

North Roseville Specific Plan  
Phase 3

Final Environmental Impact Report  
(SCH #1999061039)

Prepared for:

City of Roseville Planning Department

Prepared by:

EIP Associates

September 2000

**North Roseville Specific Plan Phase 3  
Final Environmental Impact Report**

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City of Roseville  
Planning Department

Prepared by:

EIP Associates  
Sacramento, California

September 2000

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*TABLE OF CONTENTS*

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*TABLE OF CONTENTS*

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1.	INTRODUCTION .....	1-1
2.	CHANGES TO THE DRAFT EIR .....	2-1
3.	WRITTEN COMMENTS AND RESPONSES .....	3-1
	LETTER 1: Wayne S. White, U.S. Fish and Wildlife Service .....	3-1
	LETTER 2: Tim Vendlinski, U.S. Environmental Protection Agency .....	3-7
	LETTER 3: Megan Cambridge, Department of Toxic Substances Control .....	3-9
	LETTER 4: Governor's Office of Planning and Research (May 19 and July 14, 2000) .....	3-10
	LETTER 5: Shauna Lorance, San Juan Water District .....	3-11
	LETTER 6: Deborah Cubberly, Placer County Local Agency Formation Commission .....	3-12
	LETTER 7: Paul Thompson, Placer County Planning Department .....	3-15
	LETTER 8: William J. Moore, Placer County Department of Public Works ...	3-16
	LETTER 9: Douglas G. Libby, Sutter County Community Services Department	3-17
	LETTER 10: Denny Jones, Roseville Joint Unified School District .....	3-21
	LETTER 11: Stephen L. Des Jardins .....	3-22
	LETTERS RECEIVED AFTER THE CLOSE OF THE COMMENT PERIOD	
	LETTER 12: Paul Thompson, Placer County Planning Department .....	3-24

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*Table of Contents*

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4. PUBLIC HEARING MINUTES

Parks and Recreation Commission, July 10, 2000  
Planning Commission, July 13, 2000

APPENDIX A:

Mitigation Monitoring Plan

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## *1. INTRODUCTION*

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## 1. INTRODUCTION

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This Final Environmental Impact Report (FEIR) for the North Roseville Specific Plan (NRSP) Phase 3 was prepared in order to respond to public comments received on the Draft EIR, which was circulated from May 3, 2000 to July 13, 2000.

### Project Background

The project analyzed in the Draft EIR encompasses a total of 160 acres and proposes development of 580 low-density residential units on 119.1 acres, 99 medium-density residential units on 11.5 acres, an 8-acre elementary school site, a 13.6-acre park, and 7.8 acres for major roadways. At the time the Draft EIR was being written, the Roseville City School District (RCSD) was still evaluating the need to construct an elementary school on the project site. If a school was not constructed on the site, the total number of residential units developed would be reduced by 10 units for a total of 669 units. The park site would remain, although the acreage would be reduced to 9 acres. Therefore, the Draft EIR also included an evaluation of an option without the elementary school.

Since publication of the Draft EIR, the option without the school has become the project (please see also revised Figure 3-2 in Chapter 2 of this FEIR). The school district has decided not to construct an elementary school on the project site. The total number of dwelling units has decreased to 669 units, a 9-acre park would be constructed, and the internal roadway circulation has been slightly modified. In addition, the San Juan Water District will supply raw water to be treated and conveyed to the project site by the City of Roseville. The Draft EIR analyzed both project scenarios; therefore, the analysis included in the Draft EIR is adequate and does not require any changes. Changes to the project are reflected in Chapter 2, Changes to the Draft EIR.

The Draft EIR evaluated the potential environmental effects that could result from implementation of the NRSP Phase 3. The FEIR has been prepared in conformance with the California Environmental Quality Act (CEQA), pursuant to section 15132 of the CEQA Guidelines. The Draft EIR, completed in May 2000, is hereby incorporated into this FEIR by reference. The FEIR presents substantive comments and recommendations received on the Draft EIR (see Chapter 3). It also provides responses to substantial environmental issues raised by those comments.

### Contents of the Final EIR

Responses to all substantive comments were prepared by the lead agency and its consultant in accordance with the CEQA Guidelines. Comments and responses are grouped by letter and where appropriate, responses are cross-referenced between two letters. As the subject matter of

one topic may overlap between letters, the reader must occasionally refer to more than one letter and response to collect all information on a given subject. Where this occurs, cross-references are provided.

These comments and responses, in conjunction with the Draft EIR and the text changes, constitute the FEIR, which will be considered for certification by the City of Roseville City Council. A separate Mitigation Monitoring Plan (MMP) has been prepared for the project pursuant to the California Public Resources Code (PRC) 21081.6, and appears in Appendix A of this FEIR.

The Final EIR is organized as follows:

**Chapter 1 - Introduction**

**Chapter 2 - Changes to the Draft EIR:** This chapter lists the changes to the project and the Draft EIR made either in response to comments or at the initiative of the lead agency.

**Chapter 3 - Written Comments and Responses:** This chapter contains the comment letters followed by responses to the comments. Each letter and each comment within a letter has been given a number. Responses are numbered so that they correspond to the appropriate comment. Where appropriate, responses are cross-referenced between letters.

It should be noted that none of the changes to the Draft EIR, comments received, or responses provided results in a change to the substantive conclusions of the Draft EIR.

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***2. CHANGES TO THE DRAFT EIR***

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## 2. CHANGES TO THE DRAFT EIR

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### **Introduction**

During the public comment period, a number of comment letters provided additional information on the Draft EIR. This information identified specific minor inaccuracies in the Draft EIR text or provided updated information. The additional information provided in the comment letters is contained in Chapter 3 of this Final EIR. None of the information presented or the resulting revisions to the Draft EIR resulted in a change in the substantive conclusions of the Draft EIR (i.e., identification of new significant impacts).

This section describes changes to the Draft EIR that have occurred as a result of refinements to the project since the Draft EIR was released, staff review and/or discussions with the applicant. These changes are in addition to those described in Chapter 3. None of these changes alters the substantive conclusions of the Draft EIR.

### **Changes to the Proposed Project**

The Draft EIR analyzed two versions of the proposed project; the project with an elementary school and an option without the school. Since publication of the Draft EIR, the option without the school has become the project. Therefore, the following changes are made to the proposed project. These changes do not alter the substantive conclusions of the Draft EIR because both project scenarios were analyzed.

The changes to the proposed project include:

- Decrease in the total number of residential units from 679 to 669.
- Decrease in the park acreage from 13.6 to 9.0 acres.
- No elementary school.
- Slight modification to the internal roadway system.
- San Juan Water District to supply raw water to the City of Roseville for treatment and conveyance to serve the project.

The land uses identified in Table 3-1 of the Draft EIR have been modified to omit the school site and incorporate the land use changes discussed above. The changes include:

Parcel	Land Use	Density	Zoning	Net Acres	Units
DR-1	LDR	6.4	RS-DS	9.4	60
DR-2	LDR	5.4	R1-DS	14.6	79
DR-3	LDR	4.3	R1-DS	77.2	335
DR-4	LDR	4.6	R1-DS	42	195
DR-50	Park		PR	9.0	
	ROW			7.8	
<b>TOTAL</b>				<b>160.0</b>	<b>669</b>

SOURCE: Wade Associates, August 1999.

Figure 3-2 has also been revised to reflect the change in land uses and to include the modified internal roadway system shown at the end of this chapter.

### Changes to the Draft EIR

The following corrections and clarifications are hereby incorporated into the Draft EIR. These changes are in addition to those revisions identified in Chapter 3 of this Final EIR.

#### 4.3 Biological Resources

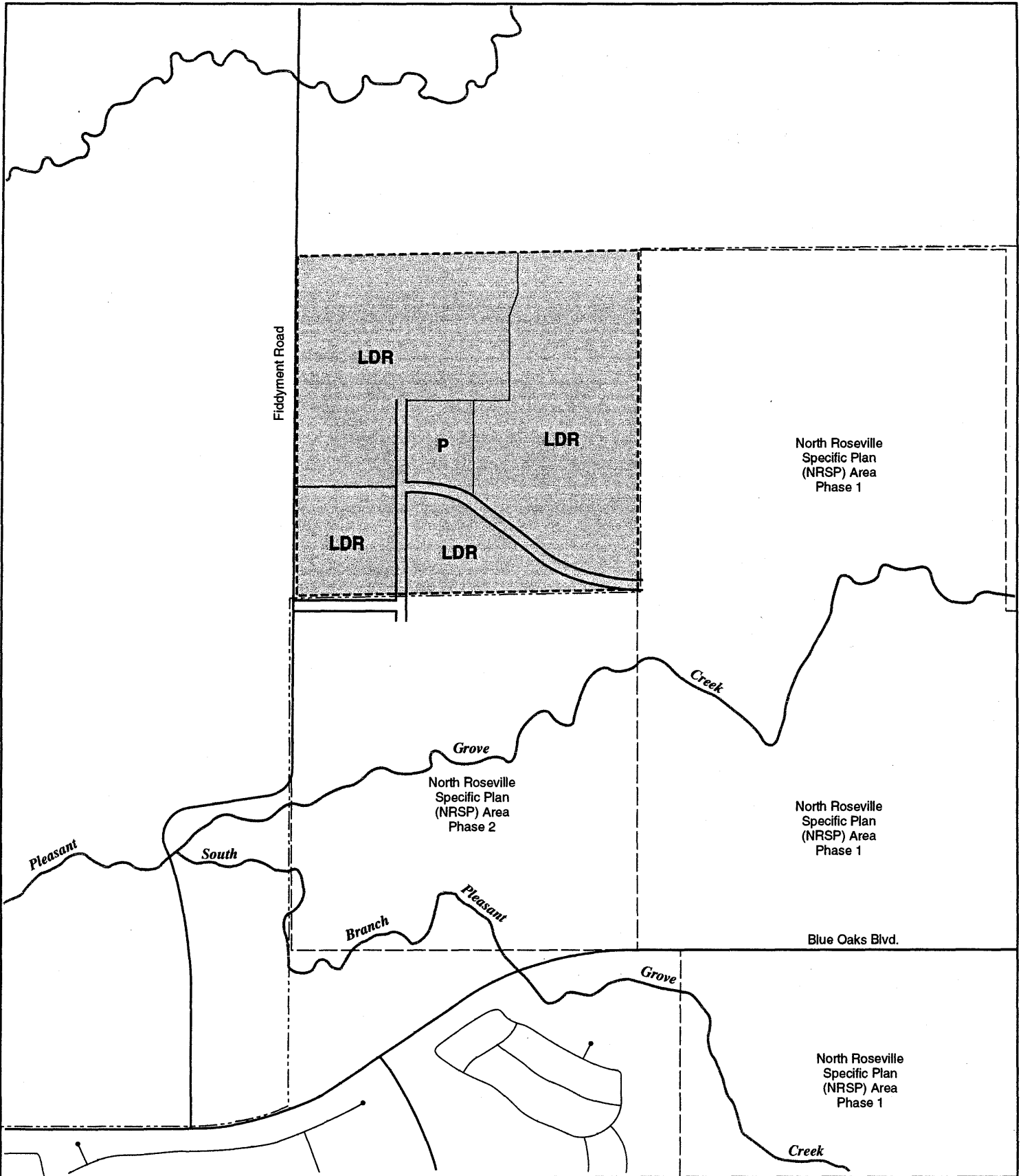
The third and fourth sentences in the 4<sup>th</sup> paragraph on page 4.3-1 are revised to read:

A total of ~~1.39~~ 0.17 acres of jurisdictional wetlands of the U.S. were identified during a survey of the project site in March 2000 ~~July 1998~~.<sup>†</sup> These include ~~0.05~~ 0.1 acre of vernal pool, ~~0.18~~ .03 acre of seasonal wetlands, and ~~1.15~~ .04 acres of drainage swales.

