into a Memorandum of Understanding (MOU) with the City to limit the effects of increased growth as a result of development of the Pleasant Grove Waste Water Treatment Plant. Conditions within the MOU outline the City's responsibility to develop a long-term HCP or its equivalent and to develop an interim conservation strategy for lands within the City's jurisdiction. Although portions of the annexation are not included in the MOU, the Service feels that any development authorized by the City should be consistent with measures outlined in the MOU for the conservation of the natural resources in Placer County.

The WRSP has identified open space areas where conservation of vernal pool, wetland, riparian, and grassland ecosystems are to be preserved. We feel that these areas are entirely inadequate to protect listed vernal pool crustaceans. The Service strongly recommends that conservation efforts within the WRSP and adjacent planning area include the following:

- Conservation areas should be consistent, complimentary, and be compatible with the regional conservation planning efforts for Placer County.
- Provide for the long-term survival and recovery of listed vernal pool species.
- Vernal pool ecosystems should be conserved at a landscape level and include adjacent upland areas which are essential in maintaining watershed and hydrologic functioning of the pools.
- Areas surrounding vernal pools, listed vernal pool crustacean habitats, and riparian areas should be large enough to limit indirect effects.
- Access to conservation areas should not include roadways or trails to discourage dumping and other disturbances resulting from human impacts.
- Development shall not preclude the development of a viable HCP/NCCP for Placer County.
- Modify the WRSP project design to limit impacts to areas which have less effects on vernal pool and grassland landscapes within the area.

It is the regional policy of the Service to ensure no net loss of wetland acreage or value, whichever is greater. To offset unavoidable resource losses for acceptable projects, the Service recommends that appropriate conservation of the resources be provided. The Council on Environmental Quality regulations for implementing the National Environmental Policy Act define mitigation to include: (1) avoiding the impact; (2) minimizing the impact; (3) rectifying the impact; (4) reducing or eliminating the impact over time; and (5) compensating for impacts. The Service supports and adopts this definition of conservation and considers the specific elements to represent the desirable sequence of steps in the conservation planning process. Accordingly, we maintain that the best way to compensate for adverse biological impacts is to avoid them altogether.

The WRSP and adjacent planning area is within the Southeastern Sacramento Valley vernal pool region identified by the California Department of Fish and Game in their Preliminary Vernal Pool Assessment Report (Keeler-Wolf *et al.* 1998). This region contains almost 14 percent of all vernal pools remaining within California's Central Valley (Holland 1998). The Southeastern Sacramento Valley Vernal Pool Region also comprises a significant portion of the ranges of the federally-listed vernal pool crustaceans. The region contains 20 percent of the known occurrences of vernal pool fairy shrimp and 42 percent of the known occurrences of vernal pool tadpole shrimp [Natural Diversity Database (NDDDB) 2001]. Vernal pool habitats in this region are essential for the conservation of these species because they include a variety of habitat types, including the extremely rare northern volcanic mudflow vernal pools, as well as high terrace vernal pools on upper stream terraces, and low terrace vernal pools along the lower alluvial basins. Since the vernal pool tadpole shrimp and vernal pool fairy shrimp were federally listed in 1994, 70 percent of all vernal pool destruction documented by the Service occurred in the Southeastern Sacramento Valley Vernal Pool Region.

Placer County contains almost 35 percent of all vernal pools within the Southeastern Sacramento Vernal Pool Region. As of 1994, Holland estimated that over 48,000 acres of vernal pool grasslands remained in Placer County. Widespread urban development has eliminated many of these habitats. In 2001, Glazner mapped 20,676 acres of vernal pool grasslands remaining in the county. Approximately 2,146 acres are contained within established preserve areas and another 3,946 acres are currently within the proposed City of Roseville Annexation area and Placer Vineyards project area. Combined with other proposed development and highway projects, there is the potential for an additional loss of over 5,000 acres of vernal pool habitats from Placer County. These projects would also significantly fragment and isolate remaining habitat areas from one another. The WRSP occupies a central portion of the last remaining large, contiguous vernal pool grasslands in Placer County. The protection of such areas is essential to the conservation of the vernal pool fairy shrimp, as well as to the larger vernal pool landscape.

Placer County is in the process of developing a HCP under section 10(a)(1)(B) of Act and a NCCP under the State of California's Natural Community Conservation Planning Act of 1991. The proposed project is within the Phase I planning area of the Placer County HCP/NCCP. Development of the project site as proposed could preclude Placer County's ability to develop a regional conservation strategy. The habitat present within the WRSP is regionally significant not only in terms of conservation value for the federally-listed vernal pool fairy shrimp and tadpole shrimp, but also in terms of its potential long-term ability to support a high diversity of sensitive species. Efforts should be made to protect the majority of the WRSP area due to the relatively large extent of habitat, proximity to other fish and wildlife habitat, and value as a landscape link.

The Service is committed to working with the City and Placer County in development of a viable HCP/NCCP for the county and would like to thank you for the opportunity to comment on this NOP. The Service requests that a copy of any future Environmental Impact Reports or similar documents be provided to this office.

Ms. Kathy Pease

4

If you have any questions about these comments on the West Roseville Specific Plan, please contact Arnold Roessler at (916) 414-6645 or Lori Rinek at (916) 414-6492.

Sincerely,



Jan C. Knight  
Chief, Endangered Species Division

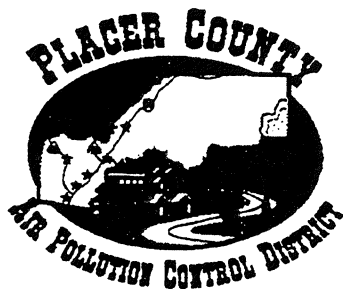
cc:

Environmental Protection Agency, San Francisco, CA (Attn: Ms. Kathy Dadey)  
National Marine Fisheries Service, Sacramento, CA (Attn: Ms. Kelly Finn)  
U.S. Army Corps of Engineers Sacramento, CA (Attn: Mr. Tom Cavanaugh)  
California Department of Fish and Game, Rancho Cordova, CA (Attn: Mr. Jeff Finn)  
State Water Resources Control Board, Sacramento, CA (Attn: Gary Carlton)  
Placer County Planning Department, Auburn, CA (Attn: Mr. Loren Clark)

**REFERENCES CITED**

- California Natural Diversity Data Base. 2002. Natural Heritage Division. California Department of Fish and Game, State of California.
- Glazner, J. 2001. GIS coverage of vernal pools prepared for Placer County and Placer Legacy, Auburn, California.
- Holland, R. F. 1998. Great Valley vernal pool distribution, photo revised 1996. Ecology, Conservation, and Management of Vernal Pool Ecosystems. Proceedings of the California Native Plant Society Conference, 1996. Sacramento, California.
- Keeler-Wolf, T., D. R. Elam, K. Lewis and S.A. Flint. 1998. California Vernal Pool Assessment. Preliminary Report. California Department of Fish and Game, Sacramento, California.





11464 B Avenue, Auburn, CA 95603 • (530) 889-7130 • Fax (530) 889-7107

Thomas J. Christoff, Air Pollution Control Officer

September 13, 2002

Kathy Pease, Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, Ca 95678

**Subject:** Notice of Preparation for a Draft Environmental Impact Report for the West Roseville Specific Plan / Sphere of Influence and Annexation Project (WRSP), and City/County Memorandum of Understanding Area Sphere of Influence Amendment (MOU) Environmental Impact Report.

Dear Ms. Pease,

Thank you for submitting the Notice of Preparation for the above referenced project to the Placer County Air Pollution Control District (District) for review. Buildout of the WRSP and MOU areas will result in significant local and regional air quality impacts if sufficient project design / mitigation measures are not implemented by this project to reduce its air quality impacts. As a result, a detailed air quality analysis should be provided in the Draft Environmental Impact Report (DEIR) to quantify project impacts and identify feasible mitigation measures. At a minimum, the following information should be provided when evaluating the potential air quality impacts from the WRSP and MOU areas.

1. The Setting and Background section should discuss the existing air quality in Placer County and the Sacramento Valley Air Basin (SVAB), the severe non-attainment designation for federal ozone standards and the non-attainment designation for State ozone and particulate matter (PM10) standards. The federal regulatory implications to jurisdictions within the SVAB if this area does not attain federal ambient air quality standards by 2005 should also be discussed.
2. The project's consistency with the growth projections contained in the Sacramento Area Regional Ozone Attainment Plan (1994) should be evaluated. The rapid population and employment growth occurring within Placer County is significantly impacting attainment of State and federal health based ambient air quality standards in the SVAB.
3. The proposed land uses could result in land use compatibility impacts by locating stationary sources of air pollutant emissions near planned residential and school areas. These potential stationary sources could have emissions below District permitting thresholds, but emit odors that would significantly impact nearby land uses. In addition, the proposed power plant and existing wastewater treatment plant are sources of toxic air contaminants. Potential health impacts on future land uses should be evaluated and mitigated if necessary.

4. Using the Urbemis 7G computer model, estimate the amount air pollutant emissions from construction and long-term operation of the WRSP and MOU areas. Construction emissions should include those associated with on-site and off-site infrastructure improvements needed to serve the project, and construction of the structures. Standard default input variables can be used for the model if specific information is not available regarding construction equipment. The results should be provided in tons per year and in pounds per day and compared to the District's significance thresholds of 82 pounds per day for nitrogen oxide, reactive organic gases and particulate matter (PM 10) and 550 pounds per day for carbon monoxide emissions. The DEIR preparers should contact the District to discuss the Urbemis 7G input variables to be used for this project.
5. Please identify how any removed vegetation will be disposed. Mitigation measures should be proposed that eliminate the need for open burning. If open burning is allowed by the City of Roseville, a burn permit from the District is required. The DEIR should estimate emissions from open burning if not prohibited through conditions of approval.
6. If the traffic study prepared for this project identifies any intersection(s) that would operate at or below a Levels of Service D under project alone or cumulative development scenarios, a detailed Caline 4 Carbon Monoxide analysis should be prepared. The Roseville area has recently been reclassified from federal and State nonattainment to attainment for carbon monoxide standards.
7. Using the Urbemis 7G computer model, estimate the amount of emission that would result from buildout of the project areas under existing Placer County General Plan land use designations. These emissions should be compared to those emissions estimated for the proposed WRSP and MOU areas. If the emission estimates are greater for the proposed project, sufficient mitigation measures should be identified to completely offset the projected increase in air pollutant emissions.
8. Attached to this letter is a list of Best Available Mitigation Measures implemented by other projects in Placer County. The WRSP & MOU areas should be required to implement sufficient on-site design measures and off-site measures to reduce construction and project alone impacts below the significance level. The off-site mitigation strategy has been implemented by numerous projects within Placer County, the Cities of Rocklin, Lincoln and Colfax and is considered feasible for this project to implement.

If you have any questions or concerns, please call me at (530) 889-7131.

Sincerely,



David A. Vintze  
Senior Planner

Encl: Best Available Mitigation Measures

## BEST AVAILABLE MITIGATION MEASURES

This list of possible mitigation strategies is provided by the District as a means for project applicants to identify measures that can be implemented to reduce a project's long-term and short-term air quality impacts. It is not the intention that all measures would be implemented by any one project. This list is intended to provide options to applicants to implement those measures that are feasible for them to implement. The District staff should be contacted to discuss the emission reductions that can be claimed for implementing any of these measures.

### CONSTRUCTION ACTIVITY

Projects that are estimated to result in daily construction emissions greater than 82 pounds per day for any pollutant and / or are located in areas experiencing significant cumulative air quality impacts, should be required to submit a Construction Emission/Dust Control Plan (Plan) to the District for review and approval. At a minimum, the Plan should include measures 1-6 listed below and all feasible measures listed under "Construction Activity".

1. The applicant shall submit to the District and receive approval of a Construction Emission / Dust Control Plan prior to groundbreaking.
2. Construction equipment exhaust emissions shall not exceed District Rule 202 Visible Emission limitations.
3. The prime contractor shall submit to the District a comprehensive inventory (i.e. make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower or greater) that will be used an aggregate of 40 or more hours for the construction project. District personnel, with assistance from the California Air Resources Board, will conduct initial Visible Emission Evaluations of all heavy-duty equipment on the inventory list.
4. An enforcement plan shall be established to weekly evaluate project-related on-and-off-road heavy-duty vehicle engine emission opacities, using standards as defined in California Code of Regulations, Title 13, Sections 2180 - 2194. An Environmental Coordinator, CARB-certified to perform Visible Emissions Evaluations (VEE), shall routinely evaluate project related off-road and heavy duty on-road equipment emissions for compliance with this requirement. Operators of vehicles and equipment found to exceed opacity limits will be notified and the equipment must be repaired within 72 hours.
5. Construction contracts should stipulate that at least 50% of the heavy-duty off-road equipment included in the inventory be powered by CARB certified off-road engines, as follows:

175 hp - 750 hp	1996 and newer engines
100 hp - 174 hp	1997 and newer engines
50 hp - 99 hp	1998 and newer engines

In lieu of or in addition to this requirement, an applicant can use other measures to reduce particulate matter and nitrogen oxide emissions from their project through the use of emulsified diesel fuel and or particulate matter traps. The District should be contacted to discuss this measure.

6. No open burning of removed vegetation during infrastructure improvements. Vegetative material should be chipped or delivered to waste to energy facilities.
7. Develop trip reduction plan to achieve 1.5 AVR for construction employees.
8. Clean earth moving construction equipment with water once per day.
9. Spread soil binders on unpaved roads and employee/equipment parking areas.
10. Apply approved chemical soil stabilizers according to manufacturers' specifications, to all inactive construction areas (previously graded areas which remain inactive for 96 hours).
11. Reestablish ground cover on the construction site as soon as possible through seeding and watering.
12. Implement or contribute to a native tree-planting program to offset the loss of existing trees at the construction site.
13. Employ construction activity management techniques, such as: extending the construction period outside the ozone season of May through October; reducing the number of pieces used simultaneously; increasing the distance between emission sources; reducing or changing the hours of construction; and scheduling activity during off-peak hours.
14. Wet broom or wash streets if silt is carried over to adjacent public thoroughfares.
15. Reduce traffic speeds on all unpaved surfaces to 15 miles per hour or less.
16. Suspend all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour and dust is impacting adjacent properties.
17. Install wheel washers or wash all trucks and equipment leaving the site.
18. Minimize idling time to 10 minutes.
19. An operational water truck shall be onsite at all times. Apply water to control dust as needed to prevent dust impacts offsite.
20. Use low sulfur fuel for stationary construction equipment.
21. Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
22. Use low emission on-site stationary equipment.
23. Provide a flag person to guide traffic properly and ensure safety at construction sites.
24. Schedule operations affecting traffic for off-peak hours.
25. Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service.
26. Minimize obstruction of through-traffic lanes.

## **OPERATIONAL**

The following is a list of mitigation measures that have been identified by the District to reduce a project's long-term operational impact on local and regional air quality. All projects should implement

those measures that are logical and feasible for their project to implement due to the existing severe nonattainment designation in Placer County for federal and State ozone standards. Projects that cannot implement sufficient onsite measures to reduce project impacts, can implement the off-site mitigation measure or participate in the District's offsite mitigation program. Please see measure number 101 for details on the District's offsite mitigation program. Implementation of these measures will ensure that projects implement all feasible mitigation measures.

27. Tree planting of California native species in excess of that already required.
28. Landscape with native drought-resistant species (plants, trees and bushes) to reduce the demand for gas powered landscape maintenance equipment.
29. Use of low VOC coatings per District Rule 218 Architectural Coatings.
30. Site design to minimize the need for external trips by including services/facilities for day care, banking/ATM, restaurants, vehicle refueling, and shopping.
31. Require development practices, which maximize energy conservation.
32. Improve the thermal integrity of buildings, and reduce the thermal load with automated time clocks or occupant sensors.
33. Introduce window glazing, wall insulation, and efficient ventilation methods.
34. Introduce efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units.
35. Incorporate appropriate passive solar design and solar heaters.
36. Use devices that minimize the combustion of fossil fuels.
37. Capture waste heat and re-employ it in nonresidential buildings.
38. Electrical outlets shall be installed on the exterior walls of both the front and back of a residence or all commercial buildings to promote the use of electric landscape maintenance equipment.
39. Install a gas outlet in the backyard for gas burning barbecues.
40. Install a gas outlet for use with outdoor cooking appliances, such as a gas barbecue.
41. Install a gas outlet with ceramic logs in any proposed fireplaces, including outdoor recreational fireplaces or pits.
42. Install low nitrogen oxide (NOx) hot water heaters.(Beyond District Rule 246 Requirements)
43. Install electric vehicle recharging circuits in residential garages / parking lots.
44. Install electric vehicle charging raceways in residential garages.
45. Prohibit gas powered landscape maintenance equipment within developments.
46. Purchase battery powered or electric landscape maintenance equipment for new residences.
47. Require landscape maintenance companies use battery powered or electric equipment.
48. Create / increase buffer zones between a sensitive receptor and pollution source.
49. Configure parking to minimize traffic interference.
50. Schedule goods movement for off-peak traffic hours.
51. Synchronize traffic signals.
52. Provide adequate ingress and egress at entrances to public facilities to minimize vehicle idling at curbside.
53. Provide dedicated turn lanes as appropriate.
54. Join a local Transportation Management Association (TMA) and prepare employer-based trip reduction plans.

55. Establish telecommuting programs, alternate work schedules, and satellite work centers.
56. Design parking areas with less emphasis on "convenience."
57. Include a limited number of parking spaces in project design.
58. Include wide parking spaces or vanpool only spaces to accommodate vanpool vehicles.
59. Develop vehicle and bicycle all day parking lots near rail stations, transit stops, and freeway access points.
60. Construction/enhancement of a Park and Ride lot.
61. Parking pricing strategies, such as charging parking lot fees to low occupancy vehicles.
62. Provide preferential parking for those who rideshare.
63. Provide funds for on line computer rideshare matching.
64. Provide ridesharing information in a homeowner's association package.
65. Site design to maximize telecommunication including an appropriate network infrastructure.
66. Provide satellite work offices when appropriate. Applicable to office/industrial and educational institutions.
67. Design/establish telecommuting programs for office/industrial complexes.
68. Offer low cost financing to employees for the purchase of telecommuting equipment, or lend company-owned equipment.
69. Design "Shop by Telephone" or "Shop-by-Computer" services. Applicable to shopping centers and retail facilities.
70. Provide individual private telephones for patients at medical facilities, which allows for "visits without trips."
71. Purchase abandoned railroad rights-of-way for future transit line, bikeway or hiking use(s).
72. Contribute to an area transit fund to help build, maintain, and enhance transit services/facilities/amenities.
73. Site design to maximize access to existing transit lines.
74. Street design to accommodate bus travel.
75. Street design to maximize pedestrian access to transit stops, including access from residential cul-de-sacs to collector and arterial streets.
76. Site design to include bus shelters at transit access points.
77. Provide additional lighted transit shelters and multimodal transfer stations for transit users.
78. Construction of transit facility/amenity(bus shelters, bicycle lockers/racks, etc ) for existing public and private transit.
79. Provision for transit-use incentives such as subsidized transit passes, accommodation of "unusual" work schedules to allow for transit schedules. Applies to office/industrial, educational institutions, and resorts/hotels.
80. "Validation" of a transit ticket to provide free return trip. Applies to shopping centers, hospitals/medical facilities, and retail facilities.
81. Sell transit passes. Applies to retail facilities, educational institutions, resorts/hotels, and office/industrial complexes.
82. An employer subsidized free or reduced transit fares for midday central business district trips.
83. Free transfers between all shuttles and transit.
84. Subsidized school bus service.
85. A subsidy of added transit services.

86. An employer subsidized shuttle service to connect to existing transit sites.
87. Operation of a shuttle bus to shopping, health care, public services sites and other nearby trip attractors to reduce automobile use.
88. Establish delivery services. Applicable to retail facilities (frequent use), shopping centers, and restaurants.
89. Site design to maximize bicycle access to and within the project and/or provide bicycle parking/lockers.
90. An employer/developer provided locker room/showers to employees whom bicycle.
91. Include Class 2 bicycle lanes in new developments.
92. Develop or improve bicycle/pedestrian paths between destinations using public and/or utility rights-of-way.
93. Develop or improve access by bicycle, wheelchair or pedestrian traffic to existing major destinations in city or region. For example, schools, employment centers, shopping, recreation, and parks.
94. Provide secure bicycle storage at public parking facilities.
95. Contribute funding toward the purchase and operation of air quality monitoring equipment.
96. Provide a location for air monitoring equipment.
97. Require mixed-use development in order to achieve a balance of commercial, employment, and housing options within the project site or its immediate environment.
98. Provide higher density land uses around activity centers, transportation nodes and transit corridors.
99. Only U.S. EPA Phase II certified woodburning devices shall be allowed in single-family residences. The emission potential from each residence shall not exceed 7.5 grams per hour.
100. Woodburning or Pellet appliances shall not be permitted in multi-family developments. Only natural gas or propane fired "fireplace" appliances are permitted.
101. Install Photovoltaic roofing tiles for solar power.
102. If a project cannot implement sufficient on-site measures to reduce its long-term operational emissions, the project could implement an offsite mitigation program to achieve the required emission reduction. Offsite mitigation strategies are modeled after existing heavy duty nitrogen oxide reduction programs and include retrofitting existing on-road or off-road heavy vehicles/equipment with cleaner burning engines, retrofitting or purchasing new low emission agriculture pumps, transit vehicles, CNG fueling infrastructure or replacing non-EPA certified woodstoves with new EPA certified units. The design of the offsite mitigation program would depend on the type and amount of emission reductions needed.

In lieu of each individual project implementing their own offsite mitigation program, an applicant can choose to pay an equivalent amount of money into the District's Air Quality Mitigation Fund. The District provides monetary incentives to sources of air pollutant emissions within the projects general vicinities that are not required by law to reduce their emissions. Therefore, the emission reductions are real, quantifiable and implement provisions of the 1994 State Implementation Plan. The offsite mitigation program has been implemented by a number of projects in Placer County.





## PLACER COUNTY PLANNING DEPARTMENT

11414 B Avenue/Auburn, California 95603/Telephone (530) 889-7470/FAX (530) 889-7499  
Web Page: <http://www.placer.ca.gov/planning> E-Mail: [pkthomps@placer.ca.gov](mailto:pkthomps@placer.ca.gov)

September 16, 2002

Kathy Pease  
City of Roseville Planning Department  
316 Vernon Street, Ste. 104  
Roseville, CA 95678

**Subject: West Roseville Specific Plan/Sphere of Influence and Annexation Project and MOU Area Sphere of Influence Amendment (SCH# 2002082057)**

Dear Ms. Pease:

This is in response to the City of Roseville's request for comments on the Notice of Preparation for the West Roseville Specific Plan/Sphere of Influence and Annexation Project and MOU Area Sphere of Influence Amendment draft Environmental Impact Report. The Placer County Planning Department appreciates the opportunity to respond to this proposal given that the project is currently within the unincorporated area of Placer County.

The Draft Environmental Impact Report (DEIR) for this project should address the following issues:

**Land Use Compatibility** - The West Roseville Specific Plan (WRSP) proposes residential development adjacent to the unincorporated area of Placer County. The DEIR should evaluate land use compatibility between residential uses proposed within the WRSP and the existing agricultural land uses within Placer County.

Agricultural land use activities have the potential to generate noise, dust, and odor from a variety of farming and operational activities. These activities may not be considered obnoxious in an agricultural environment; however, they may be considered obnoxious to residential land uses. The affect of agricultural operations on residential land uses should be evaluated and appropriate mitigation measures should be developed.

In order to reduce potential impacts to residential land uses adjacent to agricultural and uses located to the north, south, and west of the project site, adequate buffer areas should be developed and preserved. From review of the land use map provided with the NOP, adequate open space buffering along the north, south, and west boundary is not proposed in connection with this project.

Ms. Pease  
Re: WRSP NOP Comments  
September 16, 2002  
Page 2

In order to ensure full disclosure of the agricultural activities surrounding this project it is the County's position that the project should be required to incorporate the County's Right-to-Farm Ordinance in the project CC&R's.

**Circulation** - The DEIR should analyze the compatibility of existing and future road connections between the WRSP area and the unincorporated area of Placer County. The DEIR should also consider circulation impacts of the project when associated with the development of the Placer Vineyards project and the Placer Parkway. It is the County's understanding that the Placer Parkway is intended to be an expressway with limited connections. Also, this project may conflict with the alignment of the Placer Parkway. The DEIR should evaluate the impacts of the project on the Placer Parkway as well as not conflict with the alignment of the Parkway itself.

**Traffic** - The DEIR should evaluate the project's contribution to traffic impacts within Placer County. The traffic impacts should also be considered with the Placer Vineyards project.

**Water Supply** - The DEIR should evaluate this project's impacts on the existing groundwater supply. The Placer County General Plan prohibits the use of groundwater as a domestic water source for new development. It is a goal of the Plan to ensure the availability of an adequate and safe water supply and the maintenance of high quality water in water bodies and aquifers used as sources of domestic supply (4.C). The policy to implement this goal requires new urban development to rely on public water systems using a surface water supply (4.C.2). Because this project is currently located within the unincorporated area of Placer County, the DEIR should evaluate this impact. The DEIR should address alternatives to using groundwater as a domestic water supply.

**Affordable Housing** - The NOP indicates that "of the total number of dwelling units, ten percent are planned to meet affordability criteria for low or middle-income households, as set forth in the General Plan." Regardless of the General Plan consistency, this percentage does not realistically meet this project's demand for affordable housing. A greater percentage should be considered in the DEIR.

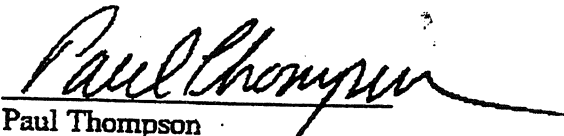
**MOU Remainder Area** - The NOP indicates that the analysis for the MOU remainder area will be done at a programmatic level (CEQA Guidelines Section 15168). The NOP further states: "Any future residential projects that are consistent with the WRSP could be considered exempt from further environmental review." While it appears that the MOU Remainder Area is not part of the WRSP, this statement may lead one to believe that further environmental review will not be completed on residential projects within the MOU Remainder Area. If this is the case, Placer County will need a project level environmental analysis for the MOU Remainder Area, or at least

Ms. Pease  
Re: WRSP NOP Comments  
September 16, 2002  
Page 3

a specific plan or precise zoning level of information in order to properly analyze potential impacts even at a programmatic level.

Thank you again for your consideration of our comments. This office looks forward to reviewing the DEIR, the Specific Plan, Infrastructure Master Plan, and Financing Plan when they become available. If you have any questions regarding these comments, please do not hesitate to contact me directly.

Sincerely,



Paul Thompson  
Supervising Planner

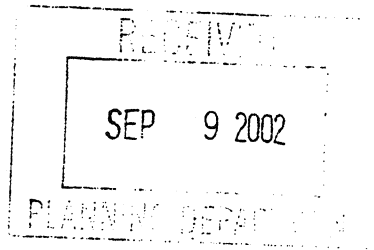
cc: Supervisor Weygandt  
Fred Yeager, Director of Planning  
Holly Heinzen, CEO  
Bill Moore, Department of Public Works  
Chron file

ref: r:\cmd\cmdp\pan\rcr\2000\wrsp nop.doc



DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

California Highway Patrol  
9440 Indian Hill Road  
Newcastle, CA 95658  
(916) 663-3344  
(800) 735-2929 (TT/TDD)  
(800) 735-2922 (Voice)



September 3, 2002

File No.: 220.10284.8837.SCH#2002082057

Ms. Kathy Pease  
City of Roseville Planning Department  
316 Vernon Street  
Roseville, CA 95678

Dear Ms. Pease:

Recently, the California Highway Patrol (CHP) Auburn Area had the opportunity to review the Notice of Preparation (NOP) for the West Roseville Specific Plan/Sphere of Influence, Annexation Project, and MOU Area Sphere of Influence Amendment SCH# 2002082057. We believe the growth discussed will impact the mission of the CHP of ensuring safety and service of the public as they use the highway transportation system. The project as outlined in the NOP, will substantially increase traffic volume and impact the State highways and roadways within the western portion of the Placer County, particularly Interstate 80 (I-80), State Route 65 (SR 65) and Baseline Road.

The proposed West Roseville Specific Plan encompasses approximately 3100 acres, a considerable portion of which is currently in the unincorporated area of Placer County. Under this project the area will become a part of the City of Roseville. The only roads currently within the jurisdiction of CHP which this project affects is a small portion of Fiddymont Road and Phillip Road. The loss of jurisdiction over these roadways which is less than five miles of roadway and will not affect our primary mission or our personnel deployment. However, the effect this project will have over the Auburn CHP Area could be significant in the sheer magnitude of residents it will attract. The plan calls for 8,430 residential units with a projected population increase of 21,000 new residents. Additionally, there are plans for commercial and light industrial which will further add to the daily trips count for this area. As stated in the report, the network of planned and existing roads will channel traffic in a northeast direction toward SR 65 and ultimately I-80. The additional trips that approximately 21,000 new residents will generate will further strain SR 65, I-80, and Baseline Road.

State Route 65, which is located on the north edge of Roseville, has already experienced a major increase in usage due to the Galleria Mall opening, the growth from the City of



Ms. Kathy Pease  
Page 2  
September 3, 2002

Lincoln, Roseville, and Rocklin. The projected opening of a casino along this major route will only further increase traffic on SR-65 and I-80.

Interstate 80, which bisects the City of Roseville, is currently operating at near maximum capacity. During certain times of the day, Interstate 80 is beyond capacity resulting in gridlock or near gridlock as traffic flows at a seriously reduced speed in both directions. This gridlock and congestion increases the potential for additional collisions. Any significant increase in growth will further affect this major Interstate.

Additionally the projected growth will also strain the capacity of Baseline Road as many of the residents will utilize Baseline Road to access SR 99 to I-5 and I-80 or downtown Sacramento. The current 2 lane configuration of Baseline is inadequate to handle the additional traffic safely.

We anticipate reviewing the Environmental Impact Report, when completed, for a more detailed study of this project and the impact it will have on our operations. Through cooperative partnerships with local, county and State entities the CHP will continue to monitor the growth of the City of Roseville and the surrounding cities for its impact on the CHP's mission.

Sincerely,



RICK WARD, Captain  
Commander  
Auburn Area

cc: Assistant Chief Carolyn Carlson, Valley Division  
Special Projects Section



September 19, 2002

Ms. Kathy Pease, Administrative Analyst  
Roseville Planning Department  
311 Vernon Street  
Roseville, CA 95678

Dear Ms. Pease:

The Department of Fish and Game (DFG) has reviewed the Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the West Roseville Specific Plan (WRSP)/Sphere of Influence and Annexation Project and Memorandum of Understanding (MOU) Area Sphere of Influence (SOI) Amendment EIR. The site is located west of the city limits of Roseville, Placer County.

The two projects propose extensive urban development on about 5,708 acres of native habitats. Both projects would be developed in a manner consistent with prior development in the City of Roseville.

Significant natural resources of the plan area include wetlands, vernal pool grasslands and associated federally listed invertebrates, riparian habitats, listed plants, stream environments including habitats associated with Pleasant Grove Creek and foraging and nesting habitat for the state listed threatened Swainson's hawk (*Buteo swainsonii*). Glazner (2000, unpublished contract to Placer County) mapped about 20,677 acres of vernal pool grassland habitat remaining in western Placer County. This project, in combination with other proposed or suggested projects in western Placer County, has the potential to impact 15-20% of this habitat. We believe that the degree to which this proposed project and other proposed or considered projects can mitigate project impacts to vernal pool grasslands and riparian and stream resources is a fundamental issue of this project.

The DFG is providing comments in response to the NOP under CEQA as both a responsible and trustee agency. As trustee for the State's fish and wildlife resources, the DFG has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of such species. In that capacity, DFG administers the California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and other provisions of the California Fish and Game Code that affords

protection to the State's fish and wildlife trust resources the DFG recommends that the DEIR include discussion and evaluation of the following:

1. Analyze and discuss all reasonably foreseeable direct and indirect project-related impacts on biological resources due to implementation of both projects. The analysis should focus, in particular, on the presence of and potential habitats for all state and federal listed species and species of concern and the evaluation of direct, indirect and cumulative project impacts to these species and their respective habitat. This analysis should include discussion of adjacent habitats outside of the plan area that support or could support listed species or species of concern and that may be impacted as a result of project implementation or other proposed or potential projects in west Placer County.
2. Identify and discuss potentially feasible mitigation measures to address all reasonably foreseeable project-related impacts on biological resources. This must include identification of mitigation measures that minimize and fully mitigate all project impacts to state and federally listed species and species of concern. Analysis should include discussion of the ability to conserve natural resources on site that may be achieved through project design and take avoidance measures and offsite mitigation obtained through acquisition of existing natural resources.
3. Identification of offsite infrastructure improvements, such as Placer Parkway, and evaluation of potential project impacts due to these activities. Subsequently, the EIR should identify and analyze potentially feasible mitigation measures that avoid or substantially lessen, and minimize and fully mitigate, all reasonably foreseeable direct and indirect impacts to biological resources.
4. Identification of those areas known to support concentrations of wintering waterfowl of the Pacific Flyway. The DEIR should identify and analyze potentially feasible mitigation measures that avoid or substantially lessen, and minimize and fully mitigate, all reasonably foreseeable direct and indirect impacts to this resource. Include development of mitigation measures designed to minimize and fully mitigate project impacts through project design and incorporation of appropriate buffers.
5. Evaluation of the development of the proposed plan areas contribution to habitat fragmentation and population isolation of all plant and animal populations including but not limited to listed

species and species of concern. Include identification of potentially feasible mitigation measures that will avoid or substantially lessen these impacts.

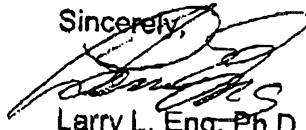
6. Evaluate the consistency of the proposed projects with the Memorandum of Understanding (MOU) between the City of Roseville and the Fish and Wildlife Service (FWS) pursuant to approval of the Pleasant Grove Wastewater Treatment Plant.
7. Evaluate the consistency of the proposed projects with the conservation planning efforts pursuant to Natural Community Conservation Planning and Habitat Conservation Planning. This analysis should specifically address the scientifically supportable basis for the proposed project and all alternatives development scenarios as subsequently suggested using sound principles of conservation biology. Describe measures that will assure that these proposed projects are consistent with a long term conservation strategy for west Placer County.
8. Development of alternative development/design scenario for the proposed project that will achieve most of the project objectives, and which will avoid or substantially lessen the project-related impacts on biological resources. The DFG believes such a potentially feasible alternative exists with respect to reduced impacts on biological resources generally and, in the alternative, at a minimum, that such potentially feasible alternative exists with respect to listed species and species of special concern. Accordingly, the DFG believes that such alternatives should comprise part of the reasonable range of alternatives addressed in the DEIR.
9. Specifically develop an alternative design that that conserves all natural resources north of Pleasant Grove Creek and that area south and west of the Pleasant Grove Wastewater Treatment Plant. This design may reduce project impacts due to fragmentation and be consistent with a potential Placer County conservation strategy, be scientifically defensible and be consistent with the MOU between the City of Roseville and the FWS. We believe that this alternative is potentially feasible in that it may well achieve a majority of the project objectives and reduce potentially significant impacts on biological resources. Such an alternative should also be considered as part of the reasonable range of alternatives considered in the DEIR.

Ms. Peters  
September 19, 2002  
Page 4

10. Specifically describe impacts and address appropriate mitigation measure for activities associated with rechannnelization of minor tributaries and construction of retention basins.
11. Specifically describe all proposed uses and management strategies and activities associated with all proposed non-urbanized land.
12. In order to comply with Public Resources Code Section 21081.6, a detailed monitoring program must be developed for all mitigation conditions. The monitoring program should include the following:
  - a. Specific criteria to measure the effectiveness of mitigation.
  - b. Annual monitoring for a minimum of five years. Annual written reports submitted to the lead agency and the DFG Sacramento Valley Central Sierra Region.
  - c. Annual monitoring reports, each of which includes corrective recommendations that shall be implemented in order to ensure that mitigation efforts are successful.

Thank you for the opportunity to review this project. If we can be of further assistance, please contact Mr. Jeff Finn at (530) 477-0308 or Ms. Terry Roscoe, Environmental Services Supervisor at (916) 358-2883.

Sincerely,



Larry L. Eng, Ph.D.  
Deputy Regional Manager

cc: Ms. Terry Roscoe  
Mr. Jeff Finn  
Department of Fish and Game  
1701 Nimbus Road, Suite A  
Rancho Cordova, CA 95670

**Notice of Preparation  
Scoping Meeting for the  
West Roseville Specific Plan  
August 29, 2002**

**VERBAL COMMENTS RECEIVED**

**Speaker #1**

- Chemicals from Wastewater Treatment Plant  
-How will it affect nearby residential? (EUD)
- Relationship of Placer Parkway to project area. (PW)
- Who's paying for additional analysis for the remainder of the MOU Area? (PIng)
- Is there a time limit on the preparation of the Final EIR? (PIng)
- Impacts to streets that are already overburdened. (PW)
- Reduced LOS standards are being analyzed by the City Council. Will this project further reduce those standards? (PW)  
-oppose reducing General Plan standards.

**Speaker #2**

- Library level of service is already a problem in the community. 10,300 s.f. for 10-15,000 residents will be three libraries deficient per City standards. (Lib)
- Buffer area around Wastewater Treatment Plant- (EUD)
  - need to analyze distances between residential and the WWTP and the Power Plant.
  - Both Diane Eastin and Christopher Grimes have written to ENRON regarding schools.
- Water supply issue.
  - ENRON is in suspension and delayed until 2007, therefore, there will be a need for supplemental water to support project until 2010. (EUD/CDD)

**Speaker #3**

- Height of structures to be built on the west side of Fiddymont
  - Privacy impacts to 1-story units in existing city. (PIng)

**Speaker #4**

- Guiding Principles sound good but question whether they will be implemented. (PIng)
- Mitigation of impacts (PIng)
  - To the "extent possible" may not be enough to satisfy community.
- Water shortages and impacts to the water table are of concern. Lack of water is attributed to urban sprawl. (EUD)
- Recycled water is of concern if it will be supplied to residential uses. What if people end up drinking it? Is there a health concern? (EUD)

- Casino site. Where is it located in relation to the project? Explain how it relates to project site. (CDD)
- Why is the City looking at this plan? (Plng)
- The school districts need to be solicited for comments on their position on air quality from the REF/power plant. (Plng)
- Financial burden. Is this project the reason residents are paying for water meters? (ECS/EUD)

#### Speaker #5

- Should publish meeting notes.
- Results of scoping session should be made available to the public in another meeting before the Draft EIR.
- Are there any grade crossings in the project? Overpasses and noise from train horns should be analyzed. (PW)
- Need to provide more commercial areas to serve the project's population
  - more regional commercial (not just more supermarkets). This project would bring more traffic to the mall etc. (Plng/PW)
- Vernal pool impacts. Amendments in other specific plan areas such as the North West Roseville Specific Plan keep going through
  - What assurance is there for preservation? (CDD)
- 11 soccer fields are a little too much. In addition, there are too many active parks in the City. There isn't anywhere in the city where you can go put a blanket down and read a book without the fear of being hit by a ball. There is a need for more turf area and passive parks. (P&R)
- Casino site traffic impacts (PW)
  - There is a need for an analysis with and without the casino.

#### Speaker #6

- The project is incompatible with existing traffic in the area. Traffic on Fiddymont and Baseline is already maxed out. (PW)
  - how can it accommodate 8,400 new homes?

#### Speaker #7

- Conditions on Fiddymont have changed. It has become busier. (PW)
  - Noise impacts from traffic on Fiddymont need to be analyzed. (Plng)
  - There are excessive speeds from trucks, motorcycles on Fiddymont. (PW)
  - Additional traffic will affect property values of those residents immediately adjacent.
  - What will happen to Blue Oaks widening? (PW)
- There is a passive park need. (P&R)

#### Speaker #8

- Watt Avenue development (PW)
  - improvements are needed to adjust traffic flow.
  - implementing Watt Avenue improvements would relieve existing traffic congestion.

-City and County should work together to get project done.

Speaker #9

- Energy use, efficiency, and conservation measures should be studied. (Elec/EUD)
- Public transit and bikeways. (PW)
- Water availability/impacts. (EUD)
  - The water table should be analyzed. Baseline information on the water table should be provided.
  - The effect of drawdown and its effects.
- How will project induce growth in adjacent areas like the South Sutter Specific Plan, especially related to sprawl along Placer Parkway? (Plng/PW)
- Toxic sediments in the soil, including DDT and toxic plumes to future residents. (CDD)
- Study ways to reduce commuting. There is no Business Professional in the plan. BP uses would cut down on commuting. (PW/Plng)
- A Teen center should be provided. (P&R)

Speaker #10

- Great opportunity to decide what will happen adjacent to city.
- Construction impacts and phasing of the project. (Plng)
  - dust creates health issues especially with an older population nearby.
- Vernal pool preservation. They have been a low priority and we need to hang on to them. (CDD/P&R)
- Development of a golf course in the plan would enhance beauty of the area. It would provide more open space. (P&R)
- Passive uses, not just skateboards, more passive recreation is needed for blankets, picnicking, or just walking. (P&R)
- School impacts in relation to ENRON. (Schools)
- Drainage impacts (EUD/PW)
- ENRON (CDD)
  - analysis of any power plant.
- Adjacent growth in County. (Plng)
  - College proposal
  - Placer Parkway
  - A map of the broader area should have been brought/provided.

Speaker #2 again

- One good aspect of the plan is that it would provide housing for people beginning their careers.
- Project need not pay for all library shortages. (Lib/P&R)
  - Area should be designated as part of the project.
  - Build Mahany library now.

Speaker # 11

- Inevitable that growth will happen so City might as well control it.
- Traffic is a factor, access to 99. (PW)
- Water could get expensive. (EUD)

Speaker #12

- Water (EUD)
  - allocation of water
  - cost of new allocations
- Park impacts. (P&R)
  - cost to maintain by taxpayers?
  - Fiscal impacts to existing residents and General Plan per year? (ECS)
  - Will there be a separate park district? Any savings? If City accepts, what will cost to General Fund be? (P&R)
- Traffic analysis should look at “regional” traffic impacts generated by regional park facilities, weekend traffic impacts, impacts to hotels? (PW)
- Changes to aquifers by wells? (EUD)

**Notice of Preparation  
Scoping Meeting for the  
West Roseville Specific Plan  
August 29, 2002**

**WRITTEN COMMENT CARDS RECEIVED**

Card #1

- Wild life-owls, foxs, etc., impact. (CDD)

Card #2

- More than once tonight it was said that this meeting deals with the WRSP only. However, without consideration of the traffic conditions as they are presently, ie.,: Highway 65- access to and from Highway 99, congestion on Blue Oaks and Fiddymnt etc., how can you plan to bring 30,000 plus more people into the area? (PW)
- Is there any provision for other energy sources such as solar? Or is the City fixated on the potential income from a conventional energy plant? (Electric)

Card #3

- Baseline level of groundwater and groundwater draws of the project. (EUD)
- Effect on urban sprawl- relationship to South Sutter Specific Plan and whether Placer Parkway will create sprawl along the Parkway. (Plng)
- Effects on commuter traffic- can it be reduced by more office and employment opportunities in the project? (PW)
- Evaluate DDT in soils and other soil contaminants. (CDD)
- Evaluate toxic plumes in area. (CDD)

Card #4

- My concern is the height of structures proposed for the west side of Fiddymnt. I have lived in two cities in California where they built two story condos, which invaded the privacy of the backyard one-story dwellings across the street. (Plng)

Card #5

- Please add/better define in the DEIR how the hydrology was developed (pre versus post project runoff) and how this fits into the proposed retention (Reason Farms) west of Roseville (Sutter County resident). (PW)

Card #6

- We also need lights and stop signs at Del Webb Boulevard and Fiddymnt-Pleasant Grove and Fiddymnt. Older people don't move or drive as fast as younger ones. You take your life in your hands getting out onto Fiddymnt. (PW)

Card #7

- Traffic impacts throughout city. Lowering “LOS”. (EUD)
- Air Quality from the development of WRSP and additional from “proposed power plant” (which may people hope goes away for good). (CDD)
- Water shortages, drought conditions, and loss of water table due to WRSP. (EUD)
- Financial burden to City/existing residents- is this why we need water meters, already a cost to existing residents? (ECS)
- Health risks of proposed Power Plant on general population, children, and its proximity to schools. (CDD)

Card #8

- Will development fees cover cost of High School? Entire Cost? (Schools)
- Development of project without using dependency on water from San Juan Water District. (EUD)
- Impact of traffic on Granite Bay to access Folsom Lake State Park. (Douglas is only road on west side of Lake to access Beale, granite Bay, and Rattlesnake Bar) (PW)
- Roseville utilities, etc., were designed for a population of just over 100,000. How will current residents be impacted fiscally? (EUD/Electric/ECS)
- When will the annexation be taken to LAFCO? (Plng)
- This region can’t handle traffic and air pollution now. How can a new project mitigate these impacts to less than significant?(PW)
- How far back will EIR look at water history for this region? Can it be said with assurance that this area can continue to provide water for major development? (EUD)