

CHAPTER 2 COMMENTS AND RESPONSES

2.1 INTRODUCTION

Written comments were received on the Fiddymment Ranch Specific Plan Amendment (SPA) 3 Partial 2nd Recirculation of the Draft EIR (2014), Recirculated Draft Subsequent EIR (2013), and Draft Subsequent EIR (2011). In the responses to comments that follow, the following acronyms are used for each of these documents:

P2R Partial 2nd Recirculation of the Draft Subsequent EIR

RDSEIR Recirculated Draft Subsequent EIR

DSEIR Draft Subsequent EIR

The following written comments were received on these documents:

Letter	Author
Letter 1	State Clearinghouse
Letter 2	United Auburn Indian Community
Letter 3	CalTrans
Letter 4	Western Placer Waste Management Authority
Letter 5	Placer County Flood Control and Water Conservation District
Letter 6	Placer County Air Pollution Control District
Letter 7	Sacramento County Department of Transportation
Letter 8	Petrovich, John
Letter 9	Petrovich, Margaret
Letter 10	Thomas, Paul and Patricia
Letter 11	WestPark-Fiddymment Farms Neighborhood Association
Letter 12	Central Valley Flood Protection Board
Letter 13	Placer County Air Pollution Control District
Letter 14	Sacramento County Department of Transportation
Letter 15	Aufdemberge, Amy
Letter 16	Bowens, Kimberly
Letter 17	Cerlenko, Greg and Kristine
Letter 18	Cook, Loren and Sue Hallahan-Cook
Letter 19	Espinoza, Mark and Heidi Campbell
Letter 20	Fabbre, Rich
Letter 21	Hoss, Phillip L.
Letter 22	Nagra, Harpaul
Letter 23	Olivares, Theresa and Chris Bailey
Letter 24	Routon, Monte and Anissa
Letter 25	Stevens, Tom
Letter 26	Whitman, Julie

This chapter presents each of the written comments on the Draft EIR documents and the City of Roseville's response to each comment. Each comment letter is numbered in the margin to indicate the individual comments for which responses are provided. Each comment letter is immediately followed by the response to that letter (correspondingly numbered).

In addition, verbal comments on the proposed project and the RSDEIR were provided at the City of Roseville Planning Commission meetings of November 14, 2013 and December 12, 2013. Summaries of those comments and responses to each are provided at the end of this chapter, following the Response to Comment Letter 26.

Comment Letter 1



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

December 24, 2013

Ron Miller
City of Roseville
311 Vernon Street
Roseville, CA 95678

Subject: Fiddymont Ranch Specific Plan Amendment 3
SCH#: 2002082057

Dear Ron Miller:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. The review period closed on December 23, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1-1

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812 3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2002082057
Project Title Fiddymment Ranch Specific Plan Amendment 3
Lead Agency Roseville, City of

Type SIR Supplemental EIR
Description The project would amend the West Roseville Specific Plan to accommodate 1,661 additional residential units, bringing the total unit count in the Fiddymment Ranch area to 5,869. Project would add medium and high density residential and community commercial to the project area and adjust parcel sizes throughout.

Lead Agency Contact

Name Ron Miller
Agency City of Roseville
Phone 916 774 5276 **Fax**
email
Address 311 Vernon Street
City Roseville **State** CA **Zip** 95678

Project Location

County Placer
City Roseville
Region
Lat / Long 38° 48' 1.41" N / 121° 22' 3.22" W
Cross Streets Fiddymment Road & Blue Oaks, Hayden Parkway
Parcel No. several
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways Pleasant Grove Creek
Schools Junction ES and West Roseville HS
Land Use low density residential, public (schools), open space, parks

Project Issues Air Quality; Economics/Jobs; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Traffic/Circulation; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 2; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; California Highway Patrol; Caltrans, District 3 N; Department of Housing and Community Development; Air Resources Board; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 11/07/2013 **Start of Review** 11/07/2013 **End of Review** 12/23/2013

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EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

March 27, 2014

Ron Miller
City of Roseville
311 Vernon Street
Roseville, CA 95678

Subject: Fiddymt Ranch Specific Plan Amendment 3
SCH#: 2002082057

Dear Ron Miller:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 26, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov



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**Document Details Report
State Clearinghouse Data Base**

SCH# 2002082057
Project Title Fiddymment Ranch Specific Plan Amendment 3
Lead Agency Roseville, City of

Type SIR Supplemental EIR

Description The project would amend the West Roseville Specific Plan to accommodate 1,661 additional residential units, bringing the total unit count in the Fiddymment Ranch area to 5,869. Project would add medium and high density residential and community commercial to the project area and adjust parcel sizes throughout.

Lead Agency Contact

Name Ron Miller
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Phone 916 774 5276 **Fax**
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City Roseville
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Parcel No. several
Township

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Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 2; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 3 N; Department of Housing and Community Development; Air Resources Board; Air Resources Board, Major Industrial Projects; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 02/10/2014 **Start of Review** 02/10/2014 **End of Review** 03/26/2014



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Central Valley Regional Water Quality Control Board

14 March 2014

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STATE CLEARINGHOUSE

CERTIFIED MAIL
7013 1710 0002 3644 1059

Ron Miller
City of Roseville
311 Vernon Street
Roseville, CA 95678

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT, FIDDYMENT RANCH SPECIFIC PLAN AMENDMENT 3 PROJECT, SCH# 2002082057, PLACER COUNTY

Pursuant to the State Clearinghouse's 10 February 2014 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Subsequent Environmental Impact Report* for the Fiddymment Ranch Specific Plan Amendment 3 Project, located in Placer County.

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

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

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

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Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf



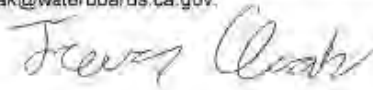
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Fiddymont Ranch Specific Plan
Amendment 3 Project
Placer County

- 4 -

14 March 2014

If you have questions regarding these comments, please contact me at (915) 464-4684 or
tcleak@waterboards.ca.gov.



Trevor Cleak
Environmental Scientist

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



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Cont.

Response to Comment Letter 1

State of California, Governor's Office of Planning and Research
Scott Morgan, Director
December 24, 2013 and March 26, 2014
and
California Water Boards, Central Valley Regional Water Quality Control Board
Trevor Cleak
March 14, 2014

1-1 The December 2013 comment states that the State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit (State Clearinghouse) submitted the RDSEIR to selected state agencies for review and that no comments were received by the State Clearinghouse from any state agencies prior to the close of the public review period on December 23, 2013. The March 2014 comment letter provides confirmation that the P2R was circulated to state agencies. A comment letter from the Central Valley Regional Water Quality Control Board was submitted to the State Clearinghouse during this public review period. That letter is addressed as Comment 1-2 below. The State Clearinghouse comment provides acknowledgement that the City of Roseville has complied with State Clearinghouse review requirements for draft environmental documents.

No comments on the content of the RDSEIR are provided in the State Clearinghouse letters. The comment is noted.

1-2 The comment letter from the Central Valley Regional Water Quality Control Board summarizes requirements related to the Construction Stormwater General Permit, Phase I and II Municipal Separate Storm Sewer System (MS4) Permits, the Industrial Storm Water General Permit, Clean Water Act Section 404 and 401 permits, Streambed Alteration Agreements, Waste Discharge Requirements, and National Pollutant Discharge Elimination System (NPDES) requirements related to dewatering activities.

As discussed on pages 14-19 and 28-33 of the Initial Study provided in Appendix of the RDSEIR, the effects of the proposed project related to hydrology, water quality, and biological resources were addressed in the West Roseville Specific Plan (WRSP) EIR. The permit requirements identified in the comment were described in the WRSP EIR and summarized in the Initial Study. The following table identifies the specific impact discussion from the WRSP and in the Initial Study where each applicable permit requirement is addressed. The project would not include any industrial land uses or dewatering activities, therefore those permits were not discussed in the WRSP EIR or the RDSEIR.

Water Quality Permit Discussions

Permit	WRSP EIR Impact	Initial Study Impact
Construction Stormwater General Permit, Waste Discharge Requirements	4.12-4 Erosion and Runoff from Construction Sites Containing Soil or Other Materials Could Degrade Water Quality if Discharged to Local Streams	Section IX, impacts a, c, and f
Phase I and II MS4 Permits	Impact 4.12-5 Changes in Surface Water or Groundwater Quality Resulting from Urban Stormwater Runoff	Section IX, impacts a, c, and f
Clean Water Act Section 404 and 401 permits, Streambed Alteration Agreements, Waste Discharge Requirements	Impact 4.7-1 Loss of Federally Protected Wetlands and "Other Waters" of the United States Impact 4.7-2 Loss of Federally Listed Vernal Pool Crustaceans and Their Habitat Impact 4.7-9 Loss of Riparian Habitat Impact 4.7-10 Loss of Biological Resources due to Construction of Off-Site Infrastructure	Section IV, impacts a, b and c



MIWOK United Auburn Indian Community
MAIDU of the Auburn Rancheria

Gene Whitehouse
Chairman

John L. Williams
Vice Chairman

Danny Ray
Secretary

Brenda Adams
Treasurer

Calvin Moman
Council Member

December 19, 2013

Ron Miller, Associate Planner
City of Roseville Planning Department
311 Vernon Street
Roseville, CA 95678

Subject: WRSP Fiddymment Ranch Phase 3 – Specific Plan Amendments and Draft Subsequent Environmental Impact Report

Dear Mr. Miller,

Thank you for requesting information regarding the above referenced project The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose tribal lands are within Placer County and whose service area includes El Dorado, Nevada, Placer, Sacramento, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects in your jurisdiction.

In order to ascertain whether or not the project could affect cultural resources that may be of importance to the UAIC, we would like to receive copies of any archaeological reports that have been, or will be, completed for the project. We also request copies of future environmental documents for the proposed project so that we have the opportunity to comment on potential impacts and proposed mitigation measures related to cultural resources. The information gathered will provide us with a better understanding of the project and cultural resources on site and is invaluable for consultation purposes. Please contact us if any Native American cultural resources are in, or found to be within, your project area.

Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the aforementioned documents as requested. Please contact Marcos Guerrero, Cultural Resources Manager, at (530) 883-2364 or email at mguerrero@auburnrancheria.com if you have any questions.

Sincerely,

Gene Whitehouse,
Chairman

CC: Marcos Guerrero, CRM

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Tribal Office 10720 Indian Hill Road Auburn, CA 95603 (530) 883-2390 FAX (530) 883-2380

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Response to Comment Letter 2

United Auburn Indian Community of the Auburn Rancheria
Gene Whitehouse, Chairman
December 19, 2013

- 2-1** The comment states that the United Auburn Indian Community (UAIC) is concerned about development within the tribal lands of the Miwok and Southern Maidu people. The UAIC requests to receive copies of any archaeological reports and environmental documents completed for the proposed project and requests that UAIC be contacted if any Native American cultural resources are in, or found to be within, the project site.

As described on pages 19 and 20 of the Initial Study included with the Notice of Preparation for the RDSEIR and provided in Appendix A to the RSDEIR, a cultural resources survey of the project site was conducted as part of the WRSP EIR and no cultural resources were identified within any portion of the WRSP, including the Fiddymment Ranch SPA 3 project area. The UAIC was previously provided the opportunity to review the cultural resources assessment for the WRSP. No changes to that document have been made and no additional archaeological reports have been prepared. All environmental documents prepared for the proposed project have been and will continue to be shared with the UAIC.

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19
SACRAMENTO, CA 95833
PHONE (916) 274-0638
FAX (916) 263-1796
TTY 711



*Flex your power!
Be energy efficient!*

December 19, 2013

032013-PLA-0138
2013PL-005
SCH# 2002082057

Mr. Ron Miller, Associate Planner
City of Roseville
Development Services Department - Planning Division
311 Vernon Street
Roseville, CA 95678

Fiddymment Ranch Specific Plan Amendment 3 – Draft Subsequent Environmental Impact Report (DSEIR)

Dear Mr. Miller:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the Fiddymment Ranch Specific Plan Amendment 3 DSEIR. The project proposes to amend the West Roseville Specific Plan (WRSP) to accommodate 1,661 additional residential units (580 Low Density Residential units, 609 Medium Density Residential Units, and 472 High Density Residential Units) in Fiddymment Ranch Phases 2 and 3. The revised land use plan will not change the footprint of the WRSP, but would redistribute certain land uses (LDR, LDR (Pocket Parks), MDR and HDR, CC, P/R, OS, P/Q-P, and Right-of-way) within the project area. In addition, the project proposes to change development densities within certain Fiddymment Ranch residential parcels. The project is located at 3000 Hayden Parkway in the City of Roseville, and is approximately 4 miles west of State Route (SR) 65 and 9 miles east of SR 99 / SR 70. The DSEIR states that this proposed amendment would increase trip generation by 15,337 daily trip ends compared to the level of development currently approved under the WRSP (Table 5.6, page 5-27), as well as an associated increase in greenhouse gas emissions. The following comments are based on the DSEIR received.

Project Assumptions and Timelines

We acknowledge the City of Roseville is a member of South Placer Regional Transportation Authority (SPRTA), which is a Joint Powers Authority comprised of the Cities of Lincoln, Rocklin, Roseville and the County of Placer, and is responsible for implementing a traffic impact fee program to fund specified long range regional transportation projects. Several of the key projects that are in the SPRTA capital improvement program are in close proximity to the Fiddymment Ranch Specific Plan development and will improve mobility within Placer County; however, the timing of this project in relation to other SPRTA projects has not been specified.

"Caltrans improves mobility across California"



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Mr. Miller, Development Services Department - Planning Division
Fiddymment Ranch Specific Plan Amendment 3 – Draft Subsequent Environmental Impact Report
(DSEIR)
December 19, 2013
Page 2

Traffic Operations

The DSEIR identifies the following significant and unavoidable impacts to the State Highway System:

Impact 5.12 (page 5-42), Increased Traffic Volumes on State Highways under Existing Plus Project Conditions, the DSEIR finds significant and unavoidable impacts to the following State Route (SR) 65 segments:

- I-80 to Galleria Boulevard
- Galleria Boulevard to Pleasant Grove Boulevard
- Pleasant Grove Boulevard to Blue Oaks Boulevard

Impact 5.17, (page 5-51), Increased Traffic Volumes on State Highways under 2025 CIP Plus Project Conditions, the DSEIR finds significant and unavoidable impacts to the following freeway segments:

- I-80 from Eureka Road to SR 65
- SR 65 from I-80 to Sunset Boulevard
- SR 70 / SR 99 / Riego Road to Elkhorn Boulevard / SR 99

Impact 11.8 (page 11-13), Increased Traffic Volumes on State Highways under 2025 Cumulative Plus Project Conditions, the DSEIR finds significant and unavoidable impacts to the following freeway segments:

- I-80 from Eureka Road to SR 65
- SR 65 from I-80 to Blue Oaks Boulevard
- SR 70 / SR 99 / Riego Road to Elkhorn Boulevard / SR 99

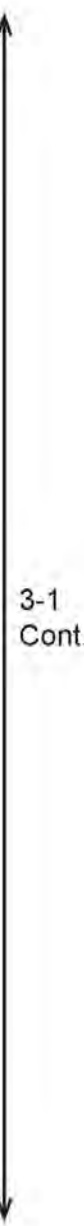
Mitigation Measure 5.12 states “The City of Roseville shall negotiate in good faith to enter into fair and reasonable arrangements with Caltrans with the intention of achieving within a reasonable time period after approval of the proposed project commitment for the provision of adequate fair share mitigation from applicants for tentative map approval within the area affected by the proposed Fiddymment Ranch SPA 3 project to provide for the construction of interchange improvements along SR 65 consistent with the Mitigation Fee Act (Government Code, § 66000 et seq.).”

Mitigation Measure 11.8 calls for a similar enforceable agreement to mitigate against cumulative plus project impacts.

The original WRSP was adopted by the City in February 2004. While Caltrans owns, operates, and maintains State Highway System facilities, the City of Roseville can choose to lead an analysis and ultimately develop and implement shorter term operational improvements that would better manage trip distribution from the proposed development. For instance, the City of Roseville may want to consider studying the feasibility of implementing the following project concepts:

- Auxiliary lanes on SR 65 (Northbound and Southbound) between Galleria Boulevard and Pleasant Grove Boulevard,

“Caltrans improves mobility across California”



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Mr. Miller, Development Services Department - Planning Division
Fiddymnt Ranch Specific Plan Amendment 3 – Draft Subsequent Environmental Impact Report (DSEIR)
December 19, 2013
Page 3

- Auxiliary lanes on SR 65 (Northbound and Southbound) between Blue Oaks Boulevard and Sunset Boulevard, and
- Auxiliary lanes on SR65 (Northbound and Southbound) between Sunset Boulevard to Whitney Ranch Road.

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

If you have any questions regarding these comments or require additional information, please contact Jeffrey Morneau, Intergovernmental Review Coordinator for Placer County at (916) 274-0679 or by email at: jeffrey.morneau@dot.ca.gov.

Sincerely,



MARLO TINNEY
Chief, Office of Transportation Planning – East

Cc: Scott Morgan, State Clearinghouse

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"Caltrans improves mobility across California"

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Response to Comment Letter 3

California Department of Transportation

District 3 – Sacramento Area Office

Marlo Tinney, Chief, Office of Transportation Planning – East

December 19, 2013

- 3-1** The comment summarizes the proposed project and the vehicle trips expected to be generated by the project. The comment also recognizes the City of Roseville’s participation in the South Placer Regional Transportation Authority. The comment summarizes the significant and unavoidable impacts to nearby State Highways to which the project would contribute, as identified and analyzed in the RDSEIR. The comment suggests that the City consider the feasibility of implementing three project concepts involving the addition of auxiliary lanes to segments of SR 65. The comment states that these suggested improvements would lead to better management of trip distribution from the proposed development.

The first suggested project concept suggested by the commenter for study by the City involves adding auxiliary lanes to SR 65 between Galleria Boulevard and Pleasant Grove Boulevard. This would likely be capable of improving the Level of Service (LOS) on this segment of SR 65 to LOS E both with and without the proposed project. As shown in Table 5.12 of the RDSEIR, the existing volume on this segment of SR 65 is 116,100 average daily trips (ADT). As shown in Table 5.3 of the RDSEIR, a six-lane freeway with ADT of 120,000 or below would operate at LOS E, which is considered an acceptable LOS for this facility, as stated on page 5-18 of the RDSEIR. The proposed project would contribute approximately 900 ADT to this segment of SR 65, which is a less than 1% increase in ADT.

Pursuant to CEQA Guidelines Section 15041(a), the lead agency has the authority to adopt mitigation measures consistent with applicable constitutional requirements such as the “nexus” and “rough proportionality” standards established by case law. This means that the mitigation requirements must reflect the extent of the project’s contribution to the associated impact.

Requiring the proposed project to be fully responsible for construction of auxiliary lanes on SR 65 between Galleria Boulevard and Pleasant Grove Boulevard would not meet the standards in CEQA Guidelines Section 15041(a), because the addition of 900 daily trips to the segment by itself would not warrant payment of the entire cost to construct two new freeway lanes. Rather, it would be appropriate for the project to contribute its fair share of costs for this improvement. There are no current plans to construct this improvement, however, and no current funding agreements to provide for fair share contributions. Accordingly, Mitigation Measure 5.12a, which requires the City to work with Caltrans to develop such plans and funding agreements and requires fair share contributions at the time of future tentative map approvals if plans and funding agreements are established at that time, is appropriate mitigation. A minor amendment was made to Mitigation Measure 5.12a, as reflected in Chapter 3

of this Final Subsequent EIR. Specifically, the word “interchange” was removed from the measure to ensure that this measure is applicable to improvements to segments of SR 65 as well as interchanges. Plans and funding agreements developed under Mitigation Measure 5.12a could include the suggested project concept of adding auxiliary lanes to this segment of SR 65.

The other two suggested project concepts suggested by the commenter for study by the City would affect segments of SR 65 north of Blue Oaks Boulevard. The RDSEIR did not identify any significant impacts on that portion of SR 65, however. Therefore, there is no nexus between these suggested improvements and the impacts of the proposed project.

The City appreciates the suggestions regarding potential improvements to SR 65 and will consider the commenter’s recommendations. While the comment does not suggest that these improvement project concepts should be required as mitigation measures to address the project’s impacts, it is noted that these concepts would not be appropriate mitigation measures for the proposed project for the reasons explained above.



WESTERN PLACER
WASTE MANAGEMENT AUTHORITY

ROBERT WEYGANDT, PLACER COUNTY, CHAIRMAN
GEORGE MAGNUSON, ROCKLIN
PAUL JOINET, LINCOLN
SUSAN ROHAN, ROSEVILLE
JACK DURAN, PLACER COUNTY
JAMES DURFEE, EXECUTIVE DIRECTOR

December 16, 2013

Ron Miller, Associate Planner
City of Roseville Planning Department
311 Vernon Street
Roseville, CA 95678

**RE: FIDDYMENT RANCH SPECIFIC PLAN AMENDMENT 3 – SUBSEQUENT
DRAFT ENVIRONMENTAL IMPACT REPORT (SDEIR)**

Dear Mr. Miller:

Thank you for providing us with the opportunity to review the above mentioned SDEIR. The Western Placer Waste Management Authority (WPWMA) is a regional agency comprised of Placer County and the Cities of Roseville, Rocklin and Lincoln. WPWMA provides recycling and waste disposal opportunities to those communities as well as the Cities of Auburn and Colfax, and the Town of Loomis.

We understand the project proposes changes in land use designations, and an amendment to the West Roseville Specific Plan (WRSP), to accommodate up to 1,661 additional residential units in the area referred to as Fiddymment Ranch.

As stated in the SDEIR, development of the project will increase the demand for solid waste disposal services. As such, the project is still anticipated to have significant and unavoidable environmental impacts on the Western Regional Sanitary Landfill and Materials Recovery Facility, as described in the original West Roseville Specific Plan EIR. While the impacts related to solid waste disposal are not evaluated further in the SDEIR, the WRSP may have outdated information about WPWMA and its facilities. Below is updated information about WPWMA and the services it provides:

The WRSL is permitted to accept 1,900 tons per day and 624 vehicles per day; it currently receives an average of 803 tons per weekday and 94 vehicles per day (2012 average). The landfill has a permitted design capacity of 36,350,000 cubic yards and a remaining capacity of 25,677,557 cubic yards (July 2013). Under current land use and development conditions, the landfill has a permitted lifespan extending to 2058.

The MRF has a permitted processing capacity of 1,750 tons per day and 1,014 vehicles per day; for the period of January 1 through December 31, 2012, the average weekday

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WWW.WPWMA.COM

4-1

Ron Miller, Associate Planner
City of Roseville Planning Department
Fiddymment Ranch Specific Plan Amendment 3 – Subsequent Draft Environmental Impact Report (SDEIR)
December 16, 2013
Page 2

tonnage received at the MRF was 1,064 tons and the average weekday vehicle count at the MRF was 520. The MRF expanded in 2007, increasing its processing capacity of municipal solid waste and construction and demolition debris to 2,200 tons per day. The compost portion facility of the facility has a permitted processing capacity of 75,000 cubic yards or approximately 37,500 tons and a design capacity of approximately 164,000 cubic yards or 82,000 tons.

The MRF typically diverts approximately 30 percent from the MRF processing lines; however this does not include the additional recyclables received and diverted via the facility's buy-back center, drop-off center, compost facility, and landfill diversion (inert waste and construction/demolition waste). The facility-wide diversion rate achieved in 2012 was over 44 percent.

Thank you again for the opportunity to review the Subsequent EIR. Should you have any questions, please do not hesitate to call me at 530-886-4984.

Sincerely,



Rebecca Lillis
Environmental Resource Specialist

CC: Eric Oddo, Western Placer Waste Management Authority
Maywan Krach, Placer County Community Development Resources Agency



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Cont.

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Response to Comment Letter 4

**Western Placer Waste Management Authority
Rebecca Lillis, Environmental Resource Specialist
December 16, 2013**

- 4-1** The comment reiterates the RDSEIR's statement that the proposed project would increase the demand for solid waste disposal services. The comment expresses that the WRSP and the WRSP EIR may reference outdated information about the Western Placer Waste Management Authority (WPWMA) and its facilities. The comment subsequently provides current statistics for the WPWMA's Western Regional Sanitary Landfill (WRSL) and Materials Recovery Facility (MRF).

The Initial Study for the RDSEIR incorporates and updates analysis from the WRSP EIR. The analysis in the Initial Study, which is provided in Appendix A to the RDSEIR, is also briefly summarized on page 9-1 of the RDSEIR. The majority of information provided in the RDSEIR and Initial Study about solid waste disposal services involve projections of anticipated waste generation under the buildout conditions of the Fiddymment Ranch SPA 3 project. However, information about the daily processing, remaining capacity, and anticipated lifespans of the WRSL and the MRF also is provided on pages 44 and 45 of the Initial Study and on page 9-1 of the RDSEIR. The current daily processing capacity of the MRF was identified accurately in the Initial Study as 2,200 tons per day. (Initial Study, p. 44.) The Initial Study states that in 2008, the average tonnage processed by the MRF was 1,076 tons per week day, while the comment states that the average weekday tonnage received at the MRF was 1,064 tons in 2012 and that the WRSL has a permitted lifespan extending to 2042. (Initial Study, p. 44.) The RDSEIR reported that the WRSL has a remaining capacity of 25,438,634 cubic yard and a lifespan extending to 2041 (RDSEIR p. 9-1). The WPWMA letter clarifies that the WRSL has a remaining capacity of 25,677,557 cubic yards as of July 2013 and has a permitted lifespan extending to 2058.

The City appreciates the updated information provided by the WPWMA. The updated weekday tonnage received, capacity and lifespan data represents minor changes from the information presented in the Initial Study and does not affect the impact analysis or conclusions reached in the Initial Study. For accuracy and clarification, the capacity and lifespan information on page 9-1 in the RDSEIR has been updated, as shown in Chapter 3 of this Final Subsequent EIR.

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PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Ken Grehm, Executive Director
Brian Keating, District Engineer
Andrew Darrow, Development Coordinator

December 23, 2013

Ron Miller
City of Roseville
Planning Division
311 Vernon Street
Roseville, CA 95678

RE: WRSP Fiddymment Ranch Phase 3 / SPA-000049

Ron:

The District has reviewed the proposed specific plan amendment for the West Roseville Specific Plan (WRSP) area and has the following comments.

The applicant is proposing to amend the WRSP area to add an additional 1,661 residential units in Fiddymment Ranch Phases 2 and 3. The District requests that the applicant update the project's hydrologic analysis and revise any currently proposed peak runoff and volumetric mitigation measures as necessary.

Please provide the District with any updates to the Drainage Master Plan and/or future environmental documents for the West Roaseville Specific Plan for our review and comment.

A handwritten signature in blue ink, appearing to read "Andrew Darrow".

Andrew Darrow, P.E., CFM
Development Coordinator

d:\data\letters\cn13-06.doc

5-1

3091 County Center Drive, Suite 220 / Auburn, CA 95603 / Tel: (530) 745-7541 / Fax: (530) 745-3531

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Response to Comment Letter 5

**Placer County Flood Control and Water Conservation District
Andrew Darrow, P.E., CFM, Development Coordinator
December 23, 2013**

5-1 The comment requests a revision to the project's hydrologic analysis to include any changes to the anticipated peak stormwater runoff rates and volume due to the increased number of residential units proposed for Fiddymment Ranch. The comment also requests that the City submit the Drainage Master Plan to the District for review and comment.

As stated in the Initial Study prepared for the RDSEIR (and provided in Appendix A to the RDSEIR), the WRSP EIR concluded that the increase in peak stormwater runoff rates associated with development of Fiddymment Ranch under the WRSP would not contribute to downstream flooding impacts. As discussed on page 31 of the Initial Study, the peak flow from the WRSP area would pass through Pleasant Grove Creek ahead of the peak flow from the watershed upstream of the WRSP area. This would decrease the potential for the two separate peak flows to coincide in downstream areas and either cause or exacerbate flooding. Therefore, no onsite detention or retention of the peak runoff from the project is required.

The Initial Study prepared for the RDSEIR also provides an updated stormwater runoff volume for Fiddymment Ranch based on the land use plan under the proposed Specific Plan Amendment. Under the adopted WRSP, projected stormwater runoff volume for the Fiddymment Ranch development would be 172.4 acre-feet per year. As discussed in Section IX impacts d and e of the Initial Study for the RDSEIR, the proposed project would result in an increase of 5.46 acre-feet of stormwater runoff per year, for a total runoff volume of 177.86 acre-feet per year. The Initial Study summarizes the WRSP EIR evaluation of ***Impact 4.12-2 Increase in the Amount of Surface Runoff, Which Would Exceed the Capacity of Existing Storm Drainage Systems and Increase the Potential for Downstream Flooding*** and concludes that this impact would remain less than significant with implementation of WRSP EIR Mitigation Measure 4.12-2, which requires that all development within the WRSP contribute a proportionate amount, at the time that building permits are issued, to fund development of the regional retention basin. (Initial Study, p. 31.)

In December 2011, the City complied with an earlier request from the Flood Control District to submit the Drainage Master Plan to the District for review and comment by requesting the engineer that prepared to study (Wood Rodgers, Inc.) to forward a copy directly to the District for review.

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Thomas J. Christofk, Air Pollution Control Officer

December 23, 2013

SENT VIA E-MAIL: rmiller@roseville.ca.us

Ron Miller, Associate Planner
City of Roseville - Planning Division
311 Vernon Street
Roseville, CA 95678

**SUBJECT: Fiddymment Ranch Phase 3 Specific Plan Amendment,
Draft Environmental Impact Report**

Mr. Miller:

Thank you for submitting the Fiddymment Ranch Phase 3 Specific Plan Amendment (Project) and associated Draft Environmental Impact Report (DEIR) to the Placer County Air Pollution Control District (District) for review and comment. The applicant requests approval of a Specific Plan Amendment (SPA), General Plan Amendment (GPA), Rezone (RZ), Tentative Subdivision Map (SUB), and Development Agreement Amendment (DAA) which would allow for the addition of 1,661 additional units within the Fiddymment Ranch portion of the West Roseville Specific Plan (WRSP). The District provides the following comments on the DEIR.

Chapter 7 Air Quality

1. The conclusion for Impact 7.2 conflicts with the impact analysis prepared for the Project's related PM10 emissions.

The Project is located within the Sacramento Valley Air Basin (SVAB) which is classified as nonattainment for State PM10 and Federal PM2.5 standards. Within the discussion for Impact 7.2, the DEIR states¹:

"However, the proposed project would generate emissions of PM10 that exceed the APCD thresholds. There are no fee programs established to reduce PM10 emissions and no other feasible mitigation measures are available to reduce, offset, or avoid these emissions. Therefore, the project has a significant and unavoidable impact with respect to PM10 emissions and the potential to contribute to violate of PM10 air quality standards."

According to the above statement, the DEIR's analysis identifies that the Project will have a significant and unavoidable impact for its related PM10 emissions, as shown in Section 7, Table 7-10. However, the DEIR concludes Impact 7.2 is less-than-significant. This conclusion directly conflicts with the DEIR's own analysis. District recommends that the conclusion in the DEIR for Impact 7.2 be revised to be consistent with its analysis as described above.

¹ DEIR page 7-25

6-1

Placer County Air Pollution Control District
December 23, 2013
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2. The District has concern that Mitigation Measure 7.2b may not provide sufficient mitigation to reduce the Project's related ROG and NOx emissions for Impact 7.2.

The DEIR uses the District's recommended significance thresholds (82 lbs per day) to evaluate air quality impacts associated the Project. When utilizing these thresholds, a less-than-significant conclusion could be made if the Project's related emissions, after mitigation, are below the thresholds for the entire operational phase (e.g., project lifetime).

The DEIR determines the impact is less-than-significant after mitigation based on the following analysis²:

"Implementation of Mitigation Measure 7.2a would reduce operational emissions, but not to a level considered less than significant. Therefore the project applicant will be required to implement Mitigation Measure 7.2b which requires payment of fees into the Placer County APCD. Payment of the fee required under Mitigation Measure 7.2b would offset the project's operational emissions of ROG and NOX, ensuring that project impacts would be reduced to a less than significant level and that the project does not contribute to violations of air quality standards for ROG and NOx."

However, the Project's 2035 operational NOx emission, for example, would be 94.13 lbs per day, which would still exceed 82 lbs per day³. Therefore, the Project's related operational NOx emissions would continue exceeding 82 lbs per day for 15 years until 2035, not a half-year period (i.e., 182 days) which was used in Mitigation Measure 7.2b to calculate the necessary emission reduction. Based on this finding, the DEIR will need to identify additional emission reductions to mitigate the Project's related NOx emissions below 82 lbs per day through the Project's lifetime.

The District recommends that the DEIR provide additional calculations to quantify the total necessary emission reductions or other feasible mitigation measures to demonstrate that Mitigation Measure 7.2b will generate enough reduction to mitigate the Project's operational ROG and NOx emissions below 82 lbs. per day.

3. The DEIR does not need to implement Mitigation Measure 7.1c. for Low VOC Architectural Coating.

In 2010, the District Board took action to amend District Rule 218: Architectural Coating, which requires low VOC content compound (as identified in Mitigation Measure 7.1c) for architectural coating compounds within Placer County. The Rule Amendment is consistent with the Suggested Control Measure made by California Air Resources Board (CARB). As Rule 218 has been identified under "Local Regulations" section, the DEIR should not list it again as proposed mitigation measure.

² DEIR page 7-25

³ Analysis conducted by District Staff based on the modeling input file provided by the consultant. City of Roseville, Fiddymont Ranch Specific Plan Amendment 3, DEIR

6-2

6-3

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4. The DEIR should provide winter-time project-related emissions.

Table 7.10 includes the Project's related emissions in a summer-time period and does not provide the winter-time emissions. The District recommends that the DEIR include winter-time emissions in order to identify whether or not the Project's related winter-time emissions would exceed 82 lbs. per day.

5. Table 7.10 inadvertently shows "Construction Threshold" in the Category column, when it should read "Operational Threshold".

Chapter 8 Climate Change

6. The DEIR's analysis conflicts with its own interpretation of the "Business-As-Usual" (BAU) scenario to determine the Project's related GHG impacts.

The DEIR uses CARB's Revised Scoping Plan target reduction of 21% compared to the projected BAU in 2020 as the threshold of significance to determine the Project's related GHG impacts. The DEIR interprets the BAU scenario as follows:

"...projected BAU levels based on conditions existing in 2010 in order to meet the statewide GHG emission reduction targets."⁴

Accordingly, the emission estimation for the BAU scenario should be based on the existing land use conditions in 2010 as approved in the WRSP. However, the DEIR prepares the BAU scenario analysis based on a total of 2,949 residential units, including the approved land uses in 2010 (1,288 units) as well as the proposed addition of 1,661 residential units. The additional units have not yet been approved by the City. Therefore, the DEIR BAU scenario analysis does not correlate with its own statement relating to the "condition existing in 2010".

The District recommends that the Project's BAU scenario analysis should be revised based on the approved residential units (1,288) under General Plan and WRSP in 2010. This approach would be consistent with the methodology used by CARB for determining the BAU projection and shall be able to generate comparable results with the thresholds derived from the 2011 CARB Scoping Plan Update.

The BAU projection identified by CARB within the 2011 Scoping Plan Update is calculated based on the existing statewide emissions with growth patterns and housing units deriving from land use plans, such as General Plans, as they were anticipated in 2010. Because the Project proposes a General Plan Amendment to add an additional 1,661 residential units into the planning area, the proposed amendment is not anticipated by the City's General Plan and WRSP in 2010. Likewise, the proposed land use changes are not anticipated with the CARB BAU growth assumptions; using proposed land changes for BAU scenario analysis could overestimate the BAU emission projections and result in an unrealistic depiction of emission reductions, or increases, when compared to the 2020 projections. Consequently, the BAU scenario for the Project

⁴ DEIR page 8-16
City of Roseville, Fiddymont Ranch Specific Plan Amendment 3, DEIR

6-3
Cont.

6-4

should be based on the conditions existing in 2010, including the control strategies and existing land use zoning and designations anticipated within the City's General Plan or the WRSP, which allowed for 1,288 residential units. Any proposed amendment which was not approved before 2010 should not be used for the BAU scenario analysis.

This BAU analysis approach is consistent with other air districts who recommend the BAU scenario analysis for CEQA land use GHG emission impacts. The Bay Area Air Quality Management District (BAAQMD), for example, recommends that the baseline year [or BAU] is based on the existing growth pattern defined by an existing general plan⁵.

Additionally, recent court cases have favored the use of BAU scenarios when based on realistic assumptions, taking into account existing local planning and zoning regulations. In *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011)⁶, where the project proposed to demolish and construct in its place a larger Target store, the court endorsed the use of the existing store as BAU conditions for assessing the significance of a project's GHG emissions impacts, so long as the scenario used is credible based on what existed in the baseline year, or the existing project, not a hypothetical scenario of the "proposed project". Other courts have stated that the BAU must be either existing conditions or reasonably likely conditions but not a "hypothetical" BAU scenario. In *Friends of the Northern San Jacinto Valley et al. v. County of Riverside* (2012)⁷, the court found that the project EIR used an unrealistic "worst case" scenario that ignored local planning and zoning laws.

The District notes for a recently approved project, Westpark Phase 4 Amendment, which also proposed an amendment of the WRSP, the BAU analysis was based on currently approved land use zoning in the WRSP⁸. Because the Project is also located within WRSP, the District recommends the DEIR should consider using consistent methodologies to determine the Project's related GHG impacts.

In conclusion, the District recommends that the Project's BAU scenario analysis be revised based on the approved residential units (1,288) under General Plan and WRSP in 2010. The DEIR should re-verify the percent reduction from the BAU scenario for the proposed project's GHG emissions and identify any necessary additional mitigation measures necessary to achieve the 21% reduction goal.



⁵ BAAQMD CEQA Air Quality Guidance, page 4-8
http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_Final_May%202012.aspx?la=en

⁶ *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327
<http://www.sheppardmullin.com/assets/attachments/Citizens%20-%20Opinion.pdf>

⁷ *Friends of the Northern San Jacinto Valley et al. v. County of Riverside* (2012)
<http://www.northfriends.org/Proposed/Statement-of-Decision.pdf>

⁸ Roseville City Council meeting of July 17, 2013, Item 12.1 Table 5 and 6 of the Initial Study, starting from Page 506.
<http://www.roseville.ca.us/civicax/filebank/blobload.aspx?BlobID=27053>
City of Roseville, Fiddymont Ranch Specific Plan Amendment 3, DEIR

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7. The emissions summaries in DEIR are not consistent with Appendix D modeling outputs.

The Project's GHG operational emissions summarized in Table 8.2 and 8.3 are not consistent with the CalEEMod outputs provided in Appendix D. For example, Table 8.2 summaries that total operational emissions (excluding maximum annual construction emissions) are 46,110.3 MT/year for the Project's 2010 BAU scenario emissions but the modeling outputs provide by Appendix D are 50,827.77 MT/year. In addition, the DEIR discussion does not provide the process how the maximum annual construction emissions being calculated. Please provide a quantitative discussion, or table, to indicate the emission reductions calculated outside of the model outputs from CalEEMod.

6-7

Chapter 11 Cumulative Impacts

8. The impact statement for Impact 11.10 conflicts with the significance determination for operational-related cumulative impacts.

The DEIR analysis indicates that the Project's Cumulative Impacts are Significant and Unavoidable after mitigation within the impact statement for Impact 11.10. However, the DEIR states that after implementation of Mitigation Measure 11.10a, the Project's contribution to cumulative air pollutant concentrations would be reduced to a level that is not cumulatively considerable and therefore the Project's contribution to cumulative impacts would be less-than-significant⁹. This conclusion conflicts with the significant and unavoidable determination for Impact 11.10. The District recommends that the DEIR should specifically identify which source of emissions from the Project would be still cumulative considerable after mitigation.

9. The DEIR does not include an analysis or discussion for the PM10 emissions in its Cumulative Impact discussion.

The cumulative section should analyze all emissions for which the region is designated as nonattainment and where the Project's operational emissions would exceed the District's Recommended Project-level thresholds. As stated in the DEIR, the Project is located within the SVAB which is designated as nonattainment for the State PM10 and Federal PM2.5 standards. Furthermore, the analysis for Impact 7.2 identifies that the Project's PM emissions cannot be reduced to a less-than-significant level. The District recommends that the Project's related PM10 emission should be included in the cumulative section.

6-8

10. The District recommends the DEIR and Mitigation Measure 11.10a include reference to the two developer agreement requirements.

The DEIR states that the Project development would be subject to the litigation regarding the City's approval of the WRSP, where a payment of \$125 is required. The fee amount is not consistent with the Section 3.27 "Air Quality Mitigation Fee" under the existing Fiddymont Park Development Agreement requirements for collection of \$134.10 for

⁹ DEIR page 11-21
City of Roseville, Fiddymont Ranch Specific Plan Amendment 3, DEIR

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payment of the Settlement Agreement.¹⁰ Please clarify.

In addition, the District recommends the DEIR include discussion of the two air quality mitigation fee requirements (Section 3.15.11 "Air Quality Program" and 3.27 "Air Quality Mitigation Fee") under the existing Development Agreements for consistency within the WRSP area.

11. The District has concern that Mitigation Measure 11.10a may not provide sufficient mitigation for the Project to reduce its cumulative impacts.

Using the District's recommended cumulative threshold (10 lbs per day), the DEIR concludes that the Project's cumulative-operational emissions impacts would be reduced to a less than significant level after implementation of Mitigation Measure 11.10a (same measure as Mitigation Measure 7.2b). As previously discussion in Comment #2, the proposed amount of emission reductions from the proposed mitigation would not be sufficient to reduce the Project's operational ROG and NOx emissions below 82 lbs per day during the project lifetime. Likewise, the proposed mitigation will also not reduce the Project's related ROG and NOx emission below 10 lbs per day. The District recommends the DEIR provide additional quantitative analysis in order to demonstrate that the proposed mitigation would sufficiently reduce the Project's related operational emissions.

CalEEMod Analyses

12. The Construction Mitigation Report should be made available within the appendices of the DEIR.

The modeling analysis prepared for the Project incorporated mitigation measures to reduce construction emissions. All measures selected within the model should be implemented as mitigation measures within the DEIR to demonstrate construction emission reductions. Because the Construction Mitigation Report is not included within the submittals, the District is not able to verify that all measures select to reduce emissions within the model are proposed as measures within the DEIR.

13. Mitigation measures identified to reduce construction related impacts may not be feasible and may be difficult to enforce.

Mitigation Measure 7.1b includes the requirement that construction equipment use oxidation catalysts, as assumed within the model. The modeling output for the various construction phases assumes use of an oxidation catalyst for construction equipment. The analysis demonstrates that with the implementation of this measure, the Project's construction-related NOx emissions would be substantially reduced by 17.5%. This measure may be economically unfeasible for small construction companies to implement. Furthermore, it is not clear how this measure would be enforced or monitored.



¹⁰ The Fiddymment Park Development Agreement first Amendment on January 4th, 2006
<http://www.roseville.ca.us/civicaux/filesbank/fbfbdbload.aspx?Bf0b1D=16139>
City of Roseville, Fiddymment Ranch Specific Plan Amendment 3, DEIR

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The District recommends the analysis include assumptions for partial use oxidation catalyst to reduce the burden placed on small construction companies who might not be able to conform to this measure. The model could instead, incorporate the District's recommended emission reductions for NOx and PM as described in Mitigation Measure 7.1a. Details pertaining to this measure should be included in the Construction Mitigation Report.

↑
6-10
Cont.

14. CalEEMod land use settings for both BAU and 2020 Projection scenarios should be consistent.

Both BAU and 2020 Projection scenarios should use all planning area characteristics in the Land Use Mitigation Tab that would apply to either scenario which would occur without any discretion or entitlement action. This would include any identified mitigation measures, such as traffic calming enhancements, which were required as part of the WRSP 2005 approval.

6-11

15. The Appendix D in the DEIR should include detailed calculations for the emission reduction benefits assumed with implementation of Mitigation Measure 8.1a and 8.1b.

6-12

FR SPA 3 Buildout Operational 2020, Mitigation Report

16. The Construction Mitigation Reports should be included in Appendix D of the DEIR.

The District recognizes that the Construction Mitigation Report provided in Appendix D of the DEIR is not applicable to the Project. As stated above, mitigation reports for the construction-related phases of the Project should be made available for review to ensure the DEIR is implementing all mitigation measures selected within the model.

6-13

Thank you for allowing the District this opportunity to review the project proposal. Please do not hesitate to contact me at 530.745.2333 or agreen@placer.ca.gov if you have any questions.

Sincerely,



Angel Green
Associate Planner
Planning & Monitoring Section

cc: Yu-Shuo Chang, Planning & Monitoring Section Supervisor

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Response to Comment Letter 6

**Placer County Air Pollution Control District
Angel Green, Associate Planner, Planning & Monitoring Section
December 23, 2013**

- 6-1** The comment identifies a discrepancy in the RDSEIR regarding whether the project's particulate matter (PM10) emissions would result in a significant impact.

The P2R included a revised Chapter 7 Air Quality. The revisions to Chapter 7 corrected the identified discrepancy. Specifically, the significance of PM10 emissions is identified on page 7R-24 and 7R-27 in the discussion of Impact 7.2.

- 6-2** The comment states that Mitigation Measure 7.2b is not sufficient to reduce the project's reactive organic gases (ROG) and oxides of nitrogen (NOx) emissions to a less than significant level.

The P2R included a revised Chapter 7 Air Quality. The revisions to Chapter 7 included changing the conclusion for Impact 7.2 from a less than significant impact as identified in the RDSEIR to a significant and unavoidable impact in the P2R, as shown on page 7R-24.

- 6-3** The comment recommends three revisions to the RDSEIR Chapter 7 Air Quality: 1) Mitigation Measure 7.2c is not necessary because APCD Rule 218 requires that architectural coating compounds sold within Placer County have low volatile organic compound (VOC) content; 2) Table 7.10 should include winter-time emissions; and 3) the label "Construction Threshold" in Table 7.10 should be "Operational Threshold."

The revisions to Chapter 7 Air Quality presented in the P2R address all three suggestions. Specifically, Mitigation Measure 7.2c was removed, winter-time emissions were added to Table 7.10, and the label in Table 7.10 was corrected.

- 6-4** With respect to climate change and greenhouse gas (GHG) emissions, the comment states that in order to determine whether the project is achieving the California Air Resources Board (CARB) revised Scoping Plan target reduction of 21% compared to the GHG emissions from a projected Business as Usual (BAU) scenario in 2020, the emissions estimates for the BAU scenario should be based on the approved land uses for the project site as of 2010. In other words, the commenter states that the BAU scenario from which to evaluate the project's impacts should assume buildout of the currently approved land uses for the project site (i.e., the WRSP and not the changes proposed by the project). The comment states that this methodology is recommended for consistency with the methodology used to update population growth projections and land use assumptions in the CARB 2011 Scoping Plan Update. The comment further states that the growth projections and land use assumptions in the CARB 2011 Scoping Plan Update are based on local jurisdictions' land use plans (such as General Plans) that were adopted as of 2010.

While the comment refers to the “2011 Scoping Plan Update,” the Climate Change Scoping Plan (CARB 2009) was first published in December 2008 and approved in May 2009. A Functionally Equivalent Document (or “FED,” which is a CEQA-equivalent document that provides the same type of information that would be provided in an EIR) was also adopted in 2009. In 2011, CARB adopted a Final Supplement to the Scoping Plan FED and reapproved the Scoping Plan. As described on page 2 of the 2011 Final Supplement to the FED, minor revisions were made to the Scoping Plan to omit two emission reduction measures – a refrigerant management program and a fee on high-global-warming-potential gases. The revised target reduction of 21% compared to BAU, the threshold used in this RDSEIR, is based on the analysis in the 2011 Final Supplement to the FED.

The Scoping Plan is intended to identify a framework to reduce GHG emissions throughout California to attain the targets set by the 2006 Global Warming Solutions Act (also referred to as AB 32). The Scoping Plan recognizes that population growth and land development will continue to occur, and does not assume that the land use conditions (e.g., land use and zoning designations) present in 2010 will govern all future development in the state.

Further, the land use assumptions in the Scoping Plan are not based on General Plans and other local land use plans as suggested in the comment. As the 2011 Final Supplement to the Scoping Plan FED explains, the projected 2020 BAU emissions on which the 21% reduction target is calculated were updated “based on current economic forecasts (i.e., as influenced by the economic downturn) and reduction measures already in place” (2011 Final Supplement to FED, p 10-11). The methodology used to prepare the original 2020 forecast is discussed in more detail in the 2008 Scoping Plan FED, which is presented in Appendix F to the 2008 Scoping Plan. Page F-3 of Appendix F to the 2008 Scoping Plan identifies the data sources used for the BAU assumptions, as follows:

“Growth factors are sector-specific and are derived from several sources, including the energy demand models generated by California Energy Commission (CEC) for their 2007 Integrated Energy Policy Report (IEPR), business economic growth data developed for ARB’s criteria pollutant forecast system (CPFS), population growth data from the California Department of Finance, and projections of vehicle miles traveled from ARB’s on-road mobile source emissions model, EMFAC2007. For the electricity and other energy sectors, ARB consulted with CEC to select the most appropriate growth factor.

ARB’s forecasting method is similar to other GHG forecasting approaches, including the method used in the Climate Action Team 2006 Report. Where appropriate, ARB used updated and improved growth factors for estimating 2020 emissions sector-by-sector. These future emissions are projected in the absence of any policies or actions that would reduce emissions. The resulting BAU estimates are compared to the 2020 target set by the Board in December

2007 to determine the total statewide GHG reductions needed.” (Emphasis added.)

While the 2011 Final Supplement to the FED updated the projected 2020 GHG emissions to reflect the economic downturn and adopted GHG reduction measures, it did not change the basic methodology for calculating future emissions. Specifically, sector-specific growth factors were used rather than a detailed growth forecast based on local land use plans. As stated on page 10 of the 2011 Final Supplement to the FED:

“ARB staff derived the updated emissions estimates by projecting emissions from a past baseline estimate using three-year average emissions, by sector, for 2006-2008 and considering the influence of the recent recession and reduction measures that are already in place. Growth factors specific to each of the different economic sectors were used to forecast emissions to 2020.”

Hence, the revised growth projections presented in the 2011 Final Supplement to the FED are not based on adopted General Plans and other land use plans and do not reflect an assumption that all future land development would occur only in compliance with existing land use and zoning designations. Rather, the updated 2020 BAU forecast assumed that the regulatory conditions governing GHG emissions (“policies and actions”) existing in 2010 would be held constant. The GHG emissions estimate for the 2020 BAU scenario was based on applying the sector-specific growth factors to the 2006-2008 statewide GHG inventory to forecast each sector’s 2020 GHG emissions, based on the 2010 GHG regulatory conditions. The percent reduction in statewide GHG emissions that must be met to achieve the AB 32 target is calculated based on the difference between the 2020 BAU emissions estimate and the emissions target (which is defined in AB 32 as the level of GHG emissions that occurred in 1990).

To further understand the BAU scenario, it is useful to consider the “no project” scenario in the 2011 Final Supplement to the FED. This alternative is based upon the BAU concept. In describing the No Project/BAU alternative, on page 21 the 2011 Final Supplement to the FED states:

“It is important to note that the two main drivers of the No Project scenario involve population growth and current laws and regulations. Population growth in California will result in more vehicle miles travelled, more goods movement, greater water and energy demands, and more consumer products.”

In summary, the Scoping Plan and associated documents do not assume a constant population, and the assumed population growth is not related to or derived from General Plans and other local land use plans. Instead, the BAU concept in the Scoping Plan and the 2011 Final Supplement to the FED is based on assumptions regarding state-wide population growth and growth in each of the 7 GHG emission sectors identified in the Scoping Plan, while assuming no changes in existing

regulations or new regulations that would reduce GHG emissions. Any references in the Scoping Plan and 2011 Final Supplement to the FED to conditions that existed in 2010 relate specifically to the regulatory conditions related to GHG emissions that existed in 2010.

The GHG and climate change impact analysis in the RDSEIR meets the requirements of CEQA, the CEQA Guidelines, and recent case law, which direct that the proper way to analyze GHG impacts is first to compare the proposed project to the existing conditions (or baseline); and second to compare the proposed project (which may include measures to reduce GHG emissions) with a BAU version of the project (which typically would not include the same GHG reduction measures). The first part of this analysis is provided by the GHG emissions estimate for the proposed project summarized in Table 8.3. In its current, undeveloped condition, there are no GHG emissions associated with the site. For the second part of this analysis, the emissions summarized in Table 8.3 are compared to the BAU emissions summarized in Table 8.2 to determine if the project achieves the identified threshold. As stated on page 8-7 of the RDSEIR, a project that achieves a 21% reduction in GHG emissions compared to the BAU scenario would have a less than significant impact. As discussed on page 8-7, this threshold is based on a BAU scenario that does not account for either the vehicle emission reductions anticipated under the Pavley I vehicle fuel efficiency requirements or the Renewable Portfolio Standard (of “RPS,” which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020). This is consistent with the description of the BAU scenario provided on page 11 of the 2008 Scoping Plan.

In conclusion, the GHG analysis in the RDSEIR does not need to consider a BAU scenario that reflects the land use conditions present in 2010 because the methodology in the Scoping Plan and the 2011 Final Supplement to the FED do not rely on an assumption that land use conditions would remain constant. Instead the BAU scenario in the RDSEIR appropriately reflects the type of building features and design measures that were typical in 2010, consistent with the BAU scenario described in the Scoping Plan and the 2011 Final Supplement to the FED.

- 6-5** The comment states that the BAU analysis approach recommended in this comment letter is consistent with other air districts, such as the Bay Area Air Quality Management District (BAAQMD). The footnote to this comment indicates that the comment is referencing page 4-8 of the BAAQMD May 2012 CEQA Guidelines.

The referenced page of the BAAQMD May 2012 CEQA Guidelines does not discuss methodology for a BAU analysis in a project-level EIR. Instead, that page discusses methodology for preparing a GHG inventory as part of a Climate Action Plan. In that context, the BAAQMD recommends that “the business-as-usual forecast should project emissions from the baseline year using growth factors specific to each of the different economic sectors.” The BAAQMD does not recommend relying on an existing general plan to prepare the BAU assumptions.

The BAAQMD recommendations for evaluating a project's GHG emissions in the context of an EIR or MND are presented on pages 4-5 through 4-7 of the May 2012 CEQA Guidelines. These recommendations include using the BAAQMD GHG Model to generate an estimate of the project's GHG emissions and comparing those emissions to the threshold established by the lead agency. This section of the May 2012 CEQA Guidelines does not discuss use of a BAU approach for evaluating a project's GHG emissions. Nor did prior versions of the BAAQMD CEQA Guidelines (such as those adopted in 2010, which have been withdrawn pending the outcome of ongoing litigation) discuss the use of a BAU approach for evaluating a project's GHG emissions.

- 6-6** The comment states that the Placer County APCD's recommended approach to modeling the BAU scenario is consistent with recent court cases, including *Citizens for Responsible Equitable Environmental Development (CREED) v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, and *Friends of the Northern San Jacinto Valley et al. v. County of Riverside*, Riverside County Superior Court Case No. RIC10007572 (2012). The comment describes the *CREED* case as requiring that the BAU scenario be credible based on what existed in the baseline year, and as stating that the BAU scenario should not be a hypothetical scenario of the proposed project. The comment describes the relevant finding in the *Friends of the Northern San Jacinto Valley* case as stating that the BAU scenario may not reflect an unrealistic "worst case" scenario that ignores local planning and zoning laws. The commenter also states that District's recommended approach is consistent with the approach the City used for the recently approved WestPark Phase 4 Amendment, which, like the proposed Fiddymment Ranch project, is within the WRSP. The comment concludes by reiterating the recommendation to base the BAU analysis on the existing land use entitlements for the project site.

The commenter's description of the *CREED* case is incorrect. In *CREED*, the court did not discuss the BAU scenario in relation to whether it was credible or hypothetical. The proposed project in that case would demolish an existing shopping center and construct a new retail store, "resulting in a net size increase of 9,844 square feet of commercial development." 197 Cal. App. 4th at 330. The GHG analysis for the proposed project in that case used a threshold of significance that required the project to reduce GHG emissions when compared to the projected emissions from the proposed project under a BAU scenario (in other words, the emissions from the proposed project – the new, larger store – in a future year, but assuming no changes in the regulatory conditions specific to GHG emissions from 2010). In upholding the "reduction from BAU" threshold of significance used in that analysis, the court found that the analysis of GHG emissions properly compared the projected emissions of the proposed new store *without* implementation of energy saving measures (the BAU scenario) to the projected emissions of the proposed new store *with* implementation of energy saving measures. The court summarized the analysis as follows:

"The record supports the 29 percent reduction. The Air Quality Assessment listed the operational emissions for 'business as usual' for the existing Target

store and the proposed store at 8,280 metric tons per year and 10,337 metric tons per year, respectively. Thus, under ‘business as usual’ the proposed Target store would increase greenhouse gas emissions by 2,057 metric tons. However, through the implementation of energy saving measures, the operational greenhouse gas emissions for the proposed store are reduced to 7,381 metric tons per year, or 2,956 metric tons less than ‘business as usual.’ This amounts to a 29 percent reduction from business as usual.” 197 Cal.App.4th at 337

In other words, the court found that the BAU emissions were those that were projected to be generated by the proposed store when no energy saving measures were implemented. It did not find that the BAU emissions must be equal to the projected emissions from the existing store, and the *CREED* decision does not require that BAU emissions be the same as either existing land uses, or, by extension, currently planned but unbuilt land uses.

Applied to the proposed Fiddymment Ranch SPA 3 project, the *CREED* decision supports the methodology used in this RDSEIR of calculating BAU emissions as those projected to be generated by the proposed project when no GHG reduction measures (other than measures that would have been required in the year from which BAU is established) are incorporated.

The Statement of Decision in the *Friends of the Northern San Jacinto Valley*, cited by the commenter, does not directly relate to the approach used in this RDSEIR to model the BAU scenario. In *Friends of the Northern San Jacinto Valley*, the project involved proposed development of over 11,000 dwelling units and 500,000 square feet of retail, office and commercial uses, schools and other public facilities, while retaining almost 1,000 acres of the 2,800-acre site in open space/conservation. This court described the errors in the GHG analysis in this case as follows:

“... the hypothetical project proposed for the EIR does not accurately reflect business as usual because it uses an unrealistic scenario which ignores local planning and zoning laws, strips all vegetation from the project, and contemplates development on mountainous portions of the project site. In addition, the hypothetical scenario fails to account for the fact that project approval under CEQA contemplates a process whereby the adverse environmental effects of a project of this nature are identified and analyzed; alternatives are considered; and potential impacts are eliminated or mitigated. The hypothetical project, which ignores not only local planning and zoning laws as well as potential adverse impacts, is not one that could ever be expected to actually occur in the County let alone on the project site. It does not appear the EIR used a ‘business as usual’ approach but instead adopted a ‘worst-case’ scenario as it began its evaluation of the GHG emissions.” Proposed Statement of Decision (April 11, 2012), page 3, adopted by Minute Order on May 16, 2012.

Unlike the BAU scenario used in this RDSEIR, the BAU scenario used in *Friends of the Northern San Jacinto Valley* was a hypothetical “worst case” that artificially overstated the effects of the proposed project, and did not reflect a reasonable attempt at minimizing a wide range of environmental effects. It violated planning and zoning laws by assuming development on portions of the property that would normally be restricted from development (such as assuming development on steeply sloped portions of the site and assuming development that would result in significant impacts to biological resources). In other words, it was a project that would not have been likely to have been approved even if no consideration were given to GHG emissions.

In contrast, the BAU scenario used in this RDSEIR is not a worst case scenario. It consists of the proposed project without the implementation of GHG reduction measures that are not otherwise required, consistent with the findings in both *CREED* and *Friends of the Northern San Jacinto Valley*. Neither the proposed project nor the BAU scenario in this RDSEIR change the footprint of development as currently planned, and impacts to other environmental resources have been appropriately evaluated and reduced where feasible. The BAU scenario reflects a project that could reasonably be expected to be approved, because the proposed densities and mix of land uses are similar to that which has been approved in other portions of the City, including other portions of the WRSP.

The BAU scenario used in this RDSEIR is appropriate because it reflects a project that could reasonably be approved in the absence of consideration of GHG emissions. The analysis in the RDSEIR and as edited in this Final Subsequent EIR correctly evaluates the ability of the proposed project to reduce GHG emissions compared to the BAU scenario.

- 6-7** The comment states that the GHG emissions shown in Tables 8.2 and 8.3 are not consistent with the CalEEMod outputs. The comment also states that the EIR does not explain how the maximum annual construction emissions were calculated.

As discussed in Response to Comment 6-11 below, the GHG emissions estimates for both the proposed project and the BAU scenario have been updated. The GHG emissions in Tables 8.2 and 8.3, and the discussion of Impact 8.1, have been revised to reflect the updated CalEEMod outputs. The revised impact analysis and tables are presented in Chapter 3 of this Final Subsequent EIR, and the updated CalEEMod reports are provided in Appendix F. The updated emissions estimates do not alter the conclusions of the impact analysis.

A description of how the maximum annual construction emissions were calculated is provided on page 8-17 of the RDSEIR. It is noted that the first paragraph of that discussion contains a typographical error, referring to a 103-year construction schedule in the fourth sentence. As shown in Chapter 3 to this Final Subsequent EIR, this sentence has been revised to refer to a 12-year construction schedule consistent with two other statements in the same paragraph.

- 6-8** The comment identifies errors in RDSEIR Chapter 11 Cumulative Impacts. Specifically, the comment requests clarification on the significance determination for Impact 11.10, requests that an analysis of PM10 emissions be added to that impact, recommends that the EIR reference the specific Development Agreement requirements for payment of air quality mitigation fees, and states that Mitigation Measure 11.10a is not sufficient to fully reduce the project's operational emissions to a less than significant level.

The identified errors were corrected and the requested information was provided in P2R Chapter 11 Cumulative Impacts, pages 11R-20 and 11R-21. The edits clarify that the project would result in a significant and unavoidable impact related to cumulative air quality conditions associated with both construction and operational emissions.

- 6-9** The comment requests that the Construction Mitigation Report be included in the EIR appendices.

All construction mitigation measures assumed in the CalEEMod modeling are reflected in the mitigation measures identified in the EIR. The Construction Mitigation Report (an output from the CalEEMod program) is provided in Appendix F to this Final Subsequent EIR. The Construction Mitigation Report does not contain significant new information because it does not involve new or substantially more severe significant impacts and because it is incorporated into the mitigation measures.

- 6-10** The comment states that Mitigation Measure 7.1b requires the use of oxidation catalysts on all construction equipment and that this measure may not be feasible or enforceable. The comment recommends that the CalEEMod modeling assume partial use of oxidation catalysts and incorporate components of Mitigation Measure 7.1a to reduce NOx and PM emissions.

Mitigation Measure 7.1b does not require the use of oxidation catalysts on all construction equipment. Additional discussion of this measure was added to P2R Chapter 7 Air Quality to clarify that the oxidation catalyst was applied in the CalEEMod modeling as a proxy for this mitigation measure (page 7R-23). The measure only requires that emissions from the construction equipment fleet be reduced compared to the statewide fleet average. (Specifically, it requires that ROG emissions be reduced by 20% and PM emissions be reduced by 45%). It does not specify the mechanism by which these reductions must be achieved. As shown on page 7R-30 of the P2R, text added to the measure clarifies how compliance with the measure would be monitored and enforced; additional details regarding mitigation measure implementation and monitoring are provided in the Mitigation Monitoring and Reporting Program provided in Chapter 4 of this Final SEIR. The CalEEMod modeling already accounts for the emissions reductions associated with Mitigation Measure 7.1a.

- 6-11** The comment states that the CalEEMod land use settings for the BAU scenario and for the proposed project (the 2020 projection) should be consistent. Specifically, the comment states that the settings in the Land Use Mitigation Tab for each scenario

should include all planning area characteristics that would apply without any discretion or entitlement action. In other words, the comment recommends that provisions such as traffic calming enhancements that were required as part of the original WRSP approval should be reflected in the BAU modeling assumptions.

The CalEEMod modeling for the both the proposed project and the BAU scenario has been revised to meet this recommendation. The resulting GHG emissions presented in Tables 8.2 and 8.3 have been updated, as shown in Chapter 3 of this Final Subsequent EIR. The updated modeling results and mitigation reports are provided in Appendix F to the Final SEIR. The mitigation measures from the Land Use Mitigation Tab applied to the BAU scenario include:

- “Increase diversity” (the BAU scenario assumes development of the same land uses as the proposed project, which would provide a variety of housing products and land uses)
- “Integrate below market rate housing” (in accordance with the WRSP, development within the project area is required to construct 10% of the units on-site as affordable housing); and
- “Improve destination accessibility” (the project would be located within 8 miles of a downtown or employment center)

The following additional mitigation measure from the Land Use Mitigation Tab was applied to the proposed project scenario:

- “Improve pedestrian network” (the project would construct paseos and sidewalks that provide for non-motorized mobility throughout the project site and would connect to offsite pedestrian and bicycle facilities; the proposed project design expands the pedestrian network compared to the requirements of the WRSP)

In addition both scenarios assume the use of efficient indoor water fixtures because the City of Roseville would have required implementation of a Water Conservation Plan for a project approved in 2010 (thus this is part of the BAU scenario as well as part of the proposed project). In addition to what was required for a project approved in 2010, the proposed project modeling also assumes residences within the project site will have energy- and water-efficient appliances and will exceed the 2014 Title 24 energy efficiency requirements by 15%. These features would not have been required in 2010 and, therefore, are not included in the BAU scenario. It is noted that traffic calming measures are specifically mentioned in the comment but were not used in the modeling of either the proposed project or the BAU.

As shown in the revised Tables 8.2 and 8.3 presented in Chapter 3 of this Final Subsequent EIR, the BAU GHG emissions are estimated to be 47,674 metric tons of carbon dioxide equivalents (MTCO₂e) annually and the proposed project GHG emissions are estimated to be 35,392 MTCO₂e annually. Therefore the proposed

project would reduce emissions by 25.76% compared to BAU, resulting in a less than significant impact.

It is also noted that implementation of Mitigation Measure 7.2b would result in a reduction of 45 tons ROG and NO_x due to payment of off-site mitigation fees. This would also provide for an additional reduction in GHG emissions because 13.18 tons of CO₂ are reduced for each ton of ROG and NO_x reduced (Roseville 2013, p.4.4-18, citing Christofk, pers. comm. 2011). The payment of the off-site mitigation fees for this project would provide for a reduction of 595 tons, or 540 metric tons of CO₂e.

- 6-12** The comment recommends that detailed calculations showing the emission reductions associated with Mitigation Measures 8.1a and 8.1b be included in the EIR appendices.

The emissions reductions from these measures are reflected in the CalEEMod outputs to the extent feasible. As explained on pages 8-18 and 8-19 of the RDSEIR, Mitigation Measure 8.1a requires that residential units constructed within the project site achieve specific BuildItGreen scores by incorporating measures selected from a menu of energy and water efficiency measures. For some of the optional measures, there is a lack of data on which to base emission reduction assumptions. Further, by not modeling all of the specific measures that would be needed to achieve the required BuildItGreen scores, some flexibility is preserved for future homebuilders to select their preferred efficiency measures to achieve the stipulated BuildItGreen scores.

Mitigation Measure 8.1b requires implementation of a water conservation plan. As shown on page 9A-3 of the RDSEIR, the plan would reduce water usage by less than 10%. Also, as discussed above, a water conservation plan would have been required for a project approved in 2010, and thus would be part of the BAU scenario. Both the BAU and proposed project modeling reflect use of water-efficient indoor fixtures (such as toilets, faucets, and showerheads) to account for the effect of Mitigation Measure 8.1b.

- 6-13** The comment states that the Construction Mitigation Report included in the EIR appendices is not applicable to the proposed project and request that the correct report be provided.

As discussed in Response to Comment 6-9, the Construction Mitigation Report (an output from the CalEEMod program) is provided in Appendix F. The report does not provide significant new information.

Department of Transportation
Michael J. Penrose, Director



Divisions
Administration
Maintenance & Operations
Engineering & Planning

County of Sacramento

December 19, 2013

Ron Miller
Development Services—Planning Division
311 Vernon Street
Roseville, CA 95678

SUBJECT: COMMENTS ON THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (DSEIR) FOR THE WEST ROSEVILLE SPECIFIC PLAN (WSRP) FIDDYMENT RANCH SPECIFIC PLAN AMENDMENT (SPA) PHASE 3 PROJECT

Dear Mr. Miller,

The Sacramento County Department of Transportation has received the Notice of Availability for the above referenced DSEIR. We appreciate for the opportunity to review this document.

As mentioned in the executive summary (Impact 5.8), the City of Roseville shall enter into a cooperative funding agreement with the County of Sacramento to collect mitigation measure fair share from the project proponent(s) for construction of third northbound and southbound through lanes on Watt Avenue south of Elverta Road. Please contact us to initiate this funding agreement between both jurisdictions.

If you have any questions please call me at (916) 875-2844.

Sincerely,

Kamal Atwal, P.E.
Associate Transportation Engineer
Department of Transportation

KA/mp

Cc: Matt Darrow, DOT
Dean Blank, DOT
Dan Shoeman, DOT
Kate Rose, Department of Community Development

7-1

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Response to Comment Letter 7

**County of Sacramento Department of Transportation
Kamal Atwal, P.E., Associate Transportation Engineer
December 19, 2013**

7-1 The comment confirms the analysis and mitigation measure in the RDSEIR.

The City of Roseville appreciates this confirmation of the RDSEIR analysis and mitigation measure from Sacramento County.

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Comment Letter 8

From: [Katherine Waugh](#)
To: [Katherine Waugh](#)
Subject: FW: SPA 3
Date: Monday, February 17, 2014 2:06:20 PM

From: John [mailto:john_petrovich@hotmail.com]
Sent: Friday, December 13, 2013 8:58 PM
To: Miller, Ronald
Subject: SPA 3

I am against SPA 3. I would appreciate it if Roseville would not adopt this amendment.

| 8-1

Thank you,
John Petrovich

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Response to Comment Letter 8

John Petrovich
December 13, 2013

8-1 The comment identifies general opposition to the project and expresses that the City should not adopt the proposed project.

General opposition to a project is not required to be addressed under CEQA, and this comment does not address the content of the RDSEIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

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From: [Miller, Ronald](#)
To: [Katherine Waugh](#)
Subject: FW: SPA 3
Date: Monday, December 16, 2013 8:53:05 AM

Ron Miller
Associate Planner
Development Services – Planning Division
City of Roseville
311 Vernon Street
Roseville, CA 95678
(916) 774-5276
(916) 774-5129 fax
www.roseville.ca.us



From: Margaret Petrovich [mailto:m_petrovich@hotmail.com]
Sent: Friday, December 13, 2013 9:08 PM
To: Miller, Ronald
Subject: SPA 3

I am against the SPA 3 that would add over 1600 residential units to West Park.

Margaret Petrovich

9-1

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Response to Comment Letter 9

Margaret Petrovich

December 13, 2013

- 9-1** The comment identifies general opposition to the project and states that the project would result in the addition of over 1,600 residential units to WestPark.

General opposition to a project is not required to be addressed under CEQA, and this comment does not address the content of the RDSEIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

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Katherine Waugh

From: Katherine Waugh
Sent: Friday, February 07, 2014 11:21 AM
To: Katherine Waugh
Subject: FW: We are Strongly Opposed to SPA 3

From: Paul Thomas [<mailto:pptomas1@yahoo.com>]
Sent: Friday, December 13, 2013 2:11 PM
To: Miller, Ronald
Subject: We are Strongly Opposed to SPA 3

My wife and I are opposed to SPA 3 for a number of reasons first and foremost is the probably of increased taxes. We are on fixed-income and the increase in taxes that most assuredly will occur with this increased density plan will adversely affect our quality of life.

As an example, increasing 1661 additional units beyond the original plan will certainly create significant increases in the neighborhood traffic pattern, and adversely effect our West Roseville neighborhood property values. When I bought my home here in West Park I was told and understood that the West Park Plan was in concrete and would not change. Its shameful that the city of Roseville strong-arms and sticks its senior citizens with a Mello-Roos Tax because our builder rolled over during the planning stages, now you want to change the rules with SPA 3 to increase those taxes even higher. We strongly urge the Roseville Planning Commission to consider what SPA 3 will do to retired community in West Park. Higher taxes, property value decreases, increased traffic, impact on schools and infrastructure are some of the things that come to mind with SPA 3 Amendment.

We purchased our home and signed our assessment agreements with a set expectations and it now appears that the Roseville Planning Commission wants to change those expectations with SPA 3 which is patently unfair to the residents of West Roseville. We strongly oppose SPA 3 for the stated reasons.

Respectfully submitted,

Paul and Patricia Thomas
2136 Penstone Loop
Roseville, CA 95747

10-1

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Response to Comment Letter 10

Paul and Patricia Thomas

December 13, 2013

10-1 The comment states that the proposed project would result in increased taxes and states that increasing taxes would have an adverse effect on the commenters' quality of life. Additionally, the comment states that an additional 1,661 units would create significant increases in traffic and would have an adverse effect on property value. The commenters state their opposition to amending the WRSP and concern for how the proposed project could affect retired people already living in the WestPark community. The comment identifies general concerns regarding impacts related to higher taxes, decreasing property values, increasing traffic levels, schools, and infrastructure.

The effect of the proposed project on tax rates and property values would not result in physical environmental effects and is not required to be evaluated in the EIR. In addition, the project would not affect the taxes paid by existing landowners within the WRSP area. The taxes are established based on the Large Lots created by the WRSP Large Lot Tentative Map. Each of these Large Lots is assigned a maximum total tax amount, from which the per-unit tax amount is calculated. The Maximum Tax on each Lot on a Final Map cannot be increased unless approved by a vote of all property owners within that Final Lot Map. All development under the proposed project would occur on Large Lots that do not currently support any development. Therefore any tax amounts established for Large Lots within the project site would not affect any existing residential units or lots, and the project would only affect Maximum Taxes for undeveloped lots directly affected by the proposed project.

Impacts of the proposed project on traffic are evaluated in Chapter 5 of the RDSEIR, impacts of the proposed project on schools are evaluated in Chapter 10 of the RDSEIR, and impacts related to infrastructure are evaluated in the RDSEIR as follows: Chapter 9 addresses utilities, Chapter 9A addresses water, Chapter 9B addresses wastewater, Chapter 9C addresses recycled water, and Chapter 10 addresses public services such as libraries, schools, police protection, and fire protection. No specific comments were provided on the content of the RDSEIR.

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V-A



WestPark - Fiddymment Farm Neighborhood Association (WFFNA)
A member of the Roseville Coalition of Neighborhood Associations

Date: November 13, 2013
To: Planning Commission Chair Gordon Hinkle and members of the Planning Commission
Cc: Ron Miller, City of Roseville Associate Planner

Subject: Proposed West Roseville Specific Plan Amendment (WRSP -SPA-3) for the Fiddymment Farm area

Dear Chair Hinkle and Planning Commission members,

The WestPark – Fiddymment Farm Neighborhood Association (WFFNA) has submitted numerous correspondence of opposition to the proposed SPA-3 plan, both the original proposal of over 1,900 units, and the more recent proposal of 1,661 units. Once again, we ask your consideration to not approve SPA-3 as currently proposed.

The notification dated March 7, 2013, from Ron Miller, City of Roseville Associate Planner, discusses reactivating SPA-3 with a proposed lower figure. The notification contains numerous discrepancies and omissions in the figures represented for SPA-3. It fails to take into consideration prior amendment requests for the WestPark area of the WRSP, and the quantities noted on numerous figures do not total up correctly. More accurate figures for both areas are reflected on the two documents attached—Table 1: WestPark – Cumulative Totals and Table 2: Fiddymment Farm – Cumulative Totals. Both of these documents indicate cumulative figures supplied by the developers for pending amendments and, with minor changes made during previous construction, should be fairly representative of the state of the WRSP to date.

As the figures in attached Table A represents, including the current pending amendment to the Phase 4 area (which WFFNA does not object to), the projected numbers of units for the WestPark area would increase from the original 4,260 units to approximately 4,610 units. However, as the attached Table B represents, the Fiddymment Farm totals, including the current proposed SPA-3, would jump significantly from the original 4,170 units to 5,868 units.

The West Roseville Specific Plan, adopted in 2004, Sec. 4.3 of the Land Use Plan specifies:

“The West Roseville Specific Plan has assigned residential densities based on a plan level assessment of the constraints and opportunities of each large-lot Specific Plan parcel and anticipated long-term demand for various housing types. ...It is anticipated that this process may result in the desire or need to adjust (reduce or increase) the number of units assigned to some large-lot residential parcels.



"It is the intent of the WRSP to permit flexibility in adjusting the number of residential units allocated to any residential large lot parcel in response to market demand, subdivision and/or design review considerations, including but not limited to transfers which do not result in additional impacts to oak trees or other natural resources. To further this intent, units may be transferred between large lot residential parcels provided:

"b. The cumulative increase or decrease in units resulting from the minor density adjustment does not change by more than twenty-percent (20%) the number of pretransfer units allocated to either the transfer or receiving parcel as established at the time of original approval of the Specific Plan."

It appears the obvious intent of the West Roseville Specific Plan is to maintain the development within a reasonable limit of the original approved allotments—20% as named. As the following figures indicate, SPA-3 is far beyond the intent of the West Roseville Specific Plan.

Area	WRSP Original Units	With Pending SPAS	Cumulative Increase	% Increase-Area
WestPark	4,260	4,610	350 units	8%
Fiddymnt Farm	4,170	5,868	1,698 units	40.7%

Total WRSP Original Approved	20% Cumulative Limit of original WRSP	Cumulative Increase of Proposed SPAs	Total % Proposed Increase to WRSP
8,430 Units	1,686 Units	2,048 Units	24.3%

As stated in the WRSP introduction, "The West Roseville Specific Plan is the primary land use, policy and regulatory document used to guide development of the project area. ...All subsequent development projects and related activities in the WRSP area are required to be consistent with this Specific Plan." Residents of the WestPark and Fiddymnt Farm developments purchased their homes under the guidelines of the WRSP and signed agreements for the Mello Roos assessments attached thereto. Those assessments are supposedly apportioned with the figures consistent with the original WRSP. Even though there have been minor increases to the amount of units so far, there have been no proposed equivalent adjustments to reduce the matching assessments proportionally yet.

The homeowners of the WRSP area ask that the City Council reject the proposed Specific Plan Amendment pending for the Fiddymnt Farm area (SPA-3) as currently proposed. We would ask that any further amendment be limited within the original scope of the WRSP and held within the 20% cumulative total originally authorized in the Plan. Although the Plan does not specify that the 20% be maintained by any subdivision, it does specify, "The intent is to promote the systematic and orderly development of the Plan Area." There is a vast discrepancy between the **40.7%** (1,661 units) increase SPA-3 proposes and what 20% of the total Fiddymnt Farm increase would be (834 units), some of which have already been used in prior amendments. Such a huge density increase is not consistent with maintaining a consistent balance within the Fiddymnt Farm area.

11-2
Cont.

11-3

11-4

We have no opposition to the minor changes proposed SPA for Phase 4 of the WestPark area, and would include those figures in the overall cumulative limits of the WRSP. Thus, we would ask that any further amendment requests for the WRSP be limited as follows:

Total WRSP Original Approved	20% Cumulative Limit of WRSP	Current Projected WestPark totals	Current Fiddymment Farm	Cumulative balance not to exceed
8,430 Units	10,116 Units	4,610 Units	4,207	1,299 Units

SPA-3 was first submitted back in 2010 requesting the addition of 1,905 units, and was resubmitted in 2012 with a reduction to 1,661 units. This figure is still too high. If even the full cumulative balance of 1,299 units were approved for SPA-3, that increase would represent a 31% increase to the Fiddymment Farm area, and more particularly that would squeeze the density into the last remaining phases, far exceeding the original density of that region. It also incorporates potential allotments from the WestPark area not already used and squeezes them into the Fiddymment Farm area.

The proposed cumulative balance allowed for Fiddymment Farm would keep the SPA-3 area closer to 834 units represented by a 20% increase as approved in the WRSP. However, we are asking only that the SPA-3 area be kept to the density limits and number of units of the original WRSP plan for the area (1,460 units) plus 20% (292 units)—that being a total of **1,752** units, not the proposed SPA-3 total of 3,121 (1,661 additional units).

As for the addition of two more HDR facilities into the Fiddymment Farm area, we would point out that the WRSP already has a large quantity of HDR parcels in the current plan: 3 parcels now planned in WestPark; and 7 parcels in the current Fiddymment Farm area plan for a total of **10 HDR** parcels (1,983 units). We can understand that the City of Roseville must meet certain governmental requirements to meet multi-dwelling and affordable housing units. However, those regulations do not dictate that all the requirements be met in the West Roseville area; that is a preference the City of Roseville has taken to simplify its planning processes. Other developments already approved in the West Roseville area are proposed at sufficient densities to accommodate any governmental requirements:

Project (initial proposals)	Total Acres	LDR Units	MDR Units	HDR Units	Total Units
Sierra Vista (approved)	2064	2,531	2,214	1,650 (8 parcels)	6,650
Westbrook (approved)	397.4	705	635	689 (4 parcels)	2,029
Creekview (approved)	501.3	836	655	520 (3 parcels)	2,011
Amoruso Ranch (pending)		1,132	779	760 (3 parcels)	2,671
Placer Ranch (not annexed yet)	2,200				5,000 + campus for 25,000 full-time students

11-4
Cont.

11-5

Members of the WFFNA have met several times with representatives of the proposed SPA-3 amendment. While we approve of some of the suggested infrastructure changes of the general layout, we continue to express our opposition to the extreme increased density as currently proposed.

The residents of the WestPark and Fiddymont Farm neighborhoods respectfully submit this request for the City Council and Planning Department staff to consider the original intent of the WRSP which established the expectations under which we purchased our homes and signed our assessment agreements. To approve SPA-3 as submitted would represent a gross breach of faith with our residents.

Respectfully submitted,
WestPark – Fiddymont Farm Neighborhood Association (WFFNA) Board Members:

Loren Cook, President
Robert Gorman, Vice President
Sue Hallahan-Cook, Secretary
Joe Van Zant, Treasurer
Jason Jasmine, Member at Large
Lita Freeman, Member at Large

11-6

TABLE 1: WESTPARK - CUMULATIVE TOTALS									
Parcel	Land Use	2006 Units	2009 Changes	# Units	As of 10/2011	# Units	2012	2013 Changes	# Units
W-1 -Club	LDR	404							404
W-2-Club	LDR	300							300
W-3	LDR	198							198
W-4	LDR	147							147
W-5	LDR	88							88
W-6	LDR	77							77
W-7	LDR	111							111
W-8	LDR	168							168
W-9	LDR	95	see 17C & 18C						N/A
W-10	LDR	245							245
W-11	LDR	130							130
W-12	LDR	78							78
W-13	LDR	60	W-13C		W-13	309			309
			W-13B		see W-13				N/A
W-14	LDR	115	W-13A		see W-13				N/A
W-15	LDR	80	W-15A		W-15	224			224
			W-15B		see W-15				N/A
W-16	MDR	160	W-16 HDR	208		250 @20.5			250
W-17	LDR	210	W-17A			132	W-17A		66
			W-17 B			130	W-17B		56
			W-17C			113	W-17C		69
							W-17D		53
							W-17E		41
W-18	LDR	268	W-18A			141	W-18A		86
			W-18B			152	W-18B		57
			W-18C			112	W-18C		102
							W-18D		92
							W-18E		52
							W-18F		19
W-19	MDR	165	W-19 HDR			252 @ 17.7	W-19A LDR		109
							W-19B LDR		85
W-20	LDR	0							0
W-21?	was in W-18B						W-21? HDR		170 @ 21.5
W-28	HDR	175 @ 19.4	see W-18						N/A
W-29	HDR-SR	150 @ 18.8	see 15B ?						N/A
Village Center					Redrawn				
W-21	MDR	138							138
W-22	MDR	138					subdivide		138
W-24	MDR	115				111			111
W-25	HDR	240 @ 19.4		232		232	subdivide		232
W-26	HDR	165 @ 16.5							165
W-32	CC-VC	20							20
W-33	CC-VC	20							20
Totals		4,260				VC= 824	Add 107 LDR?		4,610

11-1
Cont.

TABLE 2: FIDDYMENT FARM - CUMULATIVE TOTALS

Parcel	Land Use	2006 Units	2010 changes	SPA-3	Land Use	# Units
Phase 1						
F-1A	LDR	93				
F-1B	LDR	83				
F-2	LDR	127				
F-3	LDR	135				
F-4	LDR	77				
F-5	LDR	157				
Total:		673				673
Phase 2 & 3						
F-6	LDR	187	140	F-6A	LDR	155
				F-6B	HDR	195
				F-6C	MDR	300
				F-6D	CC	
F-7	LDR	111	87			115
F-8	LDR	91	74	F-8A	HDR	277
				F-8B	MDR	127
				F-8C	LDR	83
				F-8D	LDR	35
F-9	LDR	307	378	F-9A	LDR	108
				F-9B	LDR	96
				F-9C	LDR	107
				F-9D	LDR	35
F-10	LDR	227	183	F-10A	LDR	122
				F-10B	LDR	118
				F-10C	LDR	90
F-11	LDR	99	84	F-11A	LDR	172
				F-11B	MDR	182
F-12	LDR	167	117			113
F-13	LDR	154	121	F-13A	LDR	90
				F-13B	LDR	159
F-14	LDR	422	422			422
F-15A	LDR	79	76			76
F-15B&C	MDR	206	F-15B = 45 F-15C = 46			45 46
F-16	MDR	208	LDLR = 110			110
F-17	MDR	131	131			131
F-19	LDR	104	104	F-19A	LDR	135
				F-19B	LDR	135
F-20	HDR	120 @ 17.4	156 @ 22.5			156
F-21	HDR	219 @ 15.1	289 @ 20.0			289
F-22	HDR	126 @ 13.0	207 @ 20.0			207
F-23	HDR	160 @ 13.2	234 @ 20.0			234
F-24	HDR	200 @ 15.7	253 @ 20.0			253
F-25	HDR	90 @ 15.5	137 @ 25.0			137
F-26	HDR	90 @ 15.3	140 @ 25.0			140
Total Units		4170	4207			5868

11-1
Cont.

Response to Comment Letter 11

WestPark Fiddymment Farms Neighborhood Association

Loren Cook, President

November 13, 2013

- 11-1** The comment states that the WestPark-Fiddymment Farms Neighborhood Association opposes the proposed Fiddymment Ranch SPA 3 project. The comment states that notification from the City dated March 7, 2013 contains errors regarding the proposed project and prior amendments to the WRSP.

General opposition to a project is not required to be addressed under CEQA. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project. The unit counts shown in Table 2 presented at the end of this comment letter are consistent with the unit counts shown in Tables 3.2 and 4.1 in the RDSEIR.

- 11-2** The comment compares the residential unit increases under the proposed project and a prior SPA project relative to the original WRSP approvals. The comment expresses no opposition to the prior project, which resulted in a total increase over the original WRSP approvals of 350 residential units for the WestPark portion of the plan area. In contrast, the comment states that the proposed project would result in a total (or cumulative) increase of 1,698 units more than the original 4,170 residential units included in the WRSP for Fiddymment Ranch. The comment also references section 4.3 of the WRSP and provides the commenter's interpretation that the plan language limits future plan amendments such that residential unit allocations may not increase by more than 20% over the original WRSP approvals.

For clarification, it is noted that the proposed project would provide for an increase of 1,661 residential units. At the time of approval, the WRSP originally allocated 4,170 units to the Fiddymment Ranch area. Prior amendments to the WRSP increased that to 4,207. The comment is correct that if the proposed project is approved, the total increase in residential units compared to the original WRSP approvals would be 1,698 units.

The RDSEIR addresses the project's consistency with the WRSP in Chapter 4 Land Use. The WRSP language cited in the comment is specific to approvals of minor density adjustments within the plan area. The language cited does not apply to SPAs, such as the proposed project. SPAs are subject to environmental review and a public hearing process and require an amendment to the City's General Plan. A minor density adjustment, by contrast, does not require amendments to the Specific Plan or General Plan, and can be approved subject to an Administrative Permit issued by the Planning Manager.

- 11-3** The comment references language in the WRSP stating that future projects within the plan area must be consistent with the Specific Plan. The comment also states that

Mello Roos assessments have not been adjusted to reflect prior adjustments and amendments to the Specific Plan.

The comment does not address the adequacy of the analysis in the RDSEIR. Please see Response to Comment 10-1, which explains why the proposed project would not alter tax rates on existing developed parcels, and Response to Comment 11-2 regarding consistency with the WRSP.

- 11-4** The comment reiterates opposition to the proposed project, states that the proposed increase in density is not consistent with the WRSP, and suggests that future amendments to the WRSP be limited to a cumulative increase of 1,299 dwelling units.

The comment does not address the adequacy of the analysis in the RDSEIR. As discussed in response to Comment 11-2, the proposed project would require General Plan and Specific Plan amendments. The RDSEIR evaluates potential land use incompatibility effects that could result from the proposed project, and concludes that no significant adverse impacts would occur.

- 11-5** The comment expresses opposition to the addition of two new high density residential (HDR) parcels to the project area, stating that there is already a disproportionate number of HDR parcels in the WRSP.

The analysis in the RDSEIR of potential land use incompatibility effects that could result from the proposed project includes consideration of the proposed HDR parcels. The RDSEIR concludes that no significant adverse impacts would occur as a result of designating two new HDR parcels within the project site.

- 11-6** The comment reiterates opposition to the proposed project and to substantial amendments to the WRSP.

General opposition to a project is not required to be addressed under CEQA, and this comment does not address the content of the RDSEIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., GOVERNOR

CENTRAL VALLEY FLOOD PROTECTION BOARD

3310 El Camino Ave., Rm. 151
SACRAMENTO, CA 95821
(916) 574-0609 FAX: (916) 574-0682
PERMITS: (916) 574-2380 FAX: (916) 574-0682



December 7, 2011

Mr. Ron Miller
City of Roseville
311 Vernon Street
Roseville, California 95630

Subject: Fiddymment Ranch Specific Plan Amendment 3 SCH Number: 2002082057
Supplemental/Subsequent EIR

Dear Mr. Miller:

Staff for the Central Valley Flood Protection Board has reviewed the subject document and provides the following comments:

The proposed project is located within the jurisdiction of the Central Valley Flood Protection Board. The Board is required to enforce standards for the construction, maintenance, and protection of adopted flood control plans that will protect public lands from floods. The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River and the San Joaquin River, and designated floodways (Title 23 California Code of Regulations (CCR), Section 2).

A Board permit is required prior to starting the work within the Board's jurisdiction for the following:

- The placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee (CCR Section 6);
- Existing structures that predate permitting or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the encroachment has not been clearly established or ownership and use have been revised (CCR Section 6);
- Vegetation plantings that will require the submission of detailed design drawings; identification of vegetation type; plant and tree names (i.e. common name and scientific name); total number of each type of plant and tree; planting spacing and irrigation method that will be utilized within the project area; a complete vegetative management plan for maintenance to prevent the interference with flood control, levee maintenance, inspection and flood fight procedures (Title 23, California Code of Regulations CCR Section 131).

12-1

December 1, 2011
Mr. Ron Miller
Page 2 of 2

In accordance with CEQA Guidelines Section 15130 "Discussion of Cumulative Impacts. (a) An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," the lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable."

Vegetation requirements in accordance with Title 23, Section 131(c) states, "Vegetation must not interfere with the integrity of the adopted plan of flood control, or interfere with maintenance, inspection, and flood fight procedures."

The accumulation and establishment of woody vegetation that is not managed has a negative impact on channel capacity and increases the potential for flooding. When a channel develops vegetation that then becomes habitat for wildlife, maintenance to initial baseline conditions becomes more difficult as the removal of vegetative growth is subject to federal and state agency requirements for on-site mitigation within the floodway.

Hydraulic impacts – Hydraulic impacts due to encroachments could impede flows, reroute flood flows, and/or increase sediment accumulation. The Supplemental EIR should include mitigation measures for channel improvements and maintenance to prevent and/or reduce hydraulic impacts. Off-site mitigation outside of the State Plan of Flood Control should be used when mitigating for vegetation removed within the project location.

The permit application and Title 23 CCR can be found on the Central Valley Flood Protection Board's website at <http://www.cvpfb.ca.gov/>. Contact your local, federal and state agencies, as other permits may apply.

Should you have any further questions, please contact me by phone at (916) 574-0651, or via email at jherota@water.ca.gov.

Sincerely,



James Herota
Staff Environmental Scientist
Floodway Projects Improvement Branch

cc: Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, California 95814

12-1
Cont.

Response to Comment Letter 12

**Central Valley Flood Protection Board
James Herota, Staff Environmental Scientist
December 7, 2011**

12-1 The comment states that the proposed Fiddymment Ranch SPA 3 project is located in within the jurisdiction of the Central Valley Flood Protection Board. The comment also provides a list of project types and activities requiring a Board permit.

The proposed project would not involve any of the conditions or activities listed in the comment letter and would not alter vegetation within creeks or drainages. No comments on the content of the DSEIR are provided.

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110 Maple Street, Auburn, CA 96603 • (530) 745-2330 • Fax (530) 745-2373 • www.placer.ca.gov/scccd
Thomas J. Christoff, Air Pollution Control Officer

December 12, 2011

SENT VIA: egov@roseville.ca.us
rmiller@roseville.ca.us

Ron Miller
Planning & Housing Department
City of Roseville
311 Vernon Street
Roseville, CA 95647

SUBJECT: Fiddymt Ranch Phase 3 Specific Plan Amendment and associated Draft Subsequent Environmental Impact Report

Dear Mr. Miller,

Thank you for submitting the Fiddymt Ranch Phase 3 Specific Plan Amendment (Project) and associated Draft Subsequent Environmental Impact Report (DEIR) to the Placer County Air Pollution Control District (District) for review. The Project proposes to amend the West Roseville Specific Plan to accommodate 1,905 additional residential units and 79,170 square feet of commercial land uses in the City of Roseville. The project site is located within the Sacramento Valley Air Basin (SVAB) and is designated as nonattainment for federal and state ozone (O₃) standards, nonattainment for the federal particulate matter standard (PM_{2.5}) and state particulate matter standard (PM₁₀).

After review of the Project and DEIR, the District has the following comments regarding the analyses of the Project's impacts on local and regional air quality.

Short-term Construction-related Emissions

1. The District recommends that the District's rules and regulations should be listed as standard notes on all grading/improvement plans as a condition of approval for all subsequent projects.

For example, District Rule 228, Fugitive Dust establishes standards to be met by activities generating fugitive dust which applies to the entire County of Placer and addresses fugitive dust generated by construction and grading activities, and by other land use practices. All construction related activities associated with the buildout of the Project would be subject to District rules and regulations in effect at the time of construction. The District, therefore, recommends the City to list the District's rules and regulations as standard notes on all

13-1

Placer County Air Pollution Control District
December 12, 2011
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grading/improvement plans as a condition of approval for the Project (See Attachment 1: "District and State Rule Based Requirements: City Improvement Plans") to ensure that the contractor will be fully aware of the regulatory requirement.

2. The District recommends Mitigation Measure 7.1b identify contractors who supply fleets of equipment (minimum 50% of fleet) which provide Tier 3 level engines or greater. This measure should also be shown as a standard note on all subsequent grading and/or improvement plans.

The air quality modeling analysis (CalEEMod) prepared for the DEIR identified mitigation in an effort to reduce construction related criteria pollutants. Emissions were reduced with the requirement to have contractors supply 50% of construction equipment fleet consisting of Tier 3 level engines which also meet a minimum of a Level 1 Diesel Particulate Filter (DPF) for new construction/off-road equipment, or retrofit to meet this standard for fleets with older equipment¹. The District believes if a project claims credit for mitigation in the analysis, the mitigation should be incorporated as a mitigation measure in the DEIR. The District, therefore, recommends Mitigation Measure 7.1b specify the requirement to supply 50% of the equipment fleet use Tier 3 level engines or greater during all construction related phases of the Project. This measure should also be listed as a standard note on all subsequent grading and/or improvement plans.

3. The modeling analysis also identified as mitigation, limiting VOC emissions associated with the use of coatings, paint and sealants (implement at 50 g/L for interior, and 100 g/L for exterior) during the construction phase. Therefore, this measure should be incorporated as a Condition of Approval for all subsequent projects².
4. The modeling analysis should include emissions associated with the construction of the parking areas for non-residential land use types.

The modeling analysis prepared to estimate the Project's construction related emissions does not include emissions associated with the buildout of parking areas for the proposed nonresidential land uses. For all project types except residential, parking is to be evaluated as a separate land use in CalEEMod to calculate more accurate construction phase emissions for VOC and PM fugitive dust emissions. The District does not anticipate the increase in emissions would change the environmental conclusion or require the identification of new mitigation measures.

Long-term Operational Emissions

Criteria Pollutants & Toxic Air Contaminants Analysis and Mitigation

¹ Appendix D Air Quality Impact Analysis "CalEEMod SPA3 Assumptions List"
² Appendix D Air Quality Impact Analysis Section 5.0 page 5-38

City of Roseville, Fiddymont Ranch Phase 3 Specific Plan Amendment Subsequent DEIR



Placer County Air Pollution Control District
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5. The District recommends the following modification to MM 7.2a.

Wood burning or pellet appliances shall not be permitted within the Fiddymnt Development. Natural gas or propane fired fireplace appliances shall be clearly delineated on the Floor Plans submitted in conjunction with the Building Permit application.

The DEIR and CalEEMod modeling analysis assume no wood burning devices will be permitted within the development.

Cumulative Impacts

6. The District recommends updating the fee amount to reflect the current rate of \$16,640 as established by the California Air Resources Board Carol Moyer Guidelines

Mitigated operational emissions associated with the Project are estimated to result in 309.24 lbs/day of ROG and 227.97 lbs/day of NOx³. Impact 11.10 of the DEIR concludes that the Project would exceed the Placer County APCD recommended cumulative threshold of 10 lbs/day for ROG and NOx⁴ and will result in a cumulatively considerable net increase of ROG and NOx emissions for which the project region is non-attainment under the Federal and State Air Quality Standards.

Mitigation Measure 11.10a has been proposed to offset the Project's long-term criteria pollutant emissions in order to reduce ROG and NOx emissions from the Project⁵. The rate at which emissions would be offset has previously been based on \$14,300 per ton, as stated within the mitigation measure. The District recommends the City shall consider updating the fee amount in the DEIR to \$16,640 as the cost-effectiveness limit established by the California Air Resources Board Carol Moyer Guidelines⁶. Cost-effectiveness is a measure of the dollars provided to a project for each ton of covered emission reduced. The updated fee is currently recommended by the Sacramento Metropolitan Air Quality Management District and other districts though out the State.

According to the District's Offsite Mitigation Fee Calculation Spreadsheet, the Project will be required to offset 27.23 tons of ROG and 19.84 tons of NOx⁷. Based on the current California Air Resource Board Carol Moyer Guidelines, the total offsite mitigation fee is estimated as \$783,180, equivalent to \$187.54/dwelling unit.

3 Appendix D: Air Quality Impact Analysis, Section 5.0, Table 12, page 5-42

4 DEIR, IMPACT 11.10, page 11-19

5 DEIR, IMPACT 11.10, page 11-20

6 Carl Moyer Program Guidelines Appendix G: Cost Effectiveness Limit and Capital Recovery Factors (Updated April, 2011).

7 Placer County Air Pollution Offsite Mitigation Fee Calculation for City of Roseville Fiddymnt Ranch Phase 3 SPA

City of Roseville, Fiddymnt Ranch Phase 3 Specific Plan Amendment Subsequent DEIR

13-5
Cont.

13-6

- 7. Table 11.12 should be corrected to reflect the District's recommended cumulative threshold of 10 lbs/day.

Table 11.12: Mitigated Operational Emissions preceding the discussion appears to have inadvertently used the District's construction and project level threshold of 82 lbs/day. The cumulative threshold identified in Table 11.12 should be corrected to reflect 10 lbs/day.

13-7

- 8. The District recommends the incorporation of the following condition of approval for all subsequent projects.

Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require a permit(s) from the District. The applicant, developer, or operator who proposes the use of an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g., generators, compressors, pile drivers, lighting equipment) with an internal combustion engine over 50 horsepower are required to have a PCAPCD permit or a California Air Resources Board portable equipment registration.

13-8

Processes that discharge 2 pounds per day or more of air contaminants, as defined by Health and Safety Code Section 39013, to the atmosphere shall obtain a permit prior to operation. **Permits are required for both construction and operation.** Developers/contractors should contact the District prior to construction and obtain any necessary permits prior to the issuance of a Building Permit. *(Based on the California Health & Safety Code section 39013: <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=39001-40000&file=39010-39060>)*

Greenhouse Gas (GHG) Emissions

- 9. The discussion for Section 8.1 and 8.4 should reflect 4,176 residential units and not 4,716 units.
- 10. Mitigation Measure 8.2a should identify the nonresidential BuildItGreen score required for the commercial, school, and other nonresidential land use types sufficient enough to achieve the 15% reduction in energy related GHG emissions.

13-9

Based on the modeling assumptions in the CalEEMod modeling analysis, the exceedence of the Title 24 building code for all development (residential and nonresidential) would achieve GHG emission reductions necessary to reduce impacts to a less-than-significant level. However, the mitigation measure does not specify the non-residential development BuildItGreen score necessary to achieve this reduction, as assumed in the analysis.

Placer County Air Pollution Control District
December 12, 2011
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Again, thank you for submitting this project for review. Please do not hesitate to contact me at 530.745.2333 or via email at agreen@placer.ca.gov if you have any questions.

Respectfully submitted,



Angel Green
Associate Planner

cc: Yu-Shuo Chang, Senior Planner, PCAPCD

Enclosure (2)

City of Roseville, Fiddymont Ranch Phase 3 Specific Plan Amendment Subsequent DEIR

Placer County Air Pollution Control District
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ATTACHMENT 1

**District and State Rule Based Requirements
City Improvement Plans**

The following standard notes are recommended as a standard condition of approval or construction document language for all development projects within the Placer County Air Pollution Control District (APCD). These notes should be included on all Improvement Plans, Grading Plans, and/or Design Review Permits, including those projects exempt by CEQA.

- R1. Include the following standard note on the Improvement/Grading Plan: Construction equipment exhaust emissions shall not exceed Placer County APCD Rule 202 Visible Emission limitations. Operators of vehicles and equipment found to exceed opacity limits are to be immediately notified by APCD to cease operations and the equipment must be repaired within 72 hours. **(Based on APCD Rule 202)**
- R2. Include the following standard note on the Improvement/Grading Plan: The contractor shall suspend all grading operations when fugitive dust exceeds Placer County APCD Rule 228 (Fugitive Dust) limitations. The prime contractor shall be responsible for having an individual who is CARB-certified to perform Visible Emissions Evaluations (VEE). This individual shall evaluate compliance with Rule 228 on a weekly basis. It is to be noted that fugitive dust is not to exceed 40% opacity and not go beyond the property boundary at any time. Lime or other drying agents utilized to dry out wet grading areas shall not exceed Placer County APCD Rule 228 limitations. Operators of vehicles and equipment found to exceed opacity limits will be notified by APCD and the equipment must be repaired within 72 hours. **(Based on APCD Rule 228)**
- R3. Include the following standard note on the Improvement/Grading Plan: The prime contractor shall be responsible for keeping adjacent public thoroughfares clean of silt, dirt, mud, and debris, and shall “wet broom” the streets (or use another method to control dust as approved by the individual jurisdiction) if silt, dirt, mud or debris is carried over to adjacent public thoroughfares. **(Based on APCD Rule 228 / section 401.5)**
- R4. Include the following standard note on the Improvement/Grading Plan: During construction, traffic speeds on all unpaved surfaces shall be limited to 15 miles per hour or less. **(Based on APCD Rule 228 / section 401.2)**
- R5. a). Include the following standard note on the Improvement/Grading Plan: In order to minimize wind driven dust during construction, the prime contractor shall apply methods such as surface stabilization, establishment of a vegetative cover, paving, (or use another method to control dust as approved by the individual jurisdiction).

City of Roseville, Fiddymont Ranch Phase 3 Specific Plan Amendment Subsequent DEIR

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December 12, 2011
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- b). Include the following standard note on the Improvement/Grading Plan: The prime contractor shall suspend all grading operations when wind speeds (including instantaneous gusts) are excessive and dust is impacting adjacent properties. ***(Based on APCD Rule 228 / section 402)***
- R6. Include the following standard note on the Improvement/Grading Plan: The contractor shall apply water or use other method to control dust impacts offsite. Construction vehicles leaving the site shall be cleaned to prevent dust, silt, mud, and dirt from being released or tracked off-site. ***(Based on APCD Rule 228 / section 401.1, 401.4)***
- R7. Include the following standard note on the Improvement/Grading Plan: During construction, no open burning of removed vegetation shall be allowed unless permitted by the PCAPCD. All removed vegetative material shall be either chipped on site or taken to an appropriate recycling site, or if a site is not available, a licensed disposal site. ***(Based on APCD Rule 310)***
- R8. Include the following standard note on the Improvement/Grading Plan: A person shall not discharge into the atmosphere volatile organic compounds (VOC's) caused by the use or manufacture of Cutback or Emulsified asphalts for paving, road construction or road maintenance, unless such manufacture or use complies with the provisions Rule 217. ***(Based on APCD Rule 217).***
- R9. Include the following standard note on the Improvement/Grading Plan: Processes that discharge 2 pounds per day or more of air contaminants, as defined by Health and Safety Code Section 39013, to the atmosphere may require a permit. **Permits may be required for both construction and operation.** Developers/contractors should contact the District prior to construction and obtain any necessary permits prior to the issuance of a Building Permit. ***(Based on the California Health & Safety Code section 39013; <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=39001-40000&file=39010-39060>)***

NOTE: For complete listing of APCD Rules please visit:
<http://www.placer.ca.gov/Departments/Air/Rules.aspx>

Placer County Air Pollution Control District
 December 12, 2011
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ATTACHMENT 2

Placer County APCD Offsite Mitigation Fee Calculator

Project Name: Placer County APCD Offsite Mitigation Fee Calculation for City of Roseville Fiddymont Ranch Phase 2 SPA

Mitigation Fee Calculation

Emission Source	ROG (lbs/day)		NOx (lbs/day)		PM10 (lbs/day)	
	summer	winter	summer	winter	summer	winter
Area Resource	181.94		3.94			
Vehicle Exhaust	127.30		224.03			
*Total	309.24	0.00	227.97	0.00	299.50	229.50
<i>*DEIR Appendix D page 5-42</i>						
PCAPCD cumulative thresholds (lbs/day)	ROG (summer only)	NOx (summer only)	PM10 (winter only)			
operational emissions	10	10	80			
exceedence to the cumulative thresholds (lbs/day)	ROG 299.24	NOx 217.97	PM10 149.50			
# of days in summer (May-Oct)	182					
# of days in winter (Nov-Apr)	183					
Required emission offset (tons) (exceed lbs/day x days in summer/winter, 2000 lbs/ton)	ROG 27.23	NOx 19.84	PM10 13.68			0
Amount of required emission offset for ROG and NOx (tons)	47.07					
current mitigation cost for ROG or NOx \$/ton (per CARB Carol Moyer Guideline)	\$16,640					
current mitigation cost for PM \$/ton (to be determined)						
Proposed APCD Offsite Mitigation Fee (ROG + NOx)	\$783,180					
Proposed APCD Offsite Mitigation Fee (PM only)	\$0					

City of Roseville, Fiddymont Ranch Phase 3 Specific Plan Amendment Subsequent DEIR

Placer County Air Pollution Control District
December 12, 2011
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Per Unit Based on 4,176 units

\$187.54

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Response to Comment Letter 13

Placer County Air Pollution Control District Angel Green, Associate Planner, Planning & Monitoring Section December 12, 2011

- 13-1** The comment recommends that conditions of approval for the proposed project include a requirement to list the Air Pollution Control District (APCD) rules and regulations applicable to construction projects on project plans.

Conditions of approval do not need to be included as mitigation measures or addressed in the EIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

- 13-2** The comment recommends a modification to Mitigation Measure 7.1b as included in the 2011 DSEIR to be consistent with the modeling assumptions.

Mitigation Measure 7.1b was updated and revised in the 2013 RDSEIR and again in the P2R. No further revisions to the measure have been made. The measure is consistent with the CalEEMod modeling completed for the RDSEIR and P2R.

- 13-3** The comment recommended an additional mitigation measure be added to the 2011 DSEIR.

As stated in Comment 6-3, the APCD Rules address the volatile organic compound (VOC) content of paint, and this mitigation measure is no longer necessary.

- 13-4** The comment recommends that CalEEMod modeling of construction emissions include a specific emissions estimate for construction of parking lots included in the proposed project.

The CalEEMod modeling completed for the 2013 RDSEIR includes emissions associated with construction of parking lots.

- 13-5** The comment recommends a modification to the 2011 DSEIR Mitigation Measure 7.2a.

The recommended modification was made and is reflected in Mitigation Measure 7.2a as presented in the 2013 RDSEIR and the P2R (p. 7R-31). Specifically, section A of Mitigation Measure 7.2a includes the suggested language regarding prohibiting wood-burning and pellet appliances.

- 13-6** The comment recommends updating the per ton fee amount identified in Mitigation Measure 11.10a in the 2011 DSEIR.

Mitigation Measure 11.10a as presented in the P2R reflects the current fee amount.

13-7 The comment recommends correcting the cumulative impact threshold shown in table 11.12 of the 2011 DSEIR.

The correct cumulative impact threshold is shown in Table 11.10 of the 2013 RDSEIR and the P2R.

13-8 The comment suggests a condition of approval for the project that would state that projects that include construction, installation, or use of an emergency generator, boiler, or heater may be subject to permitting requirements through the APCD.

The comment does not address the content of the DSEIR. Conditions of approval do not need to be included as mitigation measures or addressed in the EIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

13-9 The comment identifies a typographical error in the 2011 DSEIR regarding the number of dwelling units proposed and recommends a revision to a mitigation measure in that document.

The discussion in the RDSEIR and P2R reflects the correct proposed unit count – specifically that the proposed project would increase residential units in the project area by 1,661 units, resulting in a total of 2,959 units within the project area.

Mitigation Measure 8.2a identifies the specific BuildItGreen scores that must be achieved by residential units on site. No BuildItGreen report was completed for non-residential buildings.

Municipal Services Agency
Robert B. Leonard, Administrator
Department of Transportation
Michael J. Penrose, Director



County Executive
Bradley J. Hudson

County of Sacramento

December 12, 2011

Ron Miller
Planning & Housing Department
311 Vernon Street,
Roseville, CA 95678
miller@roseville.ca.us

SUBJECT: COMMENTS ON THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE FIDDYMENT RANCH PHASE 3 SPECIFIC PLAN AMENDMENT.

Mr. Miller:

The Sacramento County Department of Transportation has received the Notice of Availability for the Draft Subsequent Environmental Impact Report (DSEIR) for the Fiddymment Ranch Phase 3 Specific Plan Amendment. We appreciate the opportunity to review this document and thank you for addressing our scoping needs as requested in the Notice of Preparation comments for this project. We have following comments:

- **Mitigation Measure 5.8a.** In the DSEIR calls for adding a northbound and southbound lane on Walerga Road. It should be noted that County of Sacramento General Plan designates Walerga Road as a four lane arterial and further widening of Walerga Road is not considered feasible. We suggest an alternative mitigation measure such as widening Watt Avenue which is another north south connection that links Placer County, the City of Roseville and Sacramento County. The County of Sacramento General Plan designates Watt Avenue as a six lane thoroughfare. So, widening Watt Avenue is a feasible alternative mitigation measure that will provide additional north south parallel capacity to Walerga Road. We would ask the City of Roseville to revise the mitigation measure and participate in paying a fair share towards Watt Avenue widening. Please enter into an agreement with the County of Sacramento Department of Transportation to pay for this alternative mitigation measure.

14-1

Should you have any questions, please feel free to contact me at (916) 875-2844.

Sincerely,

Kamal Atwal, P.E.
Department of Transportation



"Leading the Way to Greater Mobility"

Design & Planning: 906 G Street, Suite 510, Sacramento, CA 95814 . Phone: 916-874-6291 . Fax: 916-874-7831
Operations & Maintenance: 4100 Traffic Way, Sacramento, CA 95827 . Phone: 916-875-5123 . Fax: 916-875-5363
www.sacdot.com

Mr. Miller
Comments on the DSEIR for the Fiddymment Ranch Phase 3 Specific Plan Amendment
Page 2

KA:ka

Cc:

Dan Shoeman, DOT
Ron Vicari, DOT
Dean Blank, DOT
Matt Darrow, DOT
Bob Davison, County Engineering

Response to Comment Letter 14

**County of Sacramento Department of Transportation
Kamal Atwal, P.E.
December 12, 2011**

14-1 The comment requests a correction to mitigation in the 2011 DSEIR.

The requested change is reflected in Mitigation Measure 5.8a in the 2013 RDSEIR (page 5-55) and was confirmed by the County of Sacramento's comment letter dated December 19, 2013 (Comment Letter 7 in this Final SEIR).

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Comment Letter 15

December 12, 2011

Ron Miller
Planning & Housing Dept.
311 Vernon St.
Roseville, CA 95687

RE: DSEIR for West Roseville Specific Plan Amendment 3 (SPA 3)

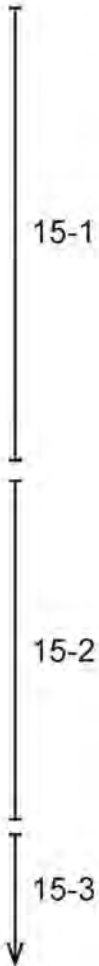
Dear Mr. Miller:

Thank you for this opportunity to comment on the City of Roseville’s draft supplemental environmental impact report (DSEIR) for the 3rd proposed plan amendment to the West Roseville Specific Plan, otherwise known as “SPA 3.” As you know this plan amendment represents a 45% increase in density as compared to the original West Roseville Specific Plan (WRSP).

I would like to echo the concerns spelled out by the Westpark Fiddymont Farm Neighborhood Association (WFFNA) in the presentation prepared and submitted to the City for a meeting before the Planning Commission, which has since been postponed. It is important that the City measure the impacts of SPA 3 to the existing environmental conditions, not simply the incremental impacts between the hypothetical build out of WRSP and the new SPA 3. In addition, I do not believe all significant impacts are captured in a supplemental EIR (especially given the original EIR is seven years old), and a new EIR should be drafted. Otherwise, the public and City of Roseville decision makers cannot be assured that the identified mitigation measures for SPA 3 will be adequate.

Furthermore, SPA 3 is tailor-made to satisfy the City’s Housing Element pursuant to the Sacramento Area Council of Governments (SACOG) low-income housing requirement, (SPA 3 is a “voluntary rezoning “ which is directly accounted for in the Housing Element’s calculus for meeting SACOG requirements in the current planning horizon). This makes the DSEIR’s statement that any additional densities for which SPA 3 is eligible under the City’s Density Bonus ordinance is “speculative”, quite absurd. The City and the project proponent are fully aware now of the density bonus incentives for which SPA 3 will be eligible and granting of additional densities under the Density Bonus ordinance is “reasonably foreseeable” and must be disclosed and analyzed for the public and decision makers under the EIR’s cumulative impacts section. The increased density incentives under the Density Bonus ordinance are significant in their own right, let alone when added to the 45% increase in density represented by SPA 3.

West Roseville is isolated from employment centers, major thoroughfares, public transportation, and shopping, to name a few. It appears that the dense housing in SPA 3 is a result of convenience, both to the project proponent looking to recoup land costs and to the



City, looking to meet SACOG requirements. Yet, this type of planning is lazy. Relying on "voluntary rezones" to make deals with developers seeking plan amendments to meet SACOG requirements will not get the City the results it should be looking for: well planned, thoughtful placement of low income and dense housing.

I believe the City should undertake a study to determine the best locations for low income and dense housing, and dispense with its over-reliance on making "behind the doors" deals with developers who happen to be seeking plan amendments, and calling these "voluntary rezones." That way, all the public and decision makers can have meaningful input to Roseville's future housing needs.

A housing study would inform the City regarding a meaningful alternative to SPA 3. The current range of alternatives is inadequate because the reduced density alternative is merely an arbitrary 20% reduction and does not meet the City's Housing Element. Again, given that SPA 3 is tailor-made to meet the City's Housing Element for low income housing, I question whether there are really any meaningful alternatives which reduce densities in West Roseville, analyzed in the DSEIR.

Thank you for your consideration.



Amy L. Aufdenberge

↑
15-3
Cont.

Response to Comment Letter 15

Amy Aufdemberge

December 12, 2011

15-1 The comment states that the impacts of the proposed project should be evaluated relative to the existing environmental conditions. The comment also expresses that significant impacts may not be fully accounted for in the DSEIR and that a new EIR should be prepared.

The 2011 DSEIR prepared for the Fiddlyment Ranch SPA 3 was revised and recirculated in 2013 (the RDSEIR) to reflect the revised project description.

The proposed project evaluated in the RDSEIR is a revision to the project that was evaluated in the WRSP EIR and approved in 2004, and does not constitute a new project. For changes to previously approved projects for which an EIR was prepared, CEQA establishes the process for conducting subsequent environmental review, as described in Public Resource Code §21166 and CEQA Guidelines §15162. This process is also described in Chapter 1 of the 2013 RDSEIR. As discussed in that chapter, the process of preparing a Subsequent EIR includes the following steps:

- identification of changes in the project and determine whether they are substantial;
- identification of changes in the circumstances under which the project would be undertaken and determine whether they are substantial;
- evaluation of whether the proposed project changes or changes in circumstances would result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- evaluation of changes in the proposed project compared to existing physical conditions in those areas where new or increased effects could occur; and
- identification of feasible mitigation measures to minimize (by avoiding, lessening, or compensating for) new or substantially more severe significant impacts identified in the Subsequent EIR.

These five steps in preparing a Subsequent EIR result in a legally adequate analysis of the environmental effects of the revised project. Specifically, the RDSEIR is based upon updated technical studies in the areas of traffic, noise, air quality and greenhouse gas emissions, and water supply. The descriptions and data that characterize existing conditions reflect the extent of development that has occurred in the project vicinity and the region since the original WRSP was approved, and the analysis of cumulative impacts takes into consideration other projects that have been approved since the original WRSP was approved as well as other reasonably foreseeable future projects.

- 15-2** The comment states that the DSEIR should account for potential increases in density resulting from the Density Bonus program in the cumulative impacts section.

Chapter 4 of the 2013 RDSEIR describes the Density Bonus program and explains why an analysis of development under the Density Bonus program as a component of the currently proposed project is not required under CEQA. As stated in Chapter 4, assuming that a project design consideration allowed under the Density Bonus program would be applied to the project site would be speculative because it is not yet known whether any parcels within the project area would be proposed for development under the Density Bonus program or which of the project design considerations allowed under the State of California Density Bonus law may be applied to a given parcel. In other words, the site-specific application of the Density Bonus law to any particular site will be based on whether affordable housing is proposed for a particular site and the affordability characteristics of the proposed project. Further, only the two proposed HDR parcels within the project site would be eligible for a density bonus. These parcels are each proposed to be zoned for a maximum density of 25 dwelling units per acre. The Housing Element found that “densities as low as 22 units per acre are appropriate for development of affordable housing.” (Housing Element p. X-66) Additionally, as shown in Table X-22 of the Housing Element, which summarizes existing affordable housing projects within the City, affordable housing has been successfully developed at densities ranging from 12.87 units per acre to 35 units per acre, with the majority of projects at densities less than 25 units per acre. All of the affordable housing projects with densities above 25 units per acre are senior housing projects. The densities for multi-family affordable housing projects range from 12.87 to 22.5 units per acre. Until site-specific projects with affordable housing components are proposed, the prediction of whether a density bonus would be requested for a particular site, and the size of the bonus, would be speculative; therefore it is not appropriate or required to assume use of the density bonus program in this SEIR. Any such project would be reviewed for compliance with CEQA and would be subject to public review.

- 15-3** The comment recommends that the City conduct a planning study to determine the best locations for low income and higher density housing, and states that the current range of alternatives is inadequate because the reduced density alternative does not comply with the City’s Housing Element.

The suggested housing study may be a beneficial tool for the city’s overall land use planning process, but is not required to evaluate the physical environmental effects of the proposed project.

CEQA requires an analysis of project alternatives that are potentially feasible to implement, have the potential to reduce or avoid one or more significant effects of the project, would support achievement of most of the basic project objectives, and will foster informed decision-making. Each of the alternatives evaluated in the RDSEIR, including the No Project (No Development), No Project (Buildout Under the Existing WRSP), and Reduced Density alternatives meet these requirements.

All standard City requirements for development would apply to any of the project alternatives, should they be selected for approval. This includes the City's requirement that all development within the WRSP provide a minimum of 10% of the units constructed as affordable housing. This would apply to the reduced density alternative, which would ensure it is consistent with the City's Housing Element. Further, the current zoning applied to the project site provides for Low Density Residential land uses, public/quasi-public land uses, and parks and open space. No Medium Density Residential or High Density Residential is permitted at the site currently. While the Housing Element identifies undeveloped lands throughout the City that could be capable of supporting affordable housing development, it does not propose to rezone specific properties. The reduced density alternative would introduce some medium and high density residential land uses to the site, which would increase the opportunities for development of affordable housing onsite, consistent with the goals and policies in the City's Housing Element.

To the extent that the Housing Element reports on existing land use allocations throughout the City (such as the summary of Undeveloped Residential Land Inventory By Plan Area in Table X-27, page X-68) and other statistics regarding housing conditions in the City, approval of the proposed project or the reduced density alternative would require amendments to the Housing Element, as well as several other sections of the General Plan. This does not indicate that the alternative or the proposed project is not feasible or not consistent with the goals and policies of the Housing Element.

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December 8th, 2011

City of Roseville – Planning Commission
311 Vernon Street
Roseville, CA 95678

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

I would like to submit my concerns over the SEIR currently pending consideration before your Commission.

SPA3 is a new project and is deserving of a full EIR, not a supplement.

I think there is significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.

I believe that the City needs to undertake a study to determine the best location for high density residential areas, which I believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.

I also believe that the homeowners of the Fiddymment Farm homes should be considered as stakeholders in any major decisions made in regards to this region. Our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA3 submission. I feel that the issues raised will have a substantial impact, not only on the residents of Fiddymment Farm, but in the overall well being of the City of Roseville.

Respectfully Submitted,

Kimberly Bowens
2596 Ranchland Way
Roseville, CA 95747

16-1
16-2

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Response to Comment Letter 16

Kimberly Bowens

December 8, 2011

16-1 The comment states that a full EIR should be prepared for the project rather than a supplement. The comment also states that the impacts of the proposed project on traffic, air, noise, schools, parks, fire, police, sewer, and water supply are significant, that these impacts not adequately addressed by a supplemental analysis, and that mitigation is therefore not adequately identified.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the 2013 RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions.

The impacts of the proposed project on traffic are evaluated in Chapter 5 of the RDSEIR, impacts of the proposed project on air quality are evaluated in Chapter 7, impacts related to noise are evaluated in Chapter 6, impacts related to schools, fire protection, and police protection are evaluated in Chapter 10, and impacts involving sewer service and water supply are evaluated in Chapter 9. Where the RDSEIR identifies potentially significant or significant impacts, mitigation measures are also identified to reduce significant impacts to the extent feasible. The project's potential impacts related to parks and recreation were determined to be consistent with the analysis of these impacts as presented in the WRSP EIR, as discussed in the Initial Study for the RDSEIR and in RDSEIR Chapter 1. In addition, other impacts related to parks and recreation are discussed in Chapters 4 and 10. The comment does not identify any specific deficiencies in the DSEIR analysis.

16-2 The comment recommends that the City conduct a study to determine the best location for high-density residential areas. The commenter believes that these areas should be located closer to main thoroughfares and employment centers rather than in West Roseville. Additionally, the comment states that the homeowners of Fiddymment Farms should be considered stakeholders and that their concerns should be given strong consideration with respect to the proposed project. The commenter believes that the issues raised by the project would have a substantial impact on both Fiddymment Farms and on the well-being of the residents of the City of Roseville.

As stated in Response to Comment 15-3, a planning study to determine locations for higher density housing is not required to evaluate the environmental effects of the proposed project. City decision makers will consider the comments and concerns of homeowners, as homeowners are considered to be stakeholders in the process of evaluating whether or not to approve the proposed project.

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December 8, 2011

RECEIVED
DEC 09 2011
Planning & Redevelopment
Department

To: The Honorable Planning Commission Members:
Re: Fiddymment Farm Specific Plan Amendment (SPA-3)

- SPA-3 is a new project that deserves no review at all, it should be scraped from the get go. Having made that statement, let me tell you why I feel that way. It seems like our city leaders are only interested in helping the developers get the low income housing percentage so they will continue to build. The builders will leave and the expense of the problems left behind will be for the home owners to deal with. I lived in Natomas for four years. It was great neighborhood and fully diversified. It wasn't until the city government decided to go beyond the promised numbers of apartments that our problems began. We were told the same things; it was suppose to be no big deal.

This growing neighborhood had almost zero crime incidents, so low in fact we had no police dedicated to our particular area. Soon we had thousands of apartments and with them came the rise in police incidences. The neighborhood went from 1 or 2 minor incidents a month to over 500. The incidences began small; cars were broken into, graffiti sprayed on cars and houses, fighting and theft. But it soon escalated into an arrest next door for armed robbery and the final straw only two blocks away a drive-by shooting and a murder. When the SAC PD families began to pack up and leave due to high crime, it was our wake up call. We left Natomas because of fear and a lack of personal safety and came to Roseville to remove ourselves from it and now we see this occurring all over again. The City of Roseville has a reputation for being a family oriented safe community and all the tax money and federal dollars in the world won't bring that reputation back once it has gone. Put the residents foremost in this decision.

- The full impact will never be known until it is too late. Ask our new Police Chief what the impact was in Natomas. He was a POP officer at the time in Sacramento and later head of the police team that tried to slow things down. He knows what this concentration of apartments will bring. Spread them out and not all in one place as the builder wants. I was a low income builder and I know the consequences of this kind of concentrated building.
- All services will have to be increased and there goes our taxes. Schools will need to be protected more for the younger children will have a higher risk almost immediately. Gang activity will grow between themselves and then extend out to the residence. Yes, this is a worse case scenario but even if some of it happens, it will be just one more issue to deal with in an already financially challenged budget.

17-1

- I would suggest a non-govt. team be involved when putting these statistics together. The government has access to information the residents do not and numbers can be made to say anything. Look at other projects and their impact when it comes to negative influence.
- Reduce the density. Even better yet spread it out. The builder will not like it due to higher cost but that's not our problem. This project and others like it are building a future where trouble will fester and the local residence and taxpayer will have to live with.
- Density is a good question, but we need to ask ourselves "What type of density"? Where there is a high concentration of elderly like here in Westpark and Sun City, they become targets for increased crime activity. People moved here because it was safe. This action will polarize the surrounding population and once the trouble begins there will be no stopping it. And those who would take care of the area will begin to leave. We certainly will.

As you can see, my major issue is with the increase in crime when you have high density building but the other consideration are no less important to the residents that live locally. I hear it from my neighbors every day. Some of the issues that are very important to them are increase in traffic, more schools to be built, decrease in air quality, to say nothing of upkeep on the parks, more police and fireman, and of course, the waste management. How can any of these concerns possibly be judged by a 6 year old WRSP EIR? Give the residence a current evaluation of the impact to our community.

17-1
Cont.



Greg Cerlenko, COO
Sacramento Habitat for Humanity, retired
2032 Thornecroft Lane
Roseville, CA 95747



Kristine Cerlenko
AT&T, retired
2032 Thornecroft Lane
Roseville, CA 95747

Response to Comment Letter 17

Greg Cerlenko and Kristine Cerlenko

December 8, 2011

17-1 The comment states that the higher densities proposed under the Fiddymment Ranch SPA 3 project have the potential to increase crime in the area and that the proposed apartments should be spread out. The comment also states that residents should be foremost in the project decision, that public services would need to be increased under the proposed, and that this would lead to increases in taxation. The comment recommends statistics about the project be assembled by a team of non-government employees. The comment also recommends reducing the density of the proposed project and states that areas with a high concentration of elderly residents, such as WestPark and Sun City, may become targets for the increased criminal activity. The comment also expresses concern regarding increased traffic, the need to build more schools, a decrease in air quality, increases in park maintenance requirements and demand for waste management, and the need for more police and fire protection. The comment questions how these concerns can be adequately evaluated by the WRSP EIR, due to the age of that analysis. The comment concludes that residents should be given a current evaluation of the proposed project's impacts on the community.

The project would not increase densities to levels that exceed those of other areas in the City of Roseville. The comment provides no evidence that the proposed project would lead to increased crime. The comment does not specify how crime statistics are related to an environmental impact analysis.

The impacts of the proposed project on traffic are evaluated in Chapter 5 of the RDSEIR; impacts of the proposed project on air quality are evaluated in Chapter 7; impacts related to noise are evaluated in Chapter 6; impacts related to public services including schools, fire protection, and police protection are evaluated in Chapter 10; impacts involving sewer service and water supply are evaluated in Chapter 9; and impacts involving waste management are addressed in Chapter 9 and in the Initial Study prepared for the RDSEIR (and provided in Appendix A to the RDSEIR). The project's potential impacts related to parks and recreation were determined to be consistent with the analysis of these impacts as presented in the WRSP EIR, as discussed in the Initial Study for the RDSEIR and in Chapter 1. In addition, other impacts related to parks and recreation are discussed in Chapters 4 and 10.

While impacts of the proposed project on taxes are not required to evaluate the environmental effects of the proposed project. Please see Response to Comment 10-1, which explains why the proposed project would not alter tax rates on existing developed parcels.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and Chapter 1 of the RDSEIR for a description of the environmental analysis that was conducted as part of the RDSEIR process. As described in Response to Comment 15-1 and in Chapter 1 of

the RDSEIR, the RDSEIR prepared for the Fiddymment Ranch SPA 3 project represents a legally adequate analysis. As discussed in Response to Comment 16-2, City decision makers will consider the comments and concerns of residents, as residents are considered stakeholders. The comment does not identify any specific deficiencies in the DSEIR analysis.

December 11, 2011

City of Roseville – Planning Committee
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

We would like to submit our concerns over the SPA-3 SEIR currently pending consideration before your Commission. Although members of the WFFNA Planning Committee met with members from the developers and Roseville Planning Department on November 8, 2011, to discuss our concerns, and attended the public meeting on November 10, 2011, we still have strong concerns over the information provided in the SEIR. I would like to express some of those concerns at this time.

I. Specific Concerns over the SEIR

- 1) The baseline of the SEIR seems to vary throughout. In some areas the baseline used for comparatives is the previous 2004 EIR, then in other sections it appears to be the "current existing conditions of when the report was requested" in late 2010. And in at least one instance, it cannot be either. For example, in Table 5.6 re traffic impacts, the land use reflected shows 233 single family homes and 156 multi-family homes as a baseline. That obviously could not reflect the original WRSP EIR as there was no building at that time. Nor could it reflect the "current" conditions as there were well over double that number of homes here in late 2010.
- 2) Table 12.4 seems to be misleading as well. In the Climate Change category, the report reflects that "Build-out under WRSP" would have "increased impacts" while SPA 3 impacts would be "less than significant". During our November 8th meeting, we specifically asked about the climate change issue—how can significantly more population have less impact than a lesser population. The response was that the new SEIR took into consideration new ecological improvements in building materials, etc. We then inquired if those same building conditions were used now (and why wouldn't they be), wouldn't the WRAP then be less significant than SPA 3, the response was yes. So it appears the report was comparing apples and oranges.

18-1
18-2

II. Density Concerns

- 1) The increasing overall density of this development continues to be high concern for WestPark – Fiddymment Farm residents. With each SPA submitted, the areas concerned have increased in overall density. We believe the truth to this is in the following information formulated from the Land Use Summary Chart Figure 3-2 of the SEIR.

18-3

**Land Use Summary Chart:
FIDDYMENT FARM - OVERALL DENSITY**

Area	Units	Acres	Overall Density
Phase 1-South of Blue oaks	822	194.3	4.23
North of Blue Oaks / non- SPA 3 (after SPA 2)	1107	193.4	5.72
Entire SPA 3 area - Current	2271	536.95	4.23
Entire SPA 3 area – Proposed	4176	525.5	7.95

The proposed area of SPA 3 alone would then exceed the original number of units approved for the entire Fiddymment Farm development of 4170 units. SPA 3 represents an increase of 45% to the entire Fiddymment Farm development, all concentrated to the north of Blue Oaks.

SPA 3 EXTREME DENSITY

Area	Units	Acres	Overall Density
SPA 3 Phase 3 – Current	397	176.2	2.25
SPA 3 Phase 3 - Proposed	1566	182.83	8.57

SPA 3 Phase 3 would be quadruple the density (400%) of that of the current WRSP build-out.

Even if SPA 3 were built out at the current density of SPA 2 it would be:
525.5 acres x 5.72 units per acre (SPA 2 density) = 3006 units [additional 735].

The real story of the density is in the SPA 3 Executive Summary pages 2-3 which shows the 6,112 proposed total units would now become:

Type	Existing Fiddymment Farm			Proposed SPA 3		
	Current %	Units	Avg. Density	SPA 3 %	Units	Avg. Density
LDR	67%	3067	4.23	53%	3,240	4.58
MDR	3%	131	7.4	12.1%	740	10.87
HDR	30%	7 facilities- up to 1410	20	34.9%	9 facilities- up to 2,132	25

This is a 14% decrease in LDR, 9.1% increase in MDR, and up to 722 more HDR units

- High Density Residential (HDR) land use is of major concern to WestPark and Fiddymment Farm residents. The Roseville Planning Department, being aware of our concerns in this area, presented an HDR chart that was supposed to reflect the percentages of HDR in the City of Roseville. Unfortunately, it is quite misleading. It compares the supposed amounts of HDR in each specific plan against each other. Our concerns are the amount of HDR being built out in the West Roseville, and away from the more convenient locations of commerce, easy transit, and medical

18-3
Cont.

provisions of town where HDR should be concentrated. This is a case of comparing apples and oranges again. The City's chart is:

Comparison of HDR in Specific Plans			
Specific Plan Area	Total Units	HDR units	% of HDR units
Downtown	1,020	981	96.2%
Riverside Gateway	346	170	49.1%
Southeast	3,163	1,384	43.7%
North Central	4,487	1,889	42.1%
Highland Reserve North	1,669	651	39.0%
Northeast	1,289	465	36.1%
Sierra Vista	6,650	1,905	28.6%
West*	10,697	3,071	28.7%
Stoneridge	2,861	746	26.1%
North	5,686	1,052	18.5%
Northwest	9,068	1,370	15.1%
Del Webb	3,210	100	3.1%
Total	50,146	13,784	27.5%

**Assumes approval of Voluntary Rezones*

City of Roseville, California

18-3
Cont.

In contrast to the City's chart, WFFNA provides the following version of those figures, which will show that the amount and percentage of HDR being loaded on the West Roseville area far exceeds that of other areas of the city.

(Please see chart on next page)

Comparison of HDR in Specific Plans

The chart provided by the City Planning Department is very misleading. It compares the percentage number of HDR units within each area individually, not as a comparison to the total HDR within the City. Thus it is comparing 'apples and oranges'. The chart should be showing the comparisons of units among the City as a whole. With the correct figures, the chart would read as follows:

Specific Plan Area	HDR Units	% of HDR Units
West Roseville* (incl. SPA 3)	3,071	22.3%
Sierra Vista	1,905	13.8%
North Central	1,889	13.7%
Southeast	1,384	10%
Northwest	1,370	9.9%
North Roseville	1,052	7.6%
Downtown	981	7.1%
Stoneridge	746	5.4%
Highland Reserve North	651	4.7%
Northeast	465	3.3%
Riverside Gateway	170	1.2%
Del Webb	100	0.7%

WestPark - Fiddymnt Farm Neighborhood Association

Overcrowding leads to serious social issues for traffic and parking, schools, and the environment of the entire area. This area is already gaining a considerable population, and will become even more impacted with the Sierra Vista and other developments starting in West Roseville.

III. Conclusion

The homeowners of the WestPark and Fiddymnt Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymnt Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymnt Farm, but in the overall well-being of the City of Roseville's future.

Sincerely submitted,

Loren Cook and Sue Hallahan-Cook
 2697 Pipestone Loop
 Roseville, CA 95747

18-3
 Cont.

Response to Comment Letter 18

Loren Cook and Sue Hallahan-Cook
December 11, 2011

- 18-1** The comment states that the baseline conditions in the EIR are not consistently described or applied to the impact analysis.

The 2013 RDSEIR defines the baseline environmental conditions as those that existed at the time that the Notice of Preparation for this EIR was circulated, specifically May 2013. This comment letter was submitted in response to the 2011 DSEIR. The baseline data in the traffic chapter (chapter 5) and all other chapters in the RDSEIR has been updated to reflect the conditions that existed at the time the Notice of Preparation for the RDSEIR was circulated.

- 18-2** The comment questions the conclusion in Table 12.4 that Alternative A, Buildout under the existing WRSP, would have more severe impacts related to greenhouse gas (GHG) emissions than the proposed project. The comment states that a greater population, as would be supported under the proposed project, would be expected to generate more GHG emissions.

The analysis of impacts related to GHG emissions in the 2011 DSEIR used a threshold of significance based upon an “efficiency metric” or a measurement of the amount of GHG emissions per person (which includes both residents and employees of development within the project site). Thus, while the comment is correct that the total GHG emissions would be greater under the proposed project than under Alternative A, the emissions per person would be higher under the existing WRSP, which does not require implementation of the GHG emission reduction measures included in the proposed project.

While the specific threshold of significance used in the 2013 RDSEIR is based on a percent reduction from the “business as usual” (BAU) scenario rather than the efficiency metric used in the 2011 DSEIR, the analysis of the relative impacts of the proposed project compared to Alternative A is still applicable. Development under the existing WRSP would represent the BAU scenario and would not achieve a 21% reduction in GHG emissions from BAU. Please see the Responses to Comments 6-4 to 6-6 for additional discussion regarding the analysis of the project’s GHG emissions and climate change impacts.

- 18-3** The comment discusses the extent to which the proposed project would increase overall density in the project area and the relative proportion of high density residential (HDR) land uses in the WRSP area compared to other areas of the City. The comment states that the project would lead to overcrowding of the area, which would result in significant impacts related to traffic, parking, schools, and the overall environment. The comment concludes that residents of Fiddymont Farms should be considered stakeholders in the process of evaluating the proposed project.

The impacts of the proposed project on traffic are evaluated in Chapter 5 of the RDSEIR. Impacts related to schools are evaluated in Chapter 10. As discussed in response to Comment 16-2, City decision makers will consider the comments and concerns of homeowners, as homeowners are considered stakeholders in the process of evaluating whether or not to approve the proposed project. The comment does not specifically address the content of the DSEIR.

Comment Letter 19

City of Roseville –Planning Commission

311 Vernon Street

Roseville, CA 95678

Honorable Planning Commission Members:

We would like to submit our concerns over the SEIR currently pending consideration before your Commission.

SPA 3 is a new project and is deserving of a full EIR, not a supplement. We don't believe the six year old analysis is sufficient, namely the areas of "aesthetics" and "solid waste." It doesn't seem believable that a 45% increase in density has been adequately studied.

We want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.

We think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. We believe that mitigation is, therefore, not adequately identified.

The SEIR's cumulative impact analysis is insufficient. For example, the following projects were not included in the cumulative impacts section of the SEIR: Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—all which will add an additional impact on this area.

The range of alternatives is inadequate and an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which we believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.

Overall, we are concerned with high density issues in general in our neighborhood and the high percentage of HDR in our area.

In closing, the homeowners of the WestPark and Fiddymment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville's future.

Sincerely submitted,

Marc Espinoza and Heidi Campbell

3290 Farleton Lane

19-1
19-2
19-3
19-4

Roseville, CA 95747

Response to Comment Letter 19

Marc Espinoza and Heidi Campbell

2011

- 19-1** The comment states that a full EIR should be prepared for the project rather than a supplement and that the prior environmental analysis is not sufficient to evaluate the impacts of the proposed project, particularly with respect to the proposed project's impacts to aesthetics and solid waste. The comment adds that the full impact of the proposed project should be studied as opposed to the incremental impact analysis provided in the DSEIR. Additionally, the comment expresses that the impacts of the proposed project on traffic, air, noise, schools, parks, fire, police, sewer, and water supply are significant, that these impacts not adequately addressed by a supplemental analysis, and therefore mitigation is not adequately identified.

Refer to Response to Comment 15-1 and Chapter 1 of the 2013 RDSEIR which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions. The proposed project evaluated in the RDSEIR is a revision to the project that was evaluated in the WRSP EIR and approved in 2004, and does not constitute a new project. The RDSEIR provides a legally adequate analysis of the environmental effects of the proposed project.

Refer to Response to Comment 16-1, which addresses concerns regarding mitigation measures and identifies a list of RDSEIR chapters where impact analyses for traffic, air quality, noise, schools, parks, fire protection, police protection, sewer service, and water supply are presented. Impacts of the proposed project related to aesthetics and solid waste are evaluated in detail in the Initial Study provided in Appendix A to the RDSEIR. In addition, the analysis of aesthetics impacts is summarized in Chapter 1 of the RDSEIR, and the analysis of solid waste impacts is summarized in Chapter 9 of the RDSEIR. This comment does not identify any specific deficiencies in the DSEIR.

- 19-2** The comment states that the environmental document's cumulative analysis does not include four key proposed projects (Sierra Vista, Curry Creek, Creekview, and Placer Ranch) or proposed projects in Placer County.

The cumulative scenario defined and analyzed in Chapter 11 of the RDSEIR includes these four projects as well as other development within Placer County. The cumulative impact analysis considers the contribution of these projects to significant cumulative impacts.

- 19-3** The comment states that the range of alternatives analyzed in the environmental document is not adequate and that the 20% reduction in density proposed under one of the alternatives is arbitrary and not meaningful. The comment recommends that the City conduct a study to determine the best locations for high-density residential areas. The commenter believes that these areas should be located closer to main thoroughfares and employment centers rather than in West Roseville.

In accordance with CEQA Guidelines Section 15126.6(a), the RDSEIR addresses a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any significant effects of the proposed revisions to the WRSP. The RDSEIR compares the impacts of these alternatives in comparison to the impacts of the proposed project. The RDSEIR analyzes the following alternatives: a No Project Alternative (no development), a second No Project Alternative (Buildout under WRSP), and a Reduced Development Alternative.

The 20% reduction evaluated in the Reduced Development Alternative was selected because it is a feasible alternative. With this level of reduced development, there is a potential for the project to remain feasible and to meet most of the basic project objectives. The EIR analyzes a reasonable range of alternatives that fosters informed decision-making. Refer to Response to Comment 15-3 for a discussion of the recommendation for the City to conduct a study regarding potential locations for high density housing.

19-4 The comment expresses general opposition to high density residential development. The comment also states that homeowners in WestPark and Fiddymment Farms should be viewed as stakeholders and that their concerns should be given strong consideration with respect to the proposed project. The comment concludes that the issues raised by the project would have a substantial impact on the residents of WestPark, the residents of Fiddymment Farms, and on the well-being of the City of Roseville.

Please refer to Response to Comment 16-2 regarding the role of homeowners as stakeholders in the process of evaluating the proposed project. General opposition to a project is not required to be addressed under CEQA. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project

From: Rich Fabbre [<mailto:rfabbre@comcast.net>]
Sent: Monday, December 12, 2011 3:30 PM
To: PlanningCommission@roseville.ca.us; Plan Ext Email Dist List
Cc: rfabbre@comcast.net
Subject: Fiddymment Farm Specific Plan Amendment (SPA-3) SEIR

December 12, 2011

City of Roseville – Planning Commission and Planning Staff
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3) SEIR

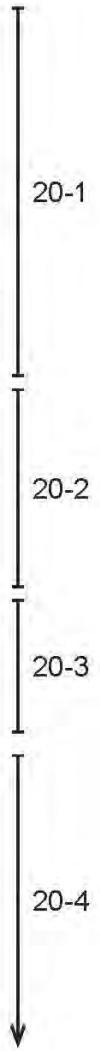
I am very concerned about the adequacy and the validity of the conclusions drawn by the Subsequent Environmental Impact Report on Fiddymment Ranch Specific Plan Amendment 3.

Specifically, I am concerned that the magnitude of the SPA 3 change requires a new EIR and is not eligible for a subsequent EIR. The northern part of Fiddymment Farm, the area which is covered by SPA 3, will nearly double in density if SPA 3 is approved. The laws and regulations that require environmental impact studies did not envision a change this large being eligible for a Subsequent EIR. It should have a completely new one.

Second, the EIR does not account at all for the planned Curry Creek development. According to the city of Roseville’s website, that development will include over 16,000 units. The writers of the EIR made a serious omission in not including that significant future population in their analysis of the impact that SPA 3 will have on the environment in West Roseville.

Third, I am concerned that the EIR does not use current conditions as the baseline as is required. Without a baseline condition, the subsequent analysis lacks meaning and validity.

Fourth, and most important to me, is the EIR’s selection of the Environmentally Superior Alternative. There’s an incredible amount words and data throughout the massive EIR document. However, when I boil it down, it seems to me that the only way the EIR writers were able to justify SPA 3 as being the Environmentally Superior Alternative was to base it on Climate Change. If one examines the other 11 areas, SPA 3 is never superior compared to the alternatives. But, the EIR concludes that SPA 3 is a better alternative when looking at the Climate Change area. On its face, this seems



incredible. How could the addition of 1905 of homes (about 5000 people) possibly have less impact on Climate Change than not crowding those 5000 people into the same land mass?

The logic--according to the EIR, on a per capita basis, apartments generate fewer emissions than single family homes. And, there will be a greater proportion of apartments in the northern part of Fiddymment Farm after SPA 3 then is currently planned. Therefore, there is likely (emphasis added) to be fewer emissions generated.

This is just not logical. Were there the same total number of units in SPA 3 as compared to currently planned and it was only a matter of increasing HDR and decreasing LDR, then this logic would probably be valid. However, there will be an additional 1905 units in SPA 3. Therefore, to make a conclusion on per capita evidence just does not make sense. I believe the EIR's conclusion that SPA 3 is the Environmentally Superior Alternative is grossly flawed and must be completely redone.

Thank You,

Rich Fabbre



20-4
Cont.

Response to Comment Letter 20

Rich Fabbre
December 12, 2011

- 20-1** The comment expresses concern regarding the adequacy and validity of the conclusions of the DSEIR. The comment states that the proposed project necessitates a new EIR, particularly due to its size, and cannot be adequately evaluated under a subsequent EIR.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the 2013 RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions. The five steps in preparing a Subsequent EIR result in a legally adequate analysis of the environmental effects of the revised project.

- 20-2** The comment states that the DSEIR does not include the proposed Curry Creek development in its analysis. The comment adds that this development would include over 16,000 units and that the EIR does not include the population growth associated with Curry Creek in the analysis of impacts in West Roseville.

Refer to Response to Comment 19-2 regarding the cumulative impacts analysis in the RDSEIR. The Curry Creek project and other reasonably foreseeable development in the region were considered in the cumulative impacts analysis.

- 20-3** The comment expresses concern that the DSEIR does not use current conditions as the baseline of environmental analysis and therefore the analysis presented in the DSEIR is not valid.

As stated in Response to Comment 18-1, the RDSEIR defines the baseline environmental conditions as those that existed at the time that the Notice of Preparation for this EIR was circulated, specifically May 2013. Also as stated in Response to Comment 15-1, the EIR relies on updated technical studies in several resource areas to ensure that impacts are evaluated in relation to the conditions that existed at the time the Notice of Preparation for the RDSEIR was prepared.

- 20-4** The comment states that the 2011 DSEIR incorrectly concludes that the proposed project is environmentally superior in comparison to the alternatives that were analyzed. Specifically, the comment questions the conclusion that multi-family housing results in fewer greenhouse gas (GHG) emissions than single-family housing on a per capita basis and that the proposed project would result in fewer impacts to climate change compared to the project alternatives.

Please refer to Response to Comment 18-2 which describes the use of the efficiency metric threshold in the DSEIR and the reduction from BAU threshold in the RDSEIR and why the proposed project would result in lesser impacts related to climate change

than the project alternatives. Please also refer to Response to Comment 6-4 for a detailed discussion of the reduction from BAU threshold.

**PHILIP L. HOSS
2057 DEVONPORT LOOP
ROSEVILLE, CA 95747**

City of Roseville – Planning Commission
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddyment Farm Specific Plan Amendment (SPA-3)

I would like to submit my concerns over the SEIR currently pending consideration before your Commission.

- SPA 3 is a new project and is deserving of a full EIR, not a supplement. Add teeth to this by going through the list of issues which are not analyzed because the 6 year old analysis is deemed sufficient and question those, the two that come to mind right now are "aesthetics" and "solid waste". Call them on that. It isn't believable that a 45% increase in density has already been sufficiently analyzed in the 6 year old WRSP EIR. 21-1
- I think it is important to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- There are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.
- The SEIR's cumulative impact analysis is insufficient and lists a specific project that the City knows about but was not included in the cumulative impacts section of the SEIR. Other projects include Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—all which shall add an additional impact on this area. 21-2
- The range of alternatives is inadequate and that an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which we believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville. 21-3
- Density issues—overall of the entire neighborhood, and more specifically about the high percentage of HDR in our area. 21-4

The homeowners of the WestPark and Fiddymment Farm areas should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville's future.

↑
21-4
Cont.

Respectfully submitted,

Philip L. Hoss
2057 Devonport Loop
Roseville, CA 95747

Response to Comment Letter 21

Philip L. Hoss
2011

21-1 The comment states that a full EIR should be prepared for the project rather than a supplement and that the original EIR is too old to adequately evaluate the proposed project, particularly with respect to the proposed project's impacts to aesthetics and solid waste. The comment also states that impacts to schools, parks, fire, police, sewer, and water supply would be significant, that these impacts not adequately addressed by a supplemental analysis, and that mitigation is therefore not adequately identified.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions.

Please also refer to Response to Comment 16-1, which addresses concerns regarding mitigation measures and identifies a list of RDSEIR chapters where impact analyses for traffic, air quality, noise, schools, parks, fire protection, police protection, sewer service, and water supply are presented. Impacts related to aesthetics and solid waste are discussed in detail in the Initial Study provided in Appendix A to the RDSEIR. In addition, the analysis of aesthetics is summarized in Chapter 1 of the RDSEIR, and the analysis of solid waste impacts is summarized in Chapter 9. The comment does not identify any specific deficiencies in the DSEIR.

21-2 The comment states that the environmental document's cumulative analysis does not include four key proposed projects (Sierra Vista, Curry Creek, Creekview, and Placer Ranch) or proposed projects in Placer County.

As discussed in Response to Comment 19-2, the cumulative impact analysis includes consideration of these projects.

21-3 The comment states that the range of alternatives analyzed in the environmental document is not adequate and that the 20% reduction in density proposed under one of the alternatives is arbitrary and not meaningful. The comment recommends that the City conduct a study to determine the optimal location for high-density residential areas. The commenter believes that these areas should be located closer to main thoroughfares and employment centers and instead of in West Roseville.

Please refer to Response to Comment 19-3 for a discussion of the RDSEIR analysis of project alternatives and to Response to Comment 15-3 for a discussion of the recommendation for the City to conduct a planning study regarding locations of high-density residential land uses.

21-4 The comment expresses general concern regarding high density development in the neighborhood and area. The comment also states that homeowners in WestPark and Fiddymment Farms should be viewed as stakeholders and that their concerns should be given strong consideration with respect to the proposed project. The comment concludes that the issues raised by the project would have a substantial impact on the residents of WestPark, the residents of Fiddymment Farms, and on the well-being of the City of Roseville.

Refer to Response to Comment 16-2 regarding the role of homeowners as stakeholders in the process of evaluating the proposed project.

City of Roseville – Planning Commission
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

I would like to submit my concern over the SEIR currently pending consideration before your Commission.

- SPA 3 is a new project and is deserving of a full EIR, not a supplement.

In particular the concern here is that the original six year old analysis does not seem sufficient in regards to "aesthetics" and "solid waste". A 45% increase in density requires a new study to ensure the city can handle the increased solid waste, without raising the garbage fees already charged to those living in Roseville. In this era of hard times, the City keeps raising the taxes/fees for garbage and water.

- I want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP. Why build more housing when the existing housing market even in the City is already depressed. The market has too many houses on the market as it is why add to this and depress prices further?

- I think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.

- The SEIR's cumulative impact analysis is insufficient and list a specific project that the City knows about but was not included in the cumulative impacts section of the SEIR. Other projects include Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—all which will add an additional impact on this area.

22-1

22-2

- The range of alternatives is inadequate and that an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas that I believe should be closer to main thoroughfares such as Roseville Parkway and employment centers, not isolated in West Roseville.

22-3

I have lived in the City of Roseville since 1996. STOP THE GROWTH AND CONTINUED HOUSING EXPANSION, enough is enough already. Stop the madness and take an example from the City of Davis that limits growth.

22-4

Sincerely submitted,

Harpaul Nagra

Fiddymment Neighbor

Response to Comment Letter 22

Harpaul Nagra
2011

22-1 The comment states that a full EIR should be prepared for the project rather than a supplement and that the original EIR is too old to adequately evaluate the proposed project, particularly with respect to the proposed project's impacts to aesthetics and solid waste. The comment states that an analysis is needed to determine if the City would be able to accommodate increases in solid waste and whether waste collection fees for existing residents would be increased. The comment also expresses concern about increased taxes and fees for water service. Additionally, the comment states that the full impact of the proposed project should be evaluated instead of the project's incremental impact. The comment expresses concern that additional housing in the City would harm the existing housing market in the City. The comment also states that impacts to schools, parks, fire, police, sewer, and water supply would be significant, that these impacts not adequately addressed by a supplemental analysis, and that mitigation is therefore not adequately identified.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions.

Impacts related to solid waste are discussed in detail in the Initial Study provided in Appendix A to the RDSEIR and summarized in Chapter 9. Impacts related to water supply are evaluated in detail in Chapter 9 of the RDSEIR. Please refer to Response to Comment 10-1 regarding the potential for the project to result in increased taxes for existing WRSP residents.

The EIR evaluates the physical environmental effects of the proposed project, as required under CEQA. The EIR is not required to address socio-economic effects such as increases in waste collection fees, increases in taxes and fees related to water service, and the effects of the project on the local housing market.

Refer to Response to Comment 16-1, which addresses concerns regarding mitigation measures and identifies a list of RDSEIR chapters where impact analyses for traffic, air quality, noise, schools, parks, fire protection, police protection, sewer service, and water supply are presented. The comment does not identify any specific deficiencies in the RDSEIR.

22-2 The comment states that the environmental document's cumulative analysis does not include four key proposed projects (Sierra Vista, Curry Creek, Creekview, and Placer Ranch) or proposed projects in Placer County.

As discussed in Response to Comment 19-2 regarding cumulative analysis, the EIR does consider the effects of these projects in the cumulative scenario.

22-3 The comment states that the range of alternatives analyzed in the environmental document is not adequate and that the 20% reduction in density proposed under one of the alternatives is arbitrary and not meaningful. The comment recommends that the City conduct a study to determine the optimal location for high-density residential areas. The commenter believes that these areas should be located closer to main thoroughfares and employment centers instead of in West Roseville.

Refer to Response to Comment 19-3 for a discussion of the RDSEIR analysis of project alternatives and to Response to Comment 15-3 for a discussion of the recommendation for the City to conduct a planning study regarding locations of high-density residential land uses.

22-4 The comment expresses general opposition to growth and housing development and recommends that the City use the City of Davis as a model example of limiting growth.

The comment does not address the proposed project or the content of the SEIR. No response is required.

December 11, 2011

City of Roseville – Planning Commission
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

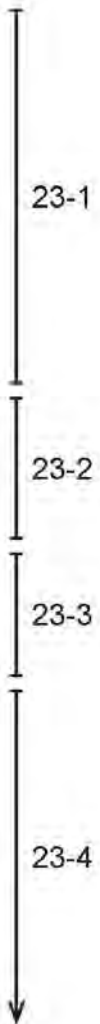
RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

We would like to submit my concerns over the SEIR currently pending consideration before your Commission.

SPA 3 is a new project and is deserving of a full EIR, not a supplement. The old analysis that is being used is 6 years old. The 45% increase in density which SPA 3 proposes is not part of the WRSP EIR.

- We want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- We think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. We believe that mitigation is, therefore, not adequately identified.
- The SEIR's cumulative impact analysis is insufficient. There are other project that are not included in the cumulative impacts section of the SEIR that will add an additional impact on this area specifically Sierra Vista, Curry Creek, Creekview, and Placer Ranch.
- The range of alternatives is inadequate and that an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which we believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.
- Density issues—overall of the entire neighborhood, and more specifically about the high percentage of HDR in our area.

In closing, you could express some unity as a homeowner, the homeowners of the WestPark and Fiddymment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville's future.



I have resided in this area now for 3yrs and within that short timeframe have seen quite a bit of change which have been for the worse. Please don't create more problems in a community that was originally to be a haven that we call home.

↑
23-4
Cont.

Sincerely,



Theresa Olivares



Chris Bailey

2101 Greatfield Drive, Roseville, CA 95747

Response to Comment Letter 23

Theresa Olivares and Chris Bailey

December 11, 2011

- 23-1** The comment states that a full EIR should be prepared for the project rather than a supplement and that the environmental analysis prepared six years ago is not sufficient to evaluate the impacts of the proposed project. The comment states that the density increase proposed under the Fiddymont Ranch SPA 3 project is not evaluated under the WRSP EIR. The comment adds that the full impact of the proposed project should be studied and states that the existing analysis evaluates the incremental impact of the proposed project on the buildout of the WRSP. Additionally, the comment expresses that the impacts of the proposed project on traffic, air, noise, schools, parks, fire, police, sewer, and water supply are significant and that these impacts not adequately addressed by supplemental analysis. The comment states that mitigation is therefore not adequately identified.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions.

Please refer to Response to Comment 16-1, which addresses concerns regarding mitigation measures and identifies a list of RDSEIR chapters where impact analyses for traffic, air quality, noise, schools, parks, fire protection, police protection, sewer service, and water supply are presented. The comment does not identify any specific deficiencies in the DSEIR analysis.

- 23-2** The comment states that the environmental document's cumulative analysis does not include four key proposed projects (Sierra Vista, Curry Creek, Creekview, and Placer Ranch) or proposed projects in Placer County.

As discussed in Response to Comment 19-2 regarding cumulative analysis, the EIR does consider the effects of these projects in the cumulative scenario.

- 23-3** The comment states that the range of alternatives analyzed in the environmental document is not adequate and that the 20% reduction in density proposed under one of the alternatives is arbitrary and not meaningful. The comment recommends that the City conduct a study to determine the optimal location for high-density residential areas. The commenter believes that these areas should be located closer to main thoroughfares and employment centers and instead of in West Roseville.

Refer to Response to Comment 19-3 for a discussion of the RDSEIR analysis of project alternatives and to Response to Comment 15-3 for a discussion of the recommendation for the City to conduct a planning study regarding locations of high-density residential land uses.

23-4 The comment expresses general concern regarding high density development in the neighborhood and area. The comment also states that homeowners in WestPark and Fiddymment Farms should be viewed as stakeholders and that their concerns should be given strong consideration with respect to the proposed project. The comment concludes that the issues raised by the project would have a substantial impact on the residents of WestPark, the residents of Fiddymment Farms, and on the well-being of the City of Roseville. The commenter states that negative changes have been taking place in the community within a short timeframe and asks decision-makers to not create more issues in the community.

Refer to Response to Comment 16-2 regarding the role of homeowners as stakeholders in the process of evaluating the proposed project.

Draft Letter Sample

City of Roseville – Planning Commission
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

We would like to submit our concerns over the SEIR currently pending consideration before your Commission.

We bought our home in WestPark in April 2007 and in that short time span, significant changes to our residential area have been proposed several times. We are not opposed to all planning changes in the area, but we are opposed to SPA-3 and ask you to reconsider your position.

We do not believe that significant analysis of the impacts SPA-3 would create has been conducted. We also believe that a full Environmental Impact Report is required and that the six-year-old EIR isn't sufficient. We are confident that considerations to solid waste and aesthetics have not been fully considered and we further believe that the changes proposed in SPA-3 would impact both greatly.

We remain extremely concerned with any proposal that dramatically increases the high density housing, as SPA-3 proposes to do. Though we are aware of financial pressures placed on land developers to turn a profit, we don't believe that their desire for profitable gain should come at the expense of the quality of life of WestPark and Fiddymment Farms' current residents. With the minimal high-density housing that already exists in the area, we have seen an increase in vandalism and attempted burglaries, as well as an enormous increase in the number of drivers speeding and ignoring traffic signs on Hayden Parkway.

The homeowners of the WestPark and Fiddymment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville's future.

Sincerely submitted,

Monte and Anissa Routon
101 Allimore Court
Roseville, CA 95747

24-1

24-2

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Response to Comment Letter 24

**Monte and Anissa Routon
2011**

24-1 The comment states that significant changes have been proposed to the residential area several times and expresses general opposition to the proposed project. The comment states that sufficient analysis of the impacts that would be caused by the proposed project has not been conducted. The comment states that a full EIR should be prepared for the project and that the prior environmental analysis is not sufficient to evaluate the impacts of the proposed project. In particular the comment states that the proposed project would impact both aesthetics and solid waste, and these impacts are not evaluated in the 2011 DSEIR.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions. Please refer to Response to Comment 19-1 regarding the RDSEIR analysis of the project's impacts related to aesthetics and solid waste.

24-2 The comment expresses concern about increasing high-density residential development in the areas of WestPark and Fiddymment Farms. The comment states that vandalism, attempted burglaries, and speeding traffic have increased since the addition of minimal high-density housing to the area. The comment also states that homeowners in WestPark and Fiddymment Farms should be viewed as stakeholders and that their concerns should be given strong consideration with respect to the proposed project. The comment concludes that the issues raised by the project would have a substantial impact on the residents of WestPark, the residents of Fiddymment Farms, and on the well-being of the City of Roseville. The commenter states that negative changes have been taking place in the community within a short timeframe and asks decision-makers to not create more issues in the community.

As discussed in Response to Comment 17-1 the project would not increase densities to levels that exceed those of other areas in the City of Roseville. The comment provides no evidence that the proposed project would lead to increased crime. Increases in crime and traffic violations are outside of the scope of environmental review under CEQA.

Refer to Response to Comment 16-2 regarding the role of homeowners as stakeholders in the process of considering the proposed project.

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City of Roseville – Planning Commission
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3)

I would like to submit my concerns over the SEIR currently pending consideration before your Commission.

- SPA 3 is a new project and is deserving of a full EIR, not a supplement. It don't believe that a 45% increase in density has already been sufficiently analyzed in the 6 year old WRSP EIR.
- I want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- I think there are significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a mere supplemental analysis. I believe that mitigation is, therefore, not adequately identified.
- The SEIR's cumulative impact analysis is insufficient. Other projects such as Sierra Vista, Curry Creek, Creekview, Placer Ranch, Placer County, etc.—will all add an additional impact on this area and must be included the impact analysis.
- The range of alternatives is inadequate and an arbitrary reduction of 20% density is not meaningful. The City needs to undertake a study to determine the best location for high density residential areas which I believe should be closer to main thoroughfares and employment centers, not isolated in West Roseville.

25-1

25-2

25-3

The homeowners of the WestPark and Fiddymment Farm homes should be seen as stakeholders in any major decisions made in this region. As such, our concerns should be given strong consideration in the matter of the Fiddymment Farm SPA 3 submission. We feel the issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of roseville's future.

Sincerely submitted,

Tom Stevens
2025 Cove Lane
Roseville, CA 95747

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Response to Comment Letter 25

Tom Stevens
2011

25-1 The comment states that a full EIR should be prepared for the project rather than a supplement. The comment states that the density increase proposed under the Fiddymment Ranch Specific Plan Amendment 3 is not sufficiently evaluated under the WRSP EIR. The comment adds that the full impact of the proposed project should be studied instead of the incremental impact evaluated in the current analysis. Additionally, the comment expresses that the impacts of the proposed project on traffic, air, noise, schools, parks, fire, police, sewer, and water supply are significant, these impacts not adequately addressed by a supplemental analysis, and therefore mitigation is not adequately identified.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions.

Please refer to Response to Comment 16-1, which addresses concerns regarding mitigation measures and identifies a list of RDSEIR chapters where impact analyses for traffic, air quality, noise, schools, parks, fire protection, police protection, sewer service, and water supply are presented. The comment does not identify any specific deficiencies in the DSEIR analysis.

25-2 The comment states that the environmental document's cumulative analysis does not include four key proposed projects (Sierra Vista, Curry Creek, Creekview, and Placer Ranch) or proposed projects in Placer County.

As stated in Response to Comment 19-2, the cumulative impact analysis reflects consideration of these projects.

25-3 The comment states that the range of alternatives analyzed in the environmental document is not adequate and that the 20% reduction in density proposed under one of the alternatives is arbitrary and not meaningful. The comment recommends that the City conduct a study to determine the optimal location for high-density residential areas, suggesting that these areas should be located closer to main thoroughfares and employment centers instead of in West Roseville. The comment also states that homeowners in WestPark and Fiddymment Farms should be viewed as stakeholders and that their concerns should be given strong consideration with respect to the proposed project. The comment concludes that the issues raised by the project would have a substantial impact on the residents of WestPark, the residents of Fiddymment Farms, and on the well-being of the City of Roseville. The comment states that decision makers should evaluate the project in the context of negative changes that have been taking place in the community within a short timeframe.

Please refer to Response to Comment 19-3 for a discussion of the RDSEIR analysis of project alternatives; please refer to Response to Comment 15-3 for a discussion of the recommendation for the City to conduct a planning study regarding locations of high-density residential land uses; and please refer to Response to Comment 16-2 regarding the role of homeowners as stakeholders in the process of considering the proposed project.

December 8th, 2011

City of Roseville – Planning Committee
311 Vernon Street
Roseville, CA 95678

Honorable Planning Commission Members:

RE: Fiddymment Farm Specific Plan Amendment (SPA-3) & the SEIR

My husband and I, and our two children, moved into Fiddymment Farms three years ago. We are extremely concerned about the SEIR that is currently under consideration by your Commission. Please take the following comments into account before coming to a final disposition on this matter:

- SPA 3 is actually a new project, which should merit a full EIR instead of a supplement. SPA 3 would include a 45% density increase, which is substantial. Additionally, the WRSP EIR (approved in 2004) is seven years old, and therefore the SEIR comparisons cannot meet the CEQU guidelines. Decision-makers, who are supposed to take the public's input into account, simply cannot determine all of the potential impact of SPA 3 through the supplemental analysis. A full and comprehensive EIR should be required in this case.
- We and our neighbors want to know the full impact of SPA 3, not simply the incremental impact of SPA 3 on the hypothetical build-out of the WRSP.
- We believe that there will be significant impacts to traffic, air, noise, schools, parks, fire, police, sewer and water supply, that are not captured by a supplemental analysis. Mitigation is, therefore, not adequately identified.
- We chose to live in the WestPark/Fiddymment Farms neighborhood based on the density proposed in initial plans. We would have purchased a home elsewhere if we had anticipated such a great increase in density in this area (with the proposed HDR in the west Roseville Specific Plan already almost double that of any other existing area!). The city should stand by original proposals which drew so many to this area.
- High density residential areas should ideally be positioned closer to main thoroughfares, employment centers, grocery stores, etc. West Roseville does not fit this description, and therefore should not be the proposed position for such a focused region of HDR homes.
- The SEIR's cumulative impact analysis is insufficient, and did not include the impact of other projects such as Creekview, Placer Ranch, Sierra Vista, etc. The cumulative impact on West Roseville will most likely be substantial. This error of omission is significant and shortsighted.
- The decision makers in the city and all of the residents have a right to fully understand the full impact of the proposed developments and changes to original plan to understand implications in the residents' immediate lives and those of our children. Short-cutting the process without a full EIR does not do anyone any good. This SEIR needs to be rejected, and a full EIR should be completed.

26-1

26-2

26-3

26-4

All of the residents of WestPark and Fiddymment Farm homes should be seen as essential and primary stakeholders in any major decisions made that impact this region, our homes, and our families. Our concerns should be given strong consideration and top priority in the matter of the Fiddymment Farm SPA 3 submission. The issues raised will have a substantial impact, not only on the residents of WestPark and Fiddymment Farm, but in the overall well-being of the City of Roseville.

Sincerely,

Julie Whitman
125 Waterlily Ct, Roseville (Fiddymment Farms)

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Response to Comment Letter 26

Julie Whitman
December 8, 2011

26-1 The comment expresses general concern regarding the Subsequent EIR prepared for the proposed project. The comment states that a full EIR should be prepared for the project rather than a supplement and that the prior environmental analysis is not sufficient to evaluate the impacts of the proposed project. The comment adds that use of the WRSP EIR in evaluating the proposed project does not meet CEQA Guidelines and that decision-makers would not be able to adequately determine the potential impacts of the proposed project through this supplemental analysis. The comment states that a full EIR should thus be required, that the full impact of the proposed project should be studied, and that the existing analysis evaluates the incremental impact of the proposed project on the buildout of the WRSP. The comment additionally expresses that the impacts of the proposed project on traffic, air, noise, schools, parks, fire, police, sewer, and water supply are significant, are not adequately addressed by supplemental analysis, and therefore mitigation is not adequately identified.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions.

Refer to Response to Comment 16-1, which addresses concerns regarding mitigation measures and identifies a list of RDSEIR chapters where impact analyses for traffic, air quality, noise, schools, parks, fire protection, police protection, sewer service, and water supply are presented. The comment does not identify any specific deficiencies in the DSEIR analysis.

26-2 The comment expresses concern about high-density residential development and states that the City should develop the WestPark and Fiddymment Farms area in a manner that is consistent with the original plans for the area. Additionally, the comment states that high-density residential development should be sited closer to main thoroughfares, employment centers, and grocery stores, and that West Roseville is therefore not conducive to high-density residential development and should not be the site of high-density residential development.

The environmental effects of placing high-density residential development in the project area are evaluated in the RDSEIR. The comment does not identify any specific deficiencies in the DSEIR analysis.

26-3 The comment states that the environmental document's cumulative analysis does not include four key proposed projects (Sierra Vista, Curry Creek, Creekview, and Placer Ranch) or proposed projects in Placer County. The comment states that the

cumulative impact of these projects on West Roseville would likely be substantial and that these projects should not have been omitted.

As stated in Response to Comment 19-2, the cumulative analysis reflects consideration of these projects.

26-4 The comment states that the full impact of the proposed project should be disclosed to decision-makers and residents and that the Subsequent EIR should be rejected in favor of preparing a full EIR. The comment also states that homeowners in WestPark and Fiddymont Farms should be viewed as stakeholders and that their concerns should be given strong consideration with respect to the proposed project. The comment concludes that the issues raised by the project would have a substantial impact on the residents of WestPark, the residents of Fiddymont Farms, and on the well-being of the City of Roseville.

The project analyzed in the RDSEIR consists of proposed changes to the previously approved WRSP. Please refer to Response to Comment 15-1 and to Chapter 1 of the RDSEIR, which describe the process for preparing a Subsequent EIR to provide a complete analysis of the project's impacts relative to existing conditions.

Please refer to Response to Comment 16-2 regarding the role of homeowners as stakeholders in the process of considering the project.

Response to Verbal Comments

Received at City of Roseville Planning Commission
November 14, 2013 and December 12, 2013

Comments Received on November 14, 2013

VC-1 Commenter Loren Cook stated that he is concerned with the project's proposed increase in residential density.

The RDSEIR evaluates the environmental effects that could result from the proposed increase in residential density.

VC-2 Commenter Cook stated that he is concerned with the increase in water demand that would result from the proposed project and whether the project would be required to conserve water.

Chapter 9A of the RDSEIR provides a detailed analysis of the project's water demand, water conservation plan, and the City's water supply. The RDSEIR finds that the City's current water supply is sufficient to serve the project, even in dry and multiple-dry years.

VC-2 Commenter Cook stated that he is concerned that the proposed project would result in a significant traffic impact at the Fiddymment Road/Baseline Road intersection.

The City's LOS policy is to maintain LOS C at a minimum of 70% of all signalized intersections in the city during the PM Peak hour. As shown in Table 5.4 of the RDSEIR, the Fiddymment Road/Baseline Road intersection currently operates acceptably at Level of Service (LOS) C in the AM Peak Hour, but operates at LOS E in the PM Peak Hour. As shown in Table 5.7, under existing plus project conditions, the LOS at this intersection would not change. As discussed on page b5-31, implementation of the City's Capital Improvement Program (CIP) would provide for construction of a second eastbound left turn lane which would improve LOS at this intersection to LOS B. The project would contribute a fair-share amount to this construction, therefore, the project's impacts at this intersection would be less than significant.

Additionally, the impacts of the project at this intersection in the 2025 CIP condition are evaluated on page 5-45 of the RDSEIR. The project would contribute to a decrease in LOS at this intersection. Due to right of way constraints, it is not feasible to construct improvements that would provide LOS C or better at this intersection. Therefore the RDSEIR identifies this as a significant and unavoidable impact.

VC-3 Commenter Cook states concern that current residents bought into the original WRSP and did not expect it to change.

The RDSEIR evaluates the environmental effects that would result from the proposed changes. This comment does not address the adequacy of the RDSEIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

Comments Received on December 12, 2013

VC-4 Commenter Loren Cook stated that he is not opposed to an increase in residential units in the project area, but that an increase needs to be managed and the proposed 1,661-unit increase is too much.

The RDSEIR evaluates the environmental effects that could result from the proposed 1,661-unit increase. General opposition to the size of the project is not required to be addressed under CEQA, and this comment does not address the content of the RDSEIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

VC-5 Commenter Cook stated that the City's Regional Housing Needs Allocation (RHNA) obligations can be solved in other locations in the City and questions why meeting RHNA obligations is addressed only in the proposed project and not in other recent projects, such as the recent WestPark Phase 4 project.

One of the project objectives, as stated on page 3-11 of the RDSEIR is to "aid the City in meeting its RHNA obligations" and the RDSEIR evaluates the environmental effects of adding high density residential areas to the project site. This comment does not address the content of the RDSEIR. This comment, along with all comments on the EIR, will be considered by the City Council as part of their deliberations on the project.

VC-6 Commenter Cook states that Roseville Fire Department (RFD) Station 9 has the largest territory in the City and Station 10 will not be constructed for a couple years. The commenter asserts that the western area of the city is served by only one fire engine.

Provision of fire protection services to the project site is evaluated in Chapter 10 of the RDSEIR. As stated on page 10-3, Station 9 is the first responding station to calls in the WRSP area. As stated on page 10-12, station 5 would provide secondary response in the short-term and the future station 8 would provide secondary response in the long-term. This secondary response ensures that more than one fire engine is available to provide emergency response services in the West Roseville. In addition, as discussed on page 10-3 RFD has mutual aid agreements and automatic aid agreements with several other fire protection districts and departments in the region. As stated on page 10-11, the RFD has indicated that fire protection services in the project area would meet all of the City's requirements – response times will be four minutes or less 80% of the time, an ISO rating of 3 will be maintained, and RFD will be able to deliver 500 gallons of water per minute to a fire scene. The impacts of the project on fire protection services in the project region would be less than significant.

VC-7 Commenter Cook summarized anticipated housing development in West Roseville and other projects anticipated in the region, such as Placer Ranch and Amoruso Ranch. The commenter stated that more commercial development is needed.

The cumulative scenario defined and analyzed in Chapter 11 of the RDSEIR includes these projects as well as other development within Placer County. The cumulative impact analysis considers the contribution of these projects to significant cumulative impacts.

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