Table 4.3-1 on page 4.3-3 is revised to read:

Habitat	Estimated Acreage
Annual Grassland	<del>158.62</del> <u>159.83</u>
Vernal Pools	<del>0.05</del> <u>0.1</u>
Seasonal Wetlands	<del>0.18</del> <u>.03</u>
Drainage Swale	<del>1.15</del> <u>.04</u>
<b>TOTAL</b>	<b>160.0</b>

SOURCE: Sugnet and Associates, 1998.



**Land Use Designations Key**

**LDR** Low-Density Residential  
**P** Park



Project Site



Roseville City Limits



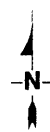
NRSP Boundaries

<sup>1</sup>School site may be eliminated based on direction from the Roseville City School District.

SOURCE: City of Roseville, *North Roseville Specific Plan*, June 1998; EIP Associates, August 2000.

0 200 400 600 800

Scale In Feet 10289-Base-Final-EIR



**Revised  
Figure 3-2**

**Proposed  
Land Use  
Designations**

The third paragraph on page 4.3-4 is revised to read:

A wetland delineation was submitted to the USCOE on March 19, 1999 and has subsequently been revised to reflect a total of 1.39 0.17 acres of jurisdictional wetlands. The USCOE verified the wetland delineation May 12, 1999 (see Appendix D).

The last paragraph on page 4.3-5 of the Draft EIR is revised to read:

Vernal Pool Fairy Shrimp (*Branchinecta lynchi*). Status: Federal threatened. Vernal pool Tadpole Shrimp (*Lepidurus packardii*). Status: Endangered. Fairy shrimp Vernal pool crustaceans are small (11 to 27 mm) crustaceans adapted to survive the annual flooding and drying of vernal pools.

The first paragraph on page 4.3-8 is revised to read:

The US Fish and Wildlife Service (USFWS) determined the vernal pool fairy shrimp to be threatened and the vernal pool tadpole shrimp to be endangered under the Federal Endangered Species Act in September 19, 1994 (59 FR 48136). Vernal pool fairy shrimp crustaceans occur commonly in vernal pools in the Roseville area, and have been found in both natural and constructed vernal pools in the vicinity of the project site.

An new paragraph is added at the top of page 4.3-8:

#### Amphibians

California Tiger Salamander (*Ambystoma californiense*). Status: Federal candidate. California tiger salamander (CTS) typically use seasonally ponded habitats for egg laying and larval development and rodent burrows in uplands for dry season refuge. CTS breed in seasonal water bodies including vernal pools, seasonal wetlands, stockponds, and ponded areas of intermittent drainages. Eggs are laid during the winter months. The critical period in larval development is late winter through early spring (March through May) when seasonal ponds begin to dry. If potential habitat is too shallow or ephemeral, larvae will die before metamorphosis to the adult stage. Although potential habitat exists within the project site, the site is located outside the known range of the species. Therefore, impacts to CTS will not be addressed.

The first and second complete sentences on page 4.3-14 under Impact 4.3-1 are revised to read:

Correspondence with the project applicant indicates that mitigation for loss of wetlands would involve the purchase of preservation credits for the 0.1 acres of vernal pools at a ratio of at least 2:1 in a USFWS-approved mitigation bank to satisfy the needs for mitigation. If this option is not acceptable to the regulatory agency at the time of project permitting, the applicant shall also dedicate at least one vernal pool creation credit for every acre of habitat directly affected. This would include create new or restore 1.39 acres of existing wetlands the 0.1 acres of vernal pools at a ratio of at least 1:1 for a total mitigation ratio of 3:1 for preservation and creation credits.

Impact 4.3-5 on page 4.3-16 is revised to read:

IMPACT 4.3-5:	Loss of <del>federally-listed-threatened</del> vernal pool <del>fairy crustacean</del> <u>habitat</u> .
SIGNIFICANCE:	Potentially significant
MITIGATION MEASURE:	Mitigation Measure 4.3-1 (Purchase credits in an approved wetland mitigation fund or other mitigation required by the 404 permit to ensure no net loss of wetlands.)
RESIDUAL SIGNIFICANCE:	Potentially significant and unavoidable.

At least one species of listed fairy shrimp ~~that is a federally-listed threatened species~~ has been observed in the project vicinity, and could be considered likely to occur in the vernal pool on the project site. No vernal pool tadpole shrimp were observed. The vernal pool fairy shrimp and vernal pool tadpole shrimp ~~is a~~ are federally listed species and the "take" of ~~this~~ these species is prohibited without specific authorization from the USFWS under Sections 7 or 10 of the Federal Endangered Species Act. ~~The wetland delineation and permitting process on for the wetland areas on the project site has been verified by the USCOE.~~

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**3. *WRITTEN COMMENTS AND RESPONSES***

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# United States Department of the

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

LETTER 1

IN REPLY REFER TO:  
PPN 2215

**RECEIVED**

June 15, 2000

JUN 16 2000

PLANNING DEPARTMENT

Laura Conti  
Roseville Planning Department  
316 Vernon Street, Suite #104  
Roseville, California 95678

Subject: Draft Environmental Impact Report for North Roseville Specific Plan Phase 3 (SCH #99061039), Roseville, Placer County, California

Dear Ms. Conti:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (DEIR) for the North Roseville Specific Plan Phase 3, dated May 3, 2000, regarding the proposal to annex a 160-acre parcel, Doctor's Ranch, to the City of Roseville, for residential development.

Our comments are intended to assist you in your review of the proposed project and will not take the place of any formal comments that may be required at a later date pursuant to the Fish and Wildlife Coordination Act (FWCA) or the Endangered Species Act of 1973, as amended (Act).

## SERVICE POLICY

Under provisions of the FWCA, the Service advises the U.S. Army Corps of Engineers (Corps) on projects involving dredging and fill activities in "waters of the United States," and special aquatic sites, which include wetlands such as those found on the proposed project site. Since the proposed project will require a Corps permit, pursuant to Section 404 of the Clean Water Act, the Service will provide comments to the Corps under FWCA authority. When reviewing U.S. Army Corps of Engineers (Corps) Public Notices, the Service generally does not object to projects meeting the following criteria:

1. They are ecologically sound;
2. The least environmentally damaging reasonable alternative is selected;
3. Every reasonable effort is made to avoid or minimize damage or loss of fish and wildlife resources and uses;
4. All important recommended means and measures have been adopted, with guaranteed implementation to satisfactorily compensate for unavoidable damage; or

5. For wetland and shallow water habitats, the proposed activity is clearly water dependent and there is a demonstrated public need.

The Service may recommend the "no project" alternative for those projects which do not meet all of the above criteria, and where there is likely to be a significant fish and wildlife resource loss.

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

1-2

**PROJECT DESCRIPTION**

This proposed project consists of annexing the 160-acre Doctor's Ranch property to the City of Roseville for residential development. The project site is located in the rapidly developing Roseville/Rocklin/Lincoln area of Placer County approximately 1.25 miles north of the intersection of Fiddymont Road and Blue Oaks Road. This parcel is bounded on the east and south by properties that are being developed as Phases 1 and 2 of the North Roseville Specific Plan, respectively. The project site, historically dry farmed but currently fallow, consists of annual grasslands (primarily non-native species) and seasonal wetlands. On the west-central portion of the property lies a grove of trees composed of the tree of heaven (*Allanthus altissima*). The site appears to support a prey base sufficient to attract various species of foraging raptors including white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), and red-tailed hawk (*Buteo jamaicensis*).

1-3

According to the DEIR, 1.39 acres of jurisdictional wetlands were verified by the Corps on May 12, 1999 (#199900252). These wetlands include 0.05 acre of vernal pool, 1.15 acres of drainage swales, and 0.19 acre of seasonal wetlands. These wetlands provide habitat for the federally listed vernal pool fairy shrimp (*Branchinecta lynchi*) and vernal pool tadpole shrimp (*Lepidurus packardii*).

1-4

**GENERAL COMMENTS**

Biological Resources

During a site visit by Service and ECORP staff on March 8, 2000, it was agreed that the original wetland delineation underestimated the size of a vernal pool located on the north end of the property. The DEIR should be revised to reflect this change through communication with ECORP staff.

1-5

The DEIR indicates that all wetlands on the project site, including vernal pools and swales, would be lost as a result of project implementation, but that mitigation through the purchase of credits would reduce the residual significance to "less than significant". The Service does not concur with this finding. First, the project applicant intends to mitigate for 1.39 acres of wetland loss through the purchase of credits in a USFWS-approved mitigation bank, or, if this option is not acceptable, would create new or restore existing wetlands at a 1:1 ratio. The Service contends that at a minimum, purchased credits should be of equivalent or higher value than the impacted habitat to compensate for direct impacts. Further, impacts to listed vernal pool invertebrates resulting from implementation of this project, as proposed, may not be adequately minimized without preservation of vernal pool habitat at a ratio of at least 2:1, and creation or restoration of vernal pool habitat at a ratio of at least 1:1.

1-6

Second, loss of wetland habitats within the City of Roseville and larger Placer County has been extensive due to rapid development in recent years. Many of these developments have failed to incorporate avoidance measures into land use plans, instead relying upon offsite mitigation measures to compensate for impacts to natural resources. This strategy has resulted in a precipitous decline in wetland, riparian, and grassland habitats and populations of federally listed species (e.g., vernal pool invertebrates) within Roseville City boundaries. Consequently, the Service cannot support projects that completely defer to offsite compensation in the absence of efforts to avoid wetland and other biological resources onsite.

1-7

The DEIR also concludes that implementation of Mitigation Measure 4.3-2 would minimize disturbance to Swainson's hawk and other legally-protected raptors to a "less than significant" level. Although the proposed mitigation may indeed reduce disturbance to nesting raptors, it does not compensate for the loss of grasslands that provide valuable foraging habitat for these species. The DEIR should specify a distinction between disturbance and foraging habitat loss, and address the residual significance of these two impacts separately.

1-8

Public Services and Utilities

The DEIR indicates that currently it remains 'unknown whether the City of Roseville, Placer County Water Agency (PCWA), or San Juan Water District (SJWD) would serve the proposed project and that determination of the water provider will be made as part of the project approval process'. Although the DEIR does describe these three water supply options, it does not evaluate the implications of each on biological resources (e.g., fisheries, groundwater, etc.). These impacts should be disclosed in the DEIR for the proposed project. Should the 160-acre Doctor's Ranch development receive water granted to the City of Roseville by a proposed Warren Act Contract, impacts to federally listed species, including vernal pool invertebrates, and their habitats should be evaluated in the Biological Assessment for this contract as well as in this DEIR.

1-9

The DEIR describes the potential water conveyance and wastewater systems that would serve the proposed project site, yet does not address any impacts associated with construction these systems. Based on Figures 4.8-2 and 4.8-3, the proposed water main and gravity wastewater lines will cross Pleasant Grove Creek, which would affect this riparian corridor. The DEIR does

1-10

not provide a wetland delineation for the lands through which these water lines would be constructed, making it impossible to rule out additional adverse effects to any wetland resources that might be located within or adjacent to the footprints of these waterlines. Because the Doctor's Ranch residential development, the water distribution system, and the wastewater collection system are interdependent, their effects on biological resources, including but not restricted to wetlands, should be addressed simultaneously and cumulatively in the DEIR.

The DEIR indicates that wastewater produced by the proposed Doctor's Ranch residential development would be processed by the Pleasant Grove Wastewater Treatment Plant (PGWTP) currently under construction. A Memorandum of Understanding (MOU) between the City of Roseville and the Service addressed projects that would be serviced by the PGWTP. In this MOU, the City and the Service sought to develop conservation strategies that would minimize take of federally listed vernal pool invertebrates related to construction of the PGWTP. The MOU included commitments to establish a process that addresses conservation issues on a comprehensive basis, rather than through piecemeal, project-by-project review. The MOU discussed the development of an interim strategy to provide a basis upon which the impacts of future development on threatened, endangered, and other species of concern will be addressed in an efficient, comprehensive manner. The interim strategy would include provisions that future development in areas adjacent to preserves shall take measures to protect and, where practicable, improve the integrity of the preserve. The interim strategy would also ensure that development projects going forward shall not preclude options for establishing a viable long-term preserve system. This approach would allow the City and the Service to develop an acceptable conservation strategy without any single project foreclosing critical conservation opportunities. The Service is concerned that the proposed Doctor's Ranch project has not been evaluated in terms of a comprehensive conservation strategy as described in the MOU. The DEIR for the project should discuss the project in the context of regional conservation planning, and include minimization measures that are appropriate in this context.

1-11

**SPECIAL STATUS SPECIES**

In the DEIR, the discussion regarding impacts to federally listed species is inconsistent and incomplete. The DEIR (Page 4.3-4, paragraph 1) indicates that both vernal pool fairy shrimp and vernal pool tadpole shrimp could potentially occur in the vernal pools on the property. These species were both federally listed on September 19, 1994 (59 FR 48136). Yet, the DEIR only discloses potential impacts to vernal pool fairy shrimp; no discussion of affects on vernal pool tadpole shrimp or explanation for excluding such information was provided. On page 4.3-3, the DEIR indicates that California tiger salamanders (*Ambystoma californiense*), currently proposed for federal listing, utilize vernal pool-grassland complexes and thus may be found on the project site. However, again, there is no discussion of potential impacts to this species or information regarding negative survey results that would warrant its exclusion. Revisions to the DEIR should address these inconsistencies and omissions.

1-12

The DEIR states that credits purchased as mitigation for impacts on vernal pools, fairy shrimp, and vernal pool plant species "shall be in direct proportion to vernal pool losses on the

1-13

property...". As mentioned above, impacts to federally listed species associated with vernal pools may not be adequately minimized at a ratio of 1:1.

**ALTERNATIVES**

The DEIR states that for the purposes of this document, Alternative 1, the No Project/No Development assumes that no development will occur on the project site and that the current agricultural designation will be retained. However, on February 10, 2000, the project applicant requested authorization from the Corps for fill of 1.39 acres of wetlands on the 160-acre Doctor's Ranch site under Nationwide Permit 26 to facilitate residential development on this parcel. Alternative 1, therefore, does not appear to guarantee that development would not occur on this parcel as proposed as an unincorporated area within Placer County. A revised DEIR should address the likelihood of development occurring should annexation not occur and disclose related impacts.

1-14

As stated above, it is the policy of the Service to support projects that represent the least environmentally damaging reasonable alternative. Among the alternatives analyzed in the DEIR other than the No Project Alternative, Alternative 2, which would provide fewer residential units and avoid a vernal pool located on the northwest corner of the property, appears to reduce the overall environmental effects. However, the DEIR provides neither an alternative that would avoid all wetlands, nor an economic analysis dismissing the feasibility of such an alternative. Given the limited vernal pool habitat remaining in the City of Roseville, the Service contends that such an alternative should be more comprehensively evaluated. Consequently, the Service must support the No project/No development Alternative as defined in this document at this time.

1-15

Thank you for the opportunity to comment on this DEIR. If you have any questions regarding these comments, please contact Danielle Chi (Wetlands Branch) at (916) 414-6586. For questions concerning special status species issues, please contact Kyle Merriam or Roberta Gerson, (Endangered Species Division) at (916) 414-6620.

Sincerely,



for

Wayne S. White  
Field Supervisor  
U.S. Department of the  
Interior Coordinator

- cc: ARD (ES), Portland, OR
- EPA, San Francisco, CA (Kathleen Dadey)
- Dir., CDFG, Sacramento, CA
- Reg. Mgr., CDFG Region IV, Fresno, CA
- Applicant

**COMMENT LETTER 1: Wayne S. White, U.S. Fish and Wildlife Service**

**Response to Comment 1-1:**

Comment noted.

**Response to Comment 1-2:**

Comment noted.

**Response to Comment 1-3:**

Comment noted.

**Response to Comment 1-4:**

Comment noted. Please see Response to Comment 1-5.

**Response to Comment 1-5:**

The project applicant's biologist re-visited the site on March 8, 2000. Based on that visit it was determined that the information provided from a site visit in July 1998 was inaccurate. Therefore, the Draft EIR is revised to include this updated information.

The third and fourth sentences in the 4<sup>th</sup> paragraph on page 4.3-1 are revised to read:

A total of ~~1.39~~ 0.17 acres of jurisdictional wetlands of the U.S. were identified during a survey of the project site in March 2000 ~~July 1998~~.<sup>†</sup> These include ~~0.05~~ 0.1 acre of vernal pool, ~~0.18~~ .03 acre of seasonal wetlands, and ~~1.15~~ .04 acres of drainage swales.

Table 4.3-1 on page 4.3-3 is revised to read:

<b>TABLE 4.3-1 EXISTING HABITAT ON THE PROJECT SITE</b>	
Habitat	Estimated Acreage
Annual Grassland	<del>158.62</del> <u>159.83</u>
Vernal Pools	<del>0.05</del> <u>0.1</u>
Seasonal Wetlands	<del>0.18</del> <u>.03</u>
Drainage Swale	<del>1.15</del> <u>.04</u>
<b>TOTAL</b>	<b>160.0</b>
<small>SOURCE: Sugnet and Associates, 1998.</small>	

The third paragraph on page 4.3-4 is revised to read:

A wetland delineation was submitted to the USCOE on March 19, 1999 and has subsequently been revised to reflect a total of 1.39 0.17 acres of jurisdictional wetlands was mapped. ~~The USCOE verified the wetland delineation May 12, 1999 (see Appendix D).~~

**Response to Comment 1-6:**

The discussion on page 4.3-14 of the Biological Resources section of the Draft EIR is revised to reflect the requirements of the USFWS.

The first and second complete sentences on page 4.3-14 under Impact 4.3-1 are revised to read:

Correspondence with the project applicant indicates that mitigation for loss of wetlands would involve the purchase of preservation credits for the 0.1 acres of vernal pools at a ratio of at least 2:1 in a USFWS-approved mitigation bank to satisfy the needs for mitigation. If this option is not acceptable to the regulatory agency at the time of project permitting, the applicant shall also dedicate at least one vernal pool creation credit for every acre of habitat directly affected. This would include create new or restore 1.39 acres of existing wetlands the 0.1 acres of vernal pools at a ratio of at least 1:1 for a total mitigation ratio of 3:1 for preservation and creation credits.

**Response to Comment 1-7:**

Comment noted. Please see Response to Comment 2-2.

**Response to Comment 1-8:**

Impact 4.3-2 on page 4.3-14 of the Biological Resources section of the Draft EIR addresses the loss of grassland habitat. Specifically, it states "the long-term loss of grassland habitat is considered a significant impact because it provides nesting and foraging habitat for a variety of animal species. Therefore, the loss of grassland habitat which supports wildlife habitat is considered a significant and unavoidable impact." Impact 4.3-6 on page 4.3-16 addresses the potential disturbance to raptors during project construction. Mitigation Measure 4.3-2 does not apply to Impact 4.3-2. The loss of grasslands is considered a significant and unavoidable impact of the project.

**Response to Comment 1-9:**

Section 4.8, of the Draft EIR, Public Services and Utilities, discusses impacts to water supply. Impact 4.8-1 on page 4.8-10 through 4.8-14 addresses potential impacts associated with the three water purveyor options. Under Option 2, the PCWA option, water could be provided to the project site under PCWA's current entitlement of 35,500 acre-feet as part of the Water Forum agreement. As discussed on page 4.8-13 of the Draft EIR, the effects of increased water diversions from the Lower American River were evaluated in the Water Forum Proposal EIR

(SCH#95082041). The Water Forum EIR identified significant and unavoidable impacts to fisheries and recreation. The project would require approximately 576 acre-feet of water annually which is within the scope of the water diversion evaluated under the Water Forum Proposal EIR, and would not create impacts more severe than those analyzed in the Water Forum EIR. If water were to be provided under Option 3, SJWD option, impacts on biological resources were also previously analyzed in the Water Forum Proposal EIR and the project's contribution would not result in more severe impacts than those addressed in the Water Forum EIR. Under either Option 2 or Option 3, the City would be the service provider for the proposed project and would contact with the respective agency to obtain the necessary water supply.

Under Option 1, City of Roseville, the amount of water the City is currently entitled to receive would not change. As discussed on page 4.8-12 of the Draft EIR, in order to provide water to the project site the City would implement an offset program. No federal facilities would be required for this offset program; therefore it is not anticipated that the City would need a Warren Act Contract.

Since publication of the Draft EIR the City and the San Juan Water District are in the process of finalizing an agreement to supply water to the project site. The San Juan Water District already has a Warren Act contact.

**Response to Comment 1-10:**

All proposed off-site utilities will connect to planned infrastructure in the North Roseville Specific Plan area. The environmental effects of constructing off-site utilities, specifically water and wastewater, has already been addressed in the NRSP EIR (SCH #96112014) and the NRSP Phase 2 SEIR (SCH # 98112063), as discussed in Chapter 3, Project Description, on page 3-13 of the Draft EIR. As discussed in the NRSP DEIR, construction of water and sewer lines and collectors constructed within the NRSP will be sited under and adjacent to planned roads. However, in some areas one or more sewer or water lines would need to cross oak woodland and riparian corridors. Pumping stations would also be constructed in the vicinity of riparian corridors. The amount of riparian habitat to be disturbed was determined to be very small. Implementation of the Section 1600 Steambed Alteration Agreement and Best Management Practices would minimize adverse impacts associated with project construction. The floodway and riparian areas within the overall plan area would be protected from vegetation removal and excessive disturbance to wildlife. These areas are designated as permanent open space with an assessment district established to perpetually maintain the area as open space. These protected areas would regenerate additional vegetation; therefore due to the small amount of riparian habitat to be disturbed by construction of water and sewer lines the impact was less than significant. The environmental impacts associated with the construction of sewer lines for the Pleasant Grove Wastewater Treatment Plant are addressed in the Pleasant Grove Wastewater Treatment Plant EIR prepared by the City of Roseville.

**Response to Comment 1-11:**

The Memorandum of Understanding (MOU) between the City of Roseville and the USFWS establishes a process to deal with land annexations and the City intends to follow this process with this project. Included within the MOU is on an interim strategy, which has yet to be defined. This site does not appear to foreclose any critical conservation opportunities considering only 0.1 acres of critical habitat exists on the site and the site is not adjacent to an existing preserve. At the time the Draft EIR was published, there were no adopted regional conservation plans within the City or County; therefore, the Draft EIR does not address the compatibility of the project with a regional conservation plan.

**Response to Comment 1-12:**

To address the comment the following revisions have been made to the Draft EIR.

The last paragraph on page 4.3-5 of the Draft EIR is revised to read:

Vernal Pool Fairy Shrimp (*Branchinecta lynchi*). Status: Federal threatened. Vernal pool Tadpole Shrimp (*Lepidurus packardii*). Status: Endangered. Fairy shrimp Vernal pool crustaceans are small (11 to 27 mm) crustaceans adapted to survive the annual flooding and drying of vernal pools.

The first paragraph on page 4.3-8 is revised to read:

The US Fish and Wildlife Service (USFWS) determined the vernal pool fairy shrimp to be threatened and the vernal pool tadpole shrimp to be endangered under the Federal Endangered Species Act in September 19, 1994 (59 FR 48136). Vernal pool fairy shrimp crustaceans occur commonly in vernal pools in the Roseville area, and have been found in both natural and constructed vernal pools in the vicinity of the project site.

An new paragraph is added at the top of page 4.3-8:

Amphibians

California Tiger Salamander (*Ambystom a calirniense*). Status: Federal candidate. California tiger salamander (CTS) typically use seasonally ponded habitats for egg laying and larval development and rodent burrows in uplands for dry season refuge. CTS breed in seasonal water bodies including vernal pools, seasonal wetlands, stockponds, and ponded areas of intermittent drainages. Eggs are laid during the winter months. The critical period in larval development is late winter through early spring (March through May) when seasonal ponds begin to dry. If potential habitat is too shallow or ephemeral, larvae will die before metamorphosis to the adult stage. Although potential habitat exists within the project site, the site is located outside the known range of the species. Therefore, impacts to CTS will not be addressed.

Impact 4.3-5 on page 4.3-16 is revised to read:

**IMPACT 4.3-5:** Loss of ~~federally-listed threatened~~ vernal pool fairy crustacean habitat.  
**SIGNIFICANCE:** Potentially significant  
**MITIGATION MEASURE:** Mitigation Measure 4.3-1 (Purchase credits in an approved wetland mitigation fund or other mitigation required by the 404 permit to ensure no net loss of wetlands.)  
**RESIDUAL SIGNIFICANCE:** Potentially significant and unavoidable.

At least one species of listed fairy shrimp ~~that is a federally-listed threatened species~~ has been observed in the project vicinity, and could be considered likely to occur in the vernal pool on the project site. No vernal pool tadpole shrimp were observed. The vernal pool fairy shrimp and vernal pool tadpole shrimp ~~is a~~ are federally listed species and the "take" of ~~this~~ these species is prohibited without specific authorization from the USFWS under Sections 7 or 10 of the Federal Endangered Species Act. ~~The wetland delineation and permitting process on for the wetland areas on the project site has been verified by the USC&OE.~~

**Response to Comment 1-13:**

Comment noted. Please see Responses to Comments 1-6 and 2-2.

**Response to Comment 1-14:**

According to the CEQA Guidelines Section 15126.6, "an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC Section 21002.1)." In addition, a "no project" alternative shall also be evaluated "to allow the decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." The No Project alternative analyzed in the Draft EIR assumes that the proposed project site would remain zoned for agricultural uses and would not be developed. According to the Guidelines if the project proposed does not involve revising an existing land use plan, but is a development project the discussion should "compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved" (Guidelines Section 15126.6(3)(B)). At this time it would be too speculative to know what type of development would occur on the site if it were to be rezoned, but not annexed. In addition, the alternatives analysis is not required to consider every conceivable alternative to a project. An analysis of the No Project alternative does not guarantee that development would not occur on this site. It is a requirement of CEQA that a No Project alternative be analyzed. Ultimately, it is within the decisionmakers discretion, in this case the Roseville City Council, to adopt an alternative in lieu of the proposed project if they feel it is warranted.

**Response to Comment 1-15:**

The Reduced Density Alternative would reduce the number of residential units to be developed resulting in a total of 53.4 acres of undeveloped open space. The vernal pool located in the northwest corner of the project site would not be developed; however, the drainage swale and seasonal wetlands would be developed under this alternative. CEQA does not require an economic analysis be prepared as part of the environmental review process. As discussed above, the Roseville City Council has the ultimate discretion to either adopt the proposed project or adopt an alternative in lieu of the project. Also, the project is subject to the requirements set forth in the 404 permits, which could include consultation with the USFWS. It is noted that the commentor supports the No Project/No Development alternative.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

LETTER 2

RECEIVED

JUN 12 2000

PLANNING DEPARTMENT

June 6, 2000

City of Roseville  
Department of Planning  
Attn: Laura Conti  
316 Vernon Street, Suite 104  
Roseville, California 95678

Subject: North Roseville Specific Plan Phase III Draft Environmental Impact Report

Dear Ms Conti:

Thank you for the opportunity to review the North Roseville Specific Plan Phase III Draft Environmental Impact Report dated May 2000. EPA has reviewed the subject DEIR, and we are providing the following comments in accordance with the Clean Water Act, particularly the Section 404(b)(1) Guidelines (40 CFR 230).

Based on our review of the DEIR, as well as our previous review of the "Doctor's Ranch" development project (U.S. Army Corps of Engineers Pre-Construction Notification Number 199900252), we cannot concur with the proposed Specific Plan modification. We urge the City of Roseville to reconsider the Specific Plan change until our concerns are fully addressed.

Project Description

The proposed project would destroy all waters of the U.S. on the project site, including 0.05 acres of vernal pools, 0.18 acres of other seasonal wetlands, and 1.15 acres of drainage swales. The vernal pools and other seasonal wetlands provide habitat for the federally listed vernal pool fairy shrimp (*Branchinecta lynchi*). Other waters of the U.S. on the project site are likely to support other wildlife use, including migratory birds, water fowl and shorebirds.

2-1

Aquatic Resources of National Importance

Vernal pools are wetlands that contain unique flora and fauna, including federally protected species. Given the extent to which wetlands and other waters in Placer County have been adversely affected by development (resulting in a net loss of waters, including wetlands), and noting the waters' importance to wildlife, including federally-listed species, we believe that additional losses to these resources should be avoided to the maximum extent practicable.

2-2

Mitigation

The proposed compensatory mitigation described in the DEIR is inadequate and provides little assurance that the proposed project will not result in both temporal and permanent net loss of wetlands, in direct opposition to both state and national goals. Further, we do not believe that the mitigation as described in the DEIR (i.e., "purchase credits in an approved wetland mitigation fund") reduces the impacts to waters of the U.S., including special aquatic sites, to less than significant.



Placer Legacy

Finally, we question whether the proposed Specific Plan amendment and associated development is consistent with the Placer Legacy project. As we understand it, Placer County has initiated the Legacy project to preserve open space in just the type of area that is proposed for development through the Specific Plan amendment. We urge the City to review the goals of Placer Legacy and coordinate with the County to ensure consistency with this emerging quality of life initiative.

2-3

In summary, we believe that significant degradation of the aquatic environment may result from the development proposed by the Specific Plan amendment. We do not believe that the DEIR adequately evaluates alternatives that would avoid waters of the U.S., particularly special aquatic sites, such as vernal pools. Moreover, minimization of impacts to waters has not been sufficiently addressed. Finally, the proposed project mitigation, as described in the DEIR, does not provide appropriate and adequate assurance that adverse impacts to waters of the U.S., even if unavoidable, would result in no net loss to wetlands.

2-4

We strongly request that you complete CEQA review through issuance of a Final EIR that addresses the issues we have detailed above. If you have any questions on this matter, please feel free to call me at 415-744-2276, or have your staff contact Ms. Kathleen Dadey at 415-744-1995.

2-5

Sincerely,

Tim Vendlinski  
Chief, Wetlands Regulatory Office

cc:

- U.S. Fish and Wildlife Service, Sacramento
- U.S. Army Corps of Engineers, Sacramento
- Central Valley RWQCB, Sacramento
- California Department of Fish and Game, Rancho Cordova
- Placer County Planning Department (Attn: Loren Clark), Auburn

**COMMENT LETTER 2: Tim Vendlinski, U.S. Environmental Protection Agency**

**Response to Comment 2-1:**

Comment noted. Please see Response to Comment 1-5 for revised text.

**Response to Comment 2-2:**

As discussed in Section 4.3, Biological Resources, of the Draft EIR, the loss of vernal pools, seasonal wetlands and other jurisdictional waters of the U.S. was determined to be a significant impact. According to a February 28, 1996, biological opinion from the U.S. Fish and Wildlife Service<sup>2</sup> to the U.S. Army Corps of Engineers on the issuance of 404 Permits, the opinion states:

"The impacts of projects that will be authorized under this biological opinion on vernal pool species will be minimized as follows:

Preservation: For every acre of habitat directly or indirectly affected, at least two vernal pool credits will be dedicated within a Service-approved ecosystem preservation bank...

Creation: For every acre of habitat directly affected, at least one vernal pool creation credit will be dedicated within a Service-approved habitat mitigation bank..."

According to the opinion, "generally the isolated pools and small complexes to be affected are expected to be less ecologically stable than pools that are part of the larger complexes in mitigation banks." Based on this opinion, the purchase of wetland credits in an approved wetland mitigation fund was deemed adequate mitigation to reduce the impact to a less-than-significant level.

**Response to Comment 2-3:**

The Placer Legacy Open Space and Agricultural Preservation Program (Placer Legacy) is an open space and agricultural preservation plan recently adopted by Placer County. At this time the Placer Legacy project is still in its development stage as it relates to funding and no acquisition areas have been identified. In addition, the City of Roseville is still considering options as to the level of participation in the program. It is understood that the program will be based on a "willing seller, willing buyer" approach. Because the County has not released maps of target acquisition areas the City is not able to review recommended acquisition areas in relation to the proposed project. In addition, as mentioned above, the City has not yet decided its level of participation in the Placer Legacy program. The City may opt for a subregional HCP or equivalent conservation plan at a future date consistent with the USFWS MOU. This project is consistent with the MOU from the standpoint that it does not preclude any critical conservation opportunities since it is not located adjacent to an existing habitat preserve and on-site resources are extremely limited.

**Response to Comment 2-4:**

The Draft EIR includes an analysis of Alternatives to the proposed project (please see Chapter 6, Alternatives). As discussed on page 6-1 of the Draft EIR, the primary intent of the alternatives, as stated in Section 15126.6(c) of the CEQA Guidelines, is to ensure that "the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." To accomplish this the alternatives analysis includes a Reduced Density Alternative, which reduces the total number of units constructed and avoids the vernal pool on the site; and an Offsite Alternative, which assumes the project is constructed in a different location. Both of these alternatives avoids developing the wetland areas on the project site resulting in no net loss of wetlands. Please see also Responses to Comments 1-15 and 2-2.

**Response to Comment 2-5:**

Comment noted. Per the CEQA Guidelines section 15089 a Final EIR has been prepared which will be distributed to all commenting agencies 10 days prior to any City action on the project.



Department of Toxic Substances Control



Edwin F. Lowry, Director  
10151 Croydon Way, Suite 3  
Sacramento, California 95827-2106

Gray Davis  
Governor

Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

June 28, 2000

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JUN 30 2000

PLANNING DEPARTMENT

Mr. Dan Dameron  
316 Vernon Street, Suite 104  
Roseville, California 95678

NORTH ROSEVILLE SPECIFIC PLAN PHASE 3 (SCH# 1999061039)

Dear Mr. Dameron:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Environmental Impact Report (EIR) for the North Roseville Specific Plan Phase 3. There are no specific details provided regarding chemical use or storage, which may have occurred due to past agricultural activities. Although DTSC does not regulate legally applied pesticides, we strongly suggest that the site be tested for environmentally persistent organophosphate pesticides such as DDT and metals before residential development occurs.

3-1

The Placer County Environmental Health Department should be made aware of all prior testing and results to determine if these values pose a threat to human health or the environment.

If you have any questions, please contact me at (916) 255-3727.

Sincerely,

Megan Cambridge, Chief  
Expedited Remedial Action Program Unit

cc: Mr. Richard Swenson, Director  
Placer County Environmental Health Department  
11454 "B" Avenue  
Auburn, California 95678

**COMMENT LETTER 3: Megan Cambridge, Department of Toxic Substances Control**

**Response to Comment 3-1:**

A discussion of past chemical usage is included in the Initial Study that was prepared for the project (see Appendix A, pages 32-34). A Phase I Environmental Site Assessment was done for the project site in 1998 by Raney Geotechnical. Based on the findings of the Phase I Site Assessment, there are no signs of chemical usage or on-site chemical storage on the project site. In addition, there are no known soil or groundwater contamination within one mile of the site. Therefore, further environmental investigation was determined not to be warranted. However, because there is always the possibility that unknown hazards could exist on the site, Mitigation Measure 5 was added which requires that if there is any evidence of soil contamination work shall stop until the area is tested, and, if necessary remediated.

STATE OF CALIFORNIA

Governor's Office of Planning and Research  
State Clearinghouse



Gray Davis  
GOVERNOR



Steve Nissen  
ACTING DIRECTOR

RECEIVED

JUL 17 2000

PLANNING DEPARTMENT

July 14, 2000

Dan Dameron  
City of Roseville  
316 Vernon Street, Suite 104  
Roseville, CA 95678

Subject: North Roseville Specific Plan Phase 3  
SCH#: 1999061039

Dear Dan Dameron:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 13, 2000, 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,

Terry Roberts  
Senior Planner, State Clearinghouse

4-1

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 1999061039  
**Project Title** North Roseville Specific Plan Phase 3  
**Lead Agency** Roseville, City of

**Type** EIR Draft EIR  
**Description** Development of 679 residential units on 160 acres. Amend the NRSP to incorporate this parcel and annex the site to the City of Roseville.

**Lead Agency Contact**

**Name** Dan Dameron  
**Agency** City of Roseville  
**Phone** (916) 774-5276 **Fax**  
**email**  
**Address** 316 Vernon Street, Suite 104  
**City** Roseville **State** CA **Zip** 95678

**Project Location**

**County** Placer  
**City** Roseville  
**Region**  
**Cross Streets** Blue Oaks Boulevard/ Fiddymont Road/ Base Line Road

<b>Parcel No.</b>	<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>

**Proximity to:**

**Highways** 80  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** Agriculture, AG-80, Commercial

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Public Services; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Population/Housing Balance; Recreation/Parks; Drainage/Absorption

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game; Region 2; Office of Historic Preservation; Department of Parks and Recreation; Reclamation Board; California Highway Patrol; Caltrans, District 3; Department of Food and Agriculture; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

**Date Received** 05/03/2000      **Start of Review** 05/03/2000      **End of Review** 07/13/2000

Note: Blanks in data fields result from insufficient information provided by lead agency.



Gray Davis  
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research  
State Clearinghouse



Steve Nissen  
ACTING DIRECTOR

**ACKNOWLEDGEMENT OF RECEIPT**

**RECEIVED**

DATE: May 19, 2000  
TO: Dan Dameron  
City of Roseville  
316 Vernon Street, Suite 104  
Roseville, CA 95678  
RE: North Roseville Specific Plan Phase 3  
SCH#: 1999061039

MAY 22 2000

PLANNING DEPARTMENT

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: May 3, 2000  
Review End Date: June 16, 2000

We have distributed your document to the following agencies and departments:

- California Highway Patrol
- Caltrans, District 3
- Department of Conservation
- Department of Fish and Game, Region 2
- Department of Food and Agriculture
- Department of Parks and Recreation
- Department of Toxic Substances Control
- Native American Heritage Commission
- Office of Historic Preservation
- Reclamation Board
- Regional Water Quality Control Bd., Region 5 (Sacramento)
- Resources Agency
- State Lands Commission

4-2

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

**COMMENT LETTER 4: Governor's Office of Planning and Research, State Clearinghouse**

**Response to Comment 4-1:**

Comment noted.

**Response to Comment 4-2:**

Comment noted.



# San Juan Water District

LETTER 5

P.O. Box 2157 • Granite Bay, California 95746 • 916.791.0115  
9935 Auburn Folsom Road • Granite Bay, California 95746  
FAX 916.791.7361 • www.sjwd.org

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MAY 17 2000

ADMINISTRATION

General Manager  
James R. English

▲  
Directors  
Kenneth H. Miller, *President*  
Dorothy Kilgore, *Vice President*  
Edward J. "Ted" Costa  
Lyle N. Hoag  
Glenn A. Miller

May 15, 2000

Ms. Laura Conti  
Project Manager  
City of Roseville  
316 Vernon Street, Suite 104  
Roseville, CA 95678

Subject: North Roseville Specific Plan Phase 3

Dear Ms. Conti:

We have received your letter requesting information regarding the water supply availability for the North Roseville Specific Plan Phase 3. As summarized in your letter, option #3, where providing water to the project site is listed as obtaining a water supply from San Juan Water District (District). Under this option, the city of Roseville would contract with the District for 576 acre-feet per year of raw water supply utilizing the District's PCWA contract.

5-1

As discussed in your referenced letter, the District is a signatory to the Water Forum, and any agreement entered into with the city of Roseville must comply with the District's Water Forum agreement. Based on the Water Forum agreement with the District, the water supply is available during years when the projected March through November unimpaired inflow to Folsom Reservoir is greater than 950,000 acre feet ("most years"). When the unimpaired inflow is less than 950,000 acre-feet, the 576 acre-feet of surface water would not be available from the District, and the city must have an alternative water supply, such as groundwater, available.

5-2

If you have any further questions, I can be reached at 916-791-4119.

Sincerely,

Shauna Lorange  
Assistant General Manager

**COMMENT LETTER 5: Shauna Lorance, San Juan Water District**

**Response to Comment 5-1:**

Consistent with the Draft EIR, the comment states that under Option 3, as discussed in Section 4.8, Public Services and Utilities, the City of Roseville would enter into a contract with the San Juan Water District (SJWD) to receive 576 acre-feet of raw water utilizing the SJWD's PCWA contract.

**Response to Comment 5-2:**

As required under Mitigation Measure 4.8-3, discussed on pages 4.8-14 and 4.8-18 in Section 4.8, Public Services and Utilities of the Draft EIR, the applicant would be required to participate in a "fair share" program to fund the use of groundwater wells to offset raw water purchase from SJWD during drier and driest years. Therefore, during those limited times when the unimpaired inflow to Folsom Reservoir is less than 950,000 acre-feet, the proposed project would use groundwater.

RECEIVED

MAY 13 2000

PLANNING DEPARTMENT



# Placer County LOCAL AGENCY FORMATION COMMISSION

175 Fulweiler Avenue, Auburn, California, 95603  
530.889.4097 FAX: 530.889.4099

DATE: May 17, 2000

TO: Laura Conti, Roseville Planning Department

FROM: Deborah Cubberley, LAFCO Executive Officer <sup>DC</sup>

SUBJECT: North Roseville Specific Plan Phase III DEIR (SCH#99061039)

LAFCO submits the following comments for consideration:

1. **CONSISTENCY WITH LAFCO GUIDELINES AND POLICIES:** On page 4.1-11 and 4.1-12 the DEIR finds “the project as proposed appears largely consistent with applicable LAFCO objectives and policies, and the impact is considered less than significant.” LAFCO staff feels that the information provided in the DEIR does not support this conclusion for the following reasons:

(a) LAFCO Policy 3a(1) specifies that vacant or underdeveloped land within the existing boundaries of a city should be considered prior to annexing new vacant land. The potential for building the proposed project within the existing city boundaries has not been satisfactorily ruled out. (See #2 below for more specific information.)

6-1

(b) LAFCO is charged with protecting agricultural and open space lands and is asked to “consider the effect of the proposal on maintaining the physical and economic integrity of the agricultural lands” (Section 56841[e] of the Government Code). The DEIR finds that the loss of agricultural is insignificant because of the “relatively low value of the property for agricultural purposes.” Unfortunately the DEIR does not appear to include quantitative data with which we may gauge the value of this property and adjacent agricultural properties under the LAFCO definition of prime agricultural land (Government Code, Section 56064).

6-2

(c) We acknowledge the alternatives analysis that includes Fiddymment Road in the proposed annexation; however, the DEIR states that the project does not propose to annex Fiddymment Road. Absent an agreement between the City and the County, such a proposal appears to be inconsistent with LAFCO Policy 1d(2). (LAFCO recognizes that it has the authority to expand an in-coming proposal to include this road.)

6-3

2. PROJECT ALTERNATIVES: Based upon direction from the Government Code and on local policy, annexation is appropriate when the site is developed to municipal levels or is about to be developed to municipal levels and alternative sites are ruled out.

The alternatives provided in the DEIR document do not satisfy LAFCO staff that all reasonable site alternatives have been identified. Alternative #3 specifies that "There are few undeveloped areas in or near the City of Roseville that are of this size and close enough to existing or planned infrastructure to make connections possible without extensions through undeveloped land, which would create new impacts rather than reduce impacts."

6-4

Infill development is almost always preferable to annexation, particularly when the loss of agricultural land is proposed and agricultural uses on adjacent land are threatened. In this case, there appears to be nothing about the project that requires that the entire development occur within a single 160 acre area. Alternative analyses should include the option of splitting the proposal between two or more sites that might together meet the objectives of the project within the existing City limits.

Secondly, the alternatives discussion apparently also automatically eliminates sites in which existing infrastructure is not immediately adjacent, claiming that the extension of such lines would necessitate going through undeveloped land. It is not specified, however, if these sites are within the existing City limits. If they are, they are probably a preferable alternative to annexation, and certainly one that should be considered.

6-5

3. COMPATIBILITY: To the north and west of the proposed development are unincorporated areas outside the City of Roseville sphere of influence. Under the county these are designated agriculture 80 acre minimum. The concern is that this project not only involves the loss agriculture on the subject parcel, but that it potentially limits agricultural uses on the adjacent lands. Although the project includes a 50 foot buffer (including roadways and backyard setbacks) and a wall, the density of the proposed development does not provide a buffer that would normally be considered compatible with agriculture.

6-6

4. SUNSET INDUSTRIAL AREA: This document apparently does not discuss how the project impacts or potentially impacts, or how it is impacted by or is potentially impacted by the Sunset Industrial Area.

6-7

5. **WATER RESOURCES:** One of LAFCO's primary responsibilities involves the logical extension of services. LAFCO must be convinced that the required services are available, that the resources are adequate, and that proposed service provider is the best option. Staff is concerned that the water issues for this proposal have not been resolved. Prior to making application to LAFCO for reorganization, the water provision issue will need to be resolved. If that resolution requires additional boundary adjustments, those boundary adjustments should be submitted as a part of that reorganization request to LAFCO.

6-8

Thank you for the opportunity to review this document.

**COMMENT LETTER 6: Deborah Cubberley, Placer County Local Agency Formation Commission****Response to Comment 6-1:**

Absorption projections prepared for the City (in compliance with LAFCO policy 3(c)(1)(a)) estimate that Roseville's supply of residential land will be exhausted by 2010. These projections take into account land uses planned not only within the City, but also elsewhere in the region. This depletion of the City's residential land use is less than 10 years away, and well within a reasonable 15 to 20 year planning horizon as recognized by LAFCO. The City has examined alternatives to meet this unmet residential demand, and promote a balance of land uses in the City and region. All lands within the existing City limits are designated within adopted land uses, which have been accounted for in the absorption projections. As a result, shifting the project to currently undeveloped residentially designated land within the City will not meet the unmet demand as these lands are all already projected to be developed by 2010. In fact, most currently undeveloped residential lands in the City have already received subdivision map approval and are entitled for development. As a result, the only way to meet the unmet residential demand within the existing City limits would be to convert currently undeveloped non-residential land (industrial, office or commercial) to residential uses. Absorption projections also show a significant long-term demand for these non-residential uses, which are all important to provide services and job growth within the City and region. In addition, residential and non-residential lands have significantly different needs/constraints for siting, such as relation to major transportation corridors, visibility, and land use adjacencies. Converting some of the remaining non-residential use in the City to residential creates potential land use compatibility issues and inconsistencies with the City's General Plan. As a result, the City has concluded that there are no vacant or undeveloped lands in the City that could accommodate the project, meet the unmet residential demand, not impact area service and job growth, not result in land use conflicts or General Plan inconsistencies and meet the objectives of the project.

Please see also Response to Comment 6-4 on CEQA requirements.

**Response to Comment 6-2:**

According to Government Code Section 56064, Prime agricultural land is defined as land which qualifies as class I or class II in the soil conservation capability classification, land which qualifies for rating 80 through 100 Storie Index Rating, land which supports livestock for the production of food or for commercial purposes, or land planted with agricultural crops.

According to the Placer County Soil Conservation Service, the soils on the project site and on adjacent properties are designated Alamo Fiddyment which has a Storie Index rating of 22 and a land use capability rating of IV w-5, and Cometa-Fiddyment which has a Storie Index rating of 34 and a land use capability rating of IV e-3.

Since 1981 the property has not been used for farming or grazing activities. Historically, cattle used the site for dry grazing, but no grazing has occurred since 1981. No fruit or nut-bearing trees, vines, bushes, or crops have been grown on the site.

Because the soils on the project site do not meet the requirements set forth in Government Code Section 56064, the site is not classified as Prime agricultural land. Therefore, as stated in the Draft EIR the conversion of the project site to developed uses is considered a less-than-significant impact.

**Response to Comment 6-3:**

The City acknowledges that the section of Fiddymment Road fronting the project would be adjacent to the City on the eastern side, and Placer County on the western side. Fiddymment Road both north and south of the project area is within and fronted on both sides by Placer County. City annexation of the section of road adjacent to the project would create a condition in which a small section of Fiddymment Road would be under City jurisdiction surrounded on both sides by sections of the road under County jurisdiction. This would be inefficient and result in maintenance and emergency service issues, and would conflict with LAFCO objectives to create logical boundaries that effect better service provision. In addition, the section of Fiddymment Road adjacent to the project does not appear to meet the criteria identified for annexation in Policy 1d(2) of the LAFCO Guidelines. Specifically, while the City is requiring the landowner to improve this section of roadway, it will not include significant new sewer, water or storm drains. Such facilities will be provided internal through the project by the City from the south and east. In addition, based on existing and future land uses, the primary users of this section of road would not be generated by the City. Traffic studies have determined that a majority of trips (road users) along this section of Fiddymment are non-Roseville trips (no trip ends within the City). As a result, annexation of Fiddymment Road adjacent to the project would appear inconsistent with LAFCO policy and the City has not proposed annexation of this section of roadway. Consistent with LAFCO policy, an annexation alternative has been included within the project EIR.

**Response to Comment 6-4:**

The alternatives analysis required by CEQA as stated in Section 15126.6(c) of the Guidelines, is to ensure that "the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." In addition, "an EIR need not consider every conceivable alternative to a project." The alternatives analyzed in the Draft EIR satisfy the requirements of CEQA and provide a reasonable range of alternatives that feasibly accomplish the basic objectives of the project and avoid or substantially lessen any significant impacts. In addition, CEQA states that "the key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." As discussed above under Response to Comment 6-1, no vacant or undeveloped parcels within the City limits were identified which could accommodate the proposed project (either in one or multiple locations). Please see also Response to Comment 6-1.

**Response to Comment 6-5:**

All potential sites within the City would be in proximity to existing infrastructure; however, none of these sites could feasibly accommodate the proposed project. Please see Responses to Comments 6-1 and 6-4.

**Response to Comment 6-6:**

To provide a buffer between the proposed project and adjacent agricultural use, the City used standards established by the Placer County General Plan. As stated in the Land Use section of the Draft EIR, a 50-foot buffer between residential structures and agricultural uses has been established. According to Table 1-4 of the Placer County General Plan, a buffer of 50 feet between rangeland/pasture and residential uses is required. Land to the north and west of the project site is currently zoned Agriculture/80-acre minimum and is used for dry farming or rangeland. The area is not used for irrigated cultivated crops. Based on the County's General Plan a 50-foot buffer is adequate to ensure compatibility between residential and agricultural uses. In addition, a six-foot high solid wood or masonry fence will be constructed along the northern and western boundary of the project site. Please see also Response to Comment 6-2.

**Response to Comment 6-7:**

The project site is immediately south of the Sunset Industrial Area Plan. As noted in Response to Comment 6-6 above, the Sunset Industrial Area Plan has designated the area immediately north of the project site as Agriculture/80 acre minimum. The project provides buffers consistent with the Placer County General Plan. It should be noted that the Sunset Industrial Area Plan identifies land designated industrial adjacent to the previously approved Phase 1 of the North Roseville Specific Plan (NRSP) just east of the proposed project. Phase 1 of the NRSP did include increased buffers adjacent to this land use consistent with the standards set forth in the Placer County General Plan.

**Response to Comment 6-8:**

Comment noted. The City is currently finalizing an agreement with the San Juan Water District to purchase raw water from the district for treatment and conveyance by the City to the proposed project site.



# PLACER COUNTY PLANNING DEPARTMENT

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

May 22, 2000

**RECEIVED**

Laura Conti  
 City of Roseville  
 Planning Department  
 316 Vernon Street, Ste. 104  
 Roseville, CA 95678

**MAY 26 2000**

**PLANNING DEPARTMENT**

**Subject: North Roseville Specific Plan Phase III Draft Environmental Impact Report**

Dear Ms. Conti:

This is in regards to the subject project and the Agreement between the City of Roseville and the County of Placer regarding development projects that affect both jurisdictions. This Agreement was signed by Placer County on April 28, 1995 and the City of Roseville on May 3, 1995 and requires both jurisdictions to work together on major land development projects in the western portion of the County.

7-1

The Agreement requires the County to consult with the City prior to circulating a draft EIR for all major land development projects within the Subject Areas. All consultations between City and County shall include, at a minimum, discussions between the Planning Directors of City and County or their designees. The City agreed to comply with the same consultation and analysis requirements regarding the impacts of City projects on the County prior to approving any major land development project located wholly or partially within any areas located west of State Highway 65 which are proposed to be annexed to the City.

7-2

The County responded to the Notice of Preparation for the subject project on May 8, 2000 and identified numerous concerns with the project proposal. In complying with the Settlement Agreement between the City and County, we request that the City Planning Director (or designee) contact this office to set up a meeting with the County Planning Director (or designee) to discuss the project's impacts and mitigation measures.

7-3

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Paul Thompson  
 Senior Planner

cc: Fred Yeager, Director of Planning  
 Chron file

**COMMENT LETTER 7: Paul Thompson, Placer County Planning Department**

**Response to Comment 7-1:**

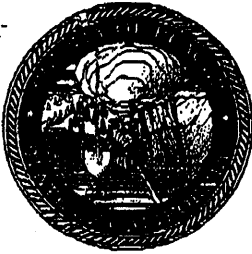
Comment noted.

**Response to Comment 7-2:**

Comment noted.

**Response to Comment 7-3:**

The proposed project was first raised for discussion with the County at the August 25, 1998 City-County Development Issues Committee. Updates on the status of the project were provided at some subsequent meetings. A Notice of Preparation was sent to several Placer County Departments for comment and input on issues to be addressed in the EIR. The City also set up a meeting on June 29, 2000 with representatives of the County's Planning and Public Works staff. The City is in the process of attempting to set up a follow-up meeting with County staff.



**PLACER COUNTY  
DEPARTMENT OF PUBLIC**

July 13, 2000

**RECEIVED  
JUL 14 2000  
PLANNING DEPARTMENT**

Ms. Colleen McDuffee, Associate Planner  
City of Roseville  
Planning Department  
316 Vernon Street, #104  
Roseville, CA 95678

**Subject: North Roseville Specific Plan Phase III – DEIR**

Dear Ms. Mc Duffee,

The Transportation Division of the Public Works Department has reviewed the DEIR for the North Roseville Specific Plan Phase III and request the following comments be addressed in the Final EIR.

**Fiddymment Road Annexation**

If this project is approved, we recommend approval of Alternative #4, which includes annexation of Fiddymment Road by the City. This project, along with North Roseville Specific Plan Phase II and the Del Webb project, has continued the encroachment of urbanized land directly up to the City/County jurisdictional boundary, providing direct access onto Fiddymment Road. This continued expansion by City development should include the annexation of Fiddymment Road itself.

8-1

The current pavement condition of Fiddymment Road has resulted in the County placing weight restrictions on this roadway. However, the long-range plan is to designate Fiddymment Road as a truck route to facilitate truck traffic to/from the land fill and Materials Recovery Facility adjacent to the Fiddymment Road/Athens Avenue intersection.

8-2

In the long-term we expect substantial increases in truck traffic and traffic-related noise along the Fiddymment corridor. While the Plan identifies 35-foot setbacks from Fiddymment Road and the need for 6-foot sound barriers along the Fiddymment Road frontage, this may not provide sufficient noise attenuation for the future residents whose homes will back on to Fiddymment Road. We anticipate receiving many noise complaints from those residents of this project adjacent to Fiddymment Road. It seems appropriate that the jurisdiction approving residential development adjacent to a roadway should be the one responsible for dealing with roadway issues resulting from such development. Thus, annexation of Fiddymment Road by the City is the appropriate action if the project is approved.

8-3

**Ms. Colleen McDuffee, Associate Planner**  
Subject: North Roseville Specific Plan Phase III  
July 13, 2000  
Page 2

When Del Webb was approved, the City improved Fiddymment Road along the project's frontage to 1/2 of a future 4-lane roadway and annexed to the future centerline. We would like to have the City implement the same standard with this project.

8-4

**Fiddymment Road Impacts**

We do not agree that Impact 4.5-6 is less than significant as it relates to safety conflicts on Fiddymment Road. The segment of Fiddymment Road between this project and Blue Oaks Boulevard consists of narrow travel lanes with little to no shoulders. The expansion of urban development associated with this project will increase potential conflicts between automobiles, pedestrians and bicyclists. We would like to see measures implemented with this project that would reduce or eliminate these conflicts. Widening the roadway to expand the travel lane and shoulder width would be appropriate to accommodate the increased usage of Fiddymment Road created by the development of this project.

8-5

Please don't hesitate to contact me at (530) 889-7581 if you have any questions.

Sincerely,

County of Placer  
Department of Public Works



William J. Moore, P.E.  
Associate Engineer

**COMMENT LETTER 8: William J. Moore, Placer County Department of Public Works**

**Response to Comment 8-1:**

Comment noted. Please see also Response to Comment 6-3.

**Response to Comment 8-2:**

Comment noted. The project Development Agreement includes a disclosure requirement to subsequent purchasers that Fiddymment Road is being designated as a truck route.

**Response to Comment 8-3:**

As discussed in Section 4.7, Noise, in the Draft EIR on page 4.7-15 development within the project site is predicted to generate noise level increases of well below 3 dB. Therefore, the impact was determined to be less than significant. Under cumulative conditions, traffic noise levels within the project site would exceed 60 dB associated with an increase in traffic. Because a specific design for internal roadways and residences was not available for review setbacks and/or noise barriers are presented in Mitigation Measure 4.7-1. Compliance with this mitigation measure also requires a site-specific noise analysis be conducted for each roadway segment that would generate noise levels in the project site that exceed city noise standards. This includes Fiddymment Road.

**Response to Comment 8-4:**

The project is required to construct ½ of a future 4-lane roadway and other frontage improvements. Please see Response to Comment 6-3.

**Response to Comment 8-5:**

As shown on Figure 4.5-7 of the Draft EIR, the proposed project would increase traffic on Fiddymment Road north of Blue Oaks Boulevard from 5,700 to 6,100 vehicles along the northern leg and from 3,100 to 3,600 vehicles along the southern leg. This results in an increase of 900 vehicles. The proposed project is required to improve Fiddymment Road along its frontage. This will include two travel lanes, bike lanes and a sidewalk. The section of Fiddymment Road between Blue Oaks Boulevard and the southern project boundary is outside the project boundaries and within Placer County's jurisdiction. Phase 2 of the NRSP is obligated to contribute \$300,000 for future improvements to Fiddymment Road along either the existing alignment or along a new alignment yet to be approved. In either case, these improvements would conform to County standards including a paved shoulder for bike and pedestrian traffic.



SUTTER COUNTY  
COMMUNITY SERVICES DEPARTMENT

Animal Control  
Building Inspection  
Emergency Services  
Environmental Health  
Fire Services  
Planning

RECEIVED

JUN 14 2000

Rich Hall, Director  
Larry Bagley, Assistant Director,  
Permitting Services  
Chuck Vanevenhoven,  
Fire Services  
Mike Harrold,  
Emergency Services

PLANNING DEPARTMENT

June 13, 2000

City of Roseville  
Planning Department  
Attn: Laura Conti  
316 Vernon Street, No. 104  
Roseville, CA 95678

Re: North Roseville Specific Plan Phase III; Draft Environmental Impact Report (DEIR);  
(SCH #99061039)

Dear Ms. Conti:

Sutter County thanks you for the opportunity to review and comment on the DEIR. After reviewing the DEIR, we believe the document inadequately addresses several ongoing Sutter County concerns, which have been expressed to the City of Roseville on other projects. Of particular interest to Sutter County are hydrology issues such as groundwater recharge, stormwater runoff, and increases in off-site flood elevations as well as traffic impacts on Sutter County. The DEIR states that a number of identified project impacts were found to be less than significant, requiring no mitigation; however, these impacts include increases in the rate of stormwater runoff, increases in on-site and off-site flood elevations, and increases in traffic volumes in Sutter County. At this time, the DEIR does not mitigate these impacts to a less than significant level.

1. Impacts dismissed as insignificant in the Initial Study and Environmental Checklist include the effect of the project on groundwater recharge. One of the purposes of an EIR is to identify potentially significant impacts and present evidence as to whether such impacts are significant and whether they can be mitigated. The groundwater recharge issue is dismissed in the Initial Study with the comment that the soil types in the area are "relatively impermeable" and, therefore, the creation of impervious services by development will not affect groundwater recharge potential. Presently, the DEIR contains no support for this assertion. In order to produce an adequate document, the DEIR must quantify the amount of lost recharge potential and provide mitigation.

9-1

2. Section 4.2 Flooding and Drainage notes the project site is located within the Pleasant Grove Creek watershed. The south branch of the Pleasant Grove Creek is located southwest of the project site. The south branch flows through the southern part of neighborhood C [of the project] and joins Pleasant Grove Creek about one-fourth mile west of neighborhood C. Pleasant Grove Creek continues in a westerly direction and flows into Pleasant Grove Creek Canal, approximately 7 miles downstream of the city limits. The Pleasant Grove Creek Canal flows into the Cross Canal in Sutter County and into the Sacramento River just south of its confluence with the Feather River, approximately 14 miles west of Roseville. (DEIR p. 4.2-1.) The DEIR states the proposed project

9-2

would increase the amount of impervious surface which would increase the volume of surface runoff entering Pleasant Grove Creek and its tributaries. Increased flows and altered drainage patterns could increase the potential for localized and regional flooding on-site and upstream and downstream of the project area. (DEIR p. 4.2-10.) If the proposed project substantially increases the volume of runoff in Pleasant Grove Creek, downstream areas including Sutter County would experience more severe flooding. The DEIR states:

"A study prepared in 1993 concluded that all planned future development in Placer County, if unmitigated, could increase flows by less than 0.3 foot along tributary streams and approximately 0.1 foot in the ponding area upstream of the Cross Canal. These increases would inundate several hundred additional acres in Sutter County during a major flood. However, the proposed project would contribute only a small portion to these increases in flood elevation."

(DEIR p. 4.2-10, emphasis added.) This type of analysis is improper and subverts the purpose of an EIR. One may not simply minimize and dismiss an impact because it is a part of similar impacts caused by other development in Roseville and western Placer County. This is the exact reason that a cumulative impact analysis is required by CEQA. However, an examination of the cumulative impacts analysis under "Exacerbated Flood Conditions" finds it to be vacuous of meaningful content. (DEIR p. 5-4.) The analysis amounts to a statement that increased development will raise the rate and amount of runoff and that this will exacerbate flooding conditions. No facts are presented and no analysis is presented as to the nature and amount of the cumulative total of such runoff. Rather than provide the appropriate facts and analysis, the DEIR opines that Roseville has developed a reasonable flood control strategy. It is asserted that this strategy includes provision for construction of a regional stormwater retention facility which would mitigate for increased volumes of stormwater. It is also stated that the size of the retention facility and amount of fees to be paid by the developer will be determined by the Drainage Master Plan that is currently being prepared. The DEIR notes that other flood control measures include project specific flood controls, purchasing flood easements, floodproofing structures, or providing insurance to at-risk property owners. Further, the city may use its fees to participate in those strategies rather than construct a city retention facility. These statements do not constitute mitigation of flood impacts on Sutter County. Mitigation cannot be adequately provided until proper evidence is presented showing the extent of needed mitigation. The facts that the city has a drainage master plan which may be completed some time in the future, that this master plan may provide some kind of mitigation, that some retention or detention facilities may be built, and that fees may be used toward other methods of mitigation are not mitigation. Mitigation under the law must be definite, specific, and enforceable.

Further, the city may not rely on a 1993 study without showing that the predictions and assumptions used in the study ("*Placer County Flood Control and Water Conservation District, Auburn Ravine, Coon, and Pleasant Grove Creeks Flood Mitigation, June 1993*") conform to year 2000 reality. Moreover, the DEIR may not state that several hundred additional acres will be flooded in Sutter County without examining the impact of such flooding.

The DEIR fails to provide mitigation for stormwater runoff or the increase in on-site and off-site flood elevations by its failure to ensure that a formal program is in place that will actually accomplish the needed mitigation. The DEIR fails to demonstrate that flooding and stormwater runoffs are not a significant effect on Sutter County. Although the DEIR makes some attempts at discussing indefinite future mitigation, it contains no formal plan and no mitigation-monitoring program.

The DEIR further states that project design must conform to the Placer County Flood Control District Stormwater Management Plan. (DEIR p. 4.2-6.) This plan requires that all development maintain 90% of pre-project flows. However, the DEIR states that there will be an increase of 33% average runoff for a 10-year storm over existing conditions and for a 100-year storm runoff would increase by 23% over existing conditions. Thus, the DEIR does not conform to the requirements of the stormwater management plan and utterly fails to show how this impact is not significant. (DEIR, pp. 4.2-8-4.2-10.) It is also stated that peak flow rates would be "slightly reduced" due to changes in runoff "timing." However, the DEIR fails to show how this timing would be accomplished or how it would be enforced. Moreover, the DEIR fails to deal with mitigation for lands that will be subject to high water for longer periods of time.

9-2  
cont'

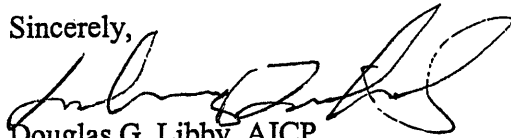
3. Under impact 4.5-5 (DEIR p. 4.5-35), the DEIR states the proposed project would increase traffic volumes on Sutter County roadways. The DEIR concludes that the effect is less than significant and no mitigation is required. The DEIR asserts that Riego Road, Sunset West/Howsley Road, and Catlett Road would continue to operate at LOS "A" levels at buildout of the project. However, this assertion is based on predictions of future events for which there is no guarantee. The DEIR states that the 1999 MTP calls for Baseline Road to be widened to four lanes and that Riego Road would have four lanes from the Placer County line to SR 70/99. However, the DEIR notes that if Riego Road is not widened to four lanes, it would operate at a LOS "F" level under 2015 market conditions. The MTP also calls for construction of an interchange at Riego Road and SR 70/99. Without this interchange, or major at-grade improvements, the intersection of Riego Road and SR 70/99 would operate at an LOS "F" level under 2015 market conditions. Making assumptions about the future does not constitute mitigation and is no basis from which to determine that there is no significant impact. Without a four-lane Baseline Road, a four-lane Riego Road, and a Riego Road and SR 70/99 interchange traffic in Sutter County will operate at a LOS "F" level. Hoping that road improvements will be made does not reduce the impact to a less than significant level.

9-3

All of the topics discussed above remain of paramount concern to Sutter County. The DEIR does not reduce the potential impacts identified above through mitigation to levels which are less than significant. For these reasons, the DEIR is not a sufficient information document for the public and decision-makers and should not be adopted until these issues are properly addressed and mitigated.

9-4

Sincerely,

  
Douglas G. Libby, AICP  
Associate Planner

DL:gsg

**COMMENT LETTER 9: Douglas G. Libby, Sutter County Community Services Department****Response to Comment 9-1:**

The proposed project is located in the Sacramento Valley groundwater basin. Groundwater basins are recharged naturally by infiltration of streamflow that originates in the mountain areas contiguous to the basin and by deep percolation of precipitation. These sources are considered the major contributor to groundwater replenishment. Only lands with sufficiently permeable soil permit percolation. As described on page 23 of the Initial Study (located in Appendix A), near-surface soils in the project area consist of moderately dense to dense, silty, fine to medium sand, which is underlain by cemented clayey to silty, fine to coarse sand. Underlying the cemented soil strata to a depth of about 35 feet are interbedded layers of hard silt, sandy silt, clayey silt, and silty clay. These soil types are relatively impermeable. Therefore, as discussed on page 23 of the Initial Study, the proposed project's impact on groundwater recharge was determined not to be significant because underlying soils limit groundwater recharge under undeveloped conditions, and the addition of impervious surface cover as a result of project development would not significantly alter recharge potential.

The potential reduction in groundwater recharge to the Sacramento Valley groundwater basin as a result of project development would not represent a significant reduction in total recharge, because according to U.S. Geologic Survey (U.S.G.S.) computer models, natural recharge from Placer County as a whole represents less than two percent to the total recharge in the basin<sup>3</sup>, and the project site constitutes only a small portion of that quantity. Therefore, in the professional opinion of the EIR authors, sufficient data exist, including data from a U.S.G.S. computer model, to determine the magnitude of the impact and quantification would not change the results or conclusions of the Draft EIR.

**Response to Comment 9-2:**

The information summarized from the 1993 study (*Auburn Ravine, Coon, and Pleasant Grove Creeks Flood Mitigation*, prepared for Placer County Flood Control and Water Conservation District by CH2M Hill) regarding stormwater flows attributable to future planned development in Placer County and potential downstream effects in Sutter County provided in the impact discussion (DEIR, page 4.2-10) was intended to provide an overall context regarding regional drainage. Site-specific estimates of stormwater runoff attributable to the proposed project were prepared as part of this DEIR. The source of the data is Baker-Williams Engineering Group, September 1999, as indicated at the bottom of Table 4.2-3. The discussion on page 4.2-10 in the DEIR explains that previous hydrologic studies addressing development in the Pleasant Grove Creek watershed were prepared in 1994 and 1996 for North Roseville Specific Plan (NRSP) development. These studies assumed full buildout of the NRSP. The applicant's engineer, who evaluated the results of the site-specific runoff estimates in combination with these studies, concluded runoff generated as a result of development of Neighborhood E would not alter the previous recommendations for managing stormwater runoff from NRSP development. (It should be noted that Neighborhood C is not part of the proposed project, but is located south of the

proposed project.) The analysis of project-specific effects on pages 4.2-8 through 4.2-11 does not rely on the 1993 study, as suggested by the commentor.

It is correct the proposed project drainage design must conform to the Placer County Flood Control and Water Conservation District (PCFCWCD) Stormwater Management Manual (not "Plan," as stated by the commentor). The PCFCWCD Stormwater Management Manual (SWMM), adopted in 1994, specifically directs *when* [emphasis added] storage is to be used to mitigate downstream impacts due to increased flows generated by development of a site, the objective flow shall be taken as the estimated pre-development peak flow rate less 10 percent of the difference between the estimated pre-development and post-development peak flow rates from the site for all standard design storms ranging from the 2-year and up to and including 100-year. In no case, however, shall the objective flow be less than 90 percent of the estimated pre-development flow.<sup>4</sup> The SWMM does not require that *"all* [emphasis added] development maintain 90 percent of pre-project flows," as the commentor asserts.

The City of Roseville coordinates regularly with the PCFCWCD regarding drainage issues in western Placer County. The PCFCWCD has formally commented on drainage effects related to North Roseville Specific Plan development. In a letter to the City of Roseville dated June 30, 1997, the PCFCWCD stated:

We have reviewed the hydrologic analysis by CH2M Hill for the North Roseville Specific Plan [NRSP] dated February 4, 1997. In general, our policy generally recommends detention to mitigate increases in downstream peak flows in this watershed. We have concluded, however, that this project [NRSP] is so located in the Pleasant Grove Creek watershed that detention for the project would more likely add to downstream peak flows than not under reasonably foreseeable conditions, and, further, the project [NRSP] would have little impact on localized flooding. The [NRSP] EIR needs to make this distinction because: a) the offsite rate of runoff will increase for most development projects in the Pleasant Grove Creek watershed including this one [NRSP], with mitigation, [and] b) the resulting increase from a particular project may be perceived as small in relationship to total watershed flow, but the cumulative impact of all developments is likely to be significant.

As noted by the commentor and as shown in Table 4.2-3 in the DEIR, the proposed project would increase runoff over existing conditions. Although runoff would increase, consistent with the PCFCWCD conclusions cited above and site-specific evaluation, the description of runoff effects and the rationale for not recommending detention for the proposed project is correctly described on page 4.2-10 in the DEIR. Thus, the conclusion that increased peak flows would be less than significant is supported by substantial evidence, and mitigation is not necessary. Moreover, as stated on page 3-13 in the Project Description in the DEIR, necessary storm drainage management for the proposed project would be implemented through a Development Agreement, which includes conditions related to the provision of infrastructure improvements and financial obligations. Item 3.5.1 of the Development Agreement requires that a Master Drainage Plan be developed for the project that identifies the size, location, and timing of all major drainage facilities. Items 3.5.1 and 3.5.2 require that the drainage plan be prepared to the satisfaction of the City of Roseville City Engineer and other agencies having jurisdiction over drainage (in this case, the PCFCWCD).

As noted above, the DEIR does not rely on the 1993 study for the analysis of project effects. The DEIR (page 4.2-10) merely reiterates the conclusions of the study that the inundation of several hundred additional acres in Sutter County could occur as a result all planned future development in Placer County. It is not necessary nor required, for purposes of this DEIR, to update the 1993 analysis to "conform to year 2000 reality" or to analyze the impact of several hundred of acres of flooding in Sutter County because the proposed project would not in and of itself cause several hundred acres of flooding. The proposed project would, however, incrementally contribute to that effect, as discussed in the cumulative analysis on page 5-4 in the DEIR.

As stated on page 5-4 in the DEIR, the City has developed a regional flood control strategy, which includes provisions for construction of a regional stormwater retention facility to mitigate for increased amounts of stormwater. The regional facility would be funded by new development through the payment of fees based on each projects contribution to increase in runoff. While a specific location has not been identified, there is adequate, vacant land in the City and surrounding area to accommodate a retention facility. The City believes a retention facility is a reasonable, feasible option for addressing the City's contribution to runoff volumes, including that generated by the proposed project. Nonetheless, as discussed on pages 5-4 through 5-5 in the DEIR, while storage of project flows in a regional retention facility would reduce the project's contributions to regional flooding and would serve to reduce the magnitude of the project's cumulative effect, the City of Roseville could not and is not obligated to fully mitigate the cumulative effects of increased flows for the entire region. Therefore, as stated on page 5-5 in the DEIR, the cumulative impact remains significant and unavoidable.

It should be noted that the City of Roseville and Sutter County have met on a number of occasions over the previous years to discuss alternative flood control strategies. In these meetings, Sutter County has expressed interest in exploring alternatives to a retention facility to mitigate Roseville's share of regional runoff. To date, no formal alternatives have been identified by Sutter County. As a result, the City continues to move forward planning a retention facility to mitigate its share of regional impacts.

As indicated on page 3-12 in the Project Description in the DEIR, the project applicant would be required to contribute toward a regional flood control strategy as a condition of project development. As such, additional mitigation for the project's contribution to cumulative effects is not necessary. The commentor's concern regarding strategies to mitigate City-wide effects on downstream flooding and the mechanism to implement them is noted and will be forwarded to the City Council for their consideration during the decision-making process.

#### **Response to Comment 9-3:**

The impact discussion under Impact 4.5-5 on page 4.5-35 through 4.5-36 of the Draft EIR, states that the analysis of impacts on Sutter County roadways involved a comparison of 2015 traffic volumes with and without the proposed project. As discussed on page 4.5-35, the 1999 MTP intends to widen Baseline Road and Riego Road and construct an interchange, or major at-grade improvements at the intersection of Riego Road and SR 70/99. With these improvements the level of service is anticipated to be "C" or better under 2015 conditions. If Riego Road is not

widened the level of service would be "F" with or without the proposed project. The same is true for the interchange at SR 70/99. If the MTP traffic improvements are not constructed, the level of service in 2015 is anticipated to be "F" with or without the project. Because the project would not significantly increase traffic volumes along these roadways and the level of service would remain unacceptable with or without the project the project's contribution is not considered significant. It is not the sole responsibility of this project to mitigate for a regional traffic issue.

**Response to Comment 9-4:**

For the reasons stated above, it is the City's position that the EIR provides adequate analysis of the issues identified.

/E

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TMENT



**Roseville Joir**

<http://www.rjuhsd.k>

Facilities Development & Technology Department  
Denny Jones, Director

1750 Cirby Way, Roseville, CA 95661  
(916) 782-4707, Ext. 2351  
(916) 782-4030 FAX  
E-Mail: [djones@rjuhsd.k12.ca.us](mailto:djones@rjuhsd.k12.ca.us)

ALLAN CAMERON  
JAMES JOINER  
GARY A. KIDDER, Jr  
R. JAN PINNEY

July 10, 2000

Laura Conti  
City of Roseville Planning Department  
316 Vernon Street, Suite 104  
Roseville, CA 95678

**SUBJECT: NORTH ROSEVILLE SPECIFIC PLAN PHASE 3  
DRAFT ENVIRONMENTAL IMPACT REPORT**

Dear Ms. Conti:

Thank you for the opportunity to comment on the subject Draft EIR.

The proposed project is currently located within the Roseville High School attendance boundary. Beginning in the Fall, 2000, projected enrollment at Roseville High School will exceed its capacity. Due to this impacted status, the district is currently pursuing alternatives for housing students, which could include changes to attendance boundaries, construction of additional capacity at Roseville High School, and/or construction of a new 6<sup>th</sup> comprehensive high school. The district is in the planning stages of the 5<sup>th</sup> comprehensive high school to be located in Antelope, CA. It is unlikely that students generated from the proposed development would attend the 5<sup>th</sup> comprehensive high school.

10-1

The district requests that the City place the developer on notice that the district is currently in negotiation for purchase of a 45 acre school site located on the Fiddymnt Ranch, west of Fiddymnt Road. If acquired, this site would be developed for the 6<sup>th</sup> comprehensive high school, which may serve students generated from the subject development.

10-2

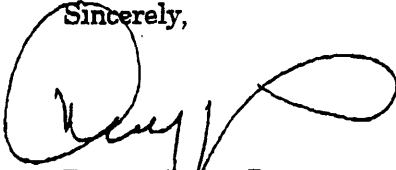
Laura Conti  
July 10, 2000  
Page 2

The district and the project proponent have come to agreement on the payment of school impact mitigation fees, which fully mitigates any impact the project may have on the district.

10-3

If you have any questions, please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Denny Jones", with a large, stylized flourish extending to the right.

Denny Jones, Director  
Facilities Development & Technology

Cc: Martin Steiner  
Hefner, Stark & Marois  
2710 Gateway Oaks Dr.  
Suite 300 South  
Sacramento, CA 95833-3502

**COMMENT LETTER 10: Denny Jones, Roseville Unified School District**

**Response to Comment 10-1:**

Comment noted.

**Response to Comment 10-2:**

Comment noted.

**Response to Comment 10-3:**

Comment noted.

# DIAMOND CREEK

LETTER 11

P A R T N E R S, L T D

**RECEIVED**

JUN 02 2000

SENT VIA FAX AND DELIVERY **PLANNING DEPARTMENT**

June 1, 2000

Dan Dameron  
Laura Conti  
Planning Department  
City of Roseville  
316 Vernon Street  
Roseville, CA 95678

**Re: Doctors Ranch Parcel**

Dear Dan and Laura:

Thank you for the opportunity to comment on the Doctors Ranch EIR. As you know, when I previously requested the Specific Plan, it was not available and I would request that the comment time for the EIR run from the date we received the Specific Plan, which was May 31. The reason for my request is, as you know from our previous discussion, it is rather difficult to understand the traffic and the impacts without having the availability of the Specific Plan.

11-1

What follows are my initial comments without yet having reviewed the Specific Plan in order to hopefully keep things moving forward in a timely fashion. We will also continue talking with Tim Taron who represents Mourier with the belief that based on past experience, we can continue to work successfully with the applicant on modifications that are in the best interest of the entire area. By copy of this letter to Tim Taron, I hope to begin work on these issues and, again, will provide a more comprehensive list after I have reviewed the Specific Plan. Enclosed is a letter from Steve Brown with Fehr & Peers regarding traffic issues. In brief, the current alignment creates problems throughout Diamond Creek that we believe are correctable. However, the information necessary is not currently present in the EIR. Mr. Brown's letter requests a couple alternate traffic analyses. In addition, the EIR does not analyze the trips on Parkside Way between Opal and Northpark. Homes front along this stretch of road and it is important that trips do not exceed 2000 cars per day in order to maintain the concept and intent of the Specific Plan. While I think different street patterns that significantly diminish any thru-traffic to Diamond Creek are possible, I think a larger issue should be explored as well.

11-2

Dan Dameron  
Laura Conti  
Page 2  
June 1, 2000

If the density per acre from the proposed project is compared to the adjacent densities in Diamond Creek, you will note that the densities are significantly greater. As other developments seek to annex into Roseville, I am very concerned that we set a precedent that such annexations would potentially be at densities equivalent to this proposal. Since Mourier also owns the 160 acres directly to the south, there is an opportunity to gather his high-density units along Blue Oaks Boulevard and maintain lower densities north of the creek. The 160 acres is not yet under development, therefore, this is a very viable option that could in fact be explored. The types of neighborhoods that develop north of the creek would then be more compatible with those developing now in Diamond Creek.

11-3

Besides the density issue and its effect on neighborhoods, another element is the quality of streetscape and other infrastructure improvements that are visible. Within Diamond Creek, we have successfully introduced a decorative streetlight, decorative bridges, a round-a-bout, and other items without significantly impacting the budget as a percentage of total project costs. In other words, when an individual living within Diamond Creek pays their Mello-Roos payment, they effectively are able to see and experience some of these improvements at a level that they can appreciate for a less than 5-7% increase in their total payment. While all of the improvements are important (i.e., water, sewer, roads) somehow it is ironic that without the decorative items, the ultimate homeowners don't see and experience the infrastructure paid for by the Mello-Roos payment without these decorative additions.

11-4

In regard to schools, with the addition of Doctors Ranch parcel, if all the students north of Blue Oaks attend the Diamond Creek Elementary School, that school would be overcrowded. I don't believe the applicant or anyone involved with the approval process is interested in having overcrowded schools, therefore solutions to this problem need to be discussed. Our main interest here is that we want to be certain that all the children within Diamond Creek can attend Diamond Creek Elementary School and that that school will not be overcrowded, even without the addition of "portable" structures. Unfortunately, the Specific Plan arrived while I was out of the country and therefore this letter comes to you dictated and not read without the benefit of having read the Specific Plan. If some of these issues have been addressed, I am appreciative of the foresight that caused that to occur; however, if on the other hand these issues have not been dealt with, then hopefully this provides some discussion for further study.

11-5

In closing, I feel it is very important that the other "stake holders" are solicited for their comments once this information is available. In the past, the Planning Department has been very proactive in scheduling and organizing such meetings but it seems lately we have moved away from this type of format. As an applicant and developer in Roseville for over 11 years, while I found these meetings typically delayed entitlements a bit, I also

11-6

Dan Dameron  
Laura Conti  
Page 3  
June 1, 2000

found that the ultimate design was enriched from the participation. In today's market, all developers in Roseville have zoned property to keep us busy and so it is my hope that no one will object to these types of stake holder meetings becoming part of the normal approval process where appropriate for major rezone application. Clearly, this project qualifies as a "major rezone" application, and especially given the traffic impacts as well as precedent-setting densities, it certainly deserves this kind of review. Thank you once again for the opportunity to comment. I look forward to visiting with you upon my return.

Best regards,

Diamond Creek Partners, LTD.,  
a California limited partnership

**Dictated  
But Not Read**

Stephen L. Des Jardins  
Chief Financial Officer of Diamond Equities, Inc.,  
general partner of Diamond Equities 360

SLD/jb  
Enclosure

cc: Steve Schnable, *John Mourier Construction*  
Tim Taron, *Hefner, Stark & Marois*  
Mike Anderson, *Meritage Homes* (adjacent homebuilder)  
Brian Bombeck, *U.S. Home Corporation* (adjacent homebuilder)  
Scott Hoisington, *Woodside Homes* (adjacent homebuilder)  
Jack Hood, *Centex Homes* (adjacent homebuilder)  
Jack Davidson, *John Laing Homes* (adjacent homebuilder)  
Connie Batterson, *Eskaton* (adjacent project)  
Steve Brown, *Fehr & Peers*  
Bob Anders, *Diamond Creek Partners, LTD.*



FEHR & PEERS ASSOCIATES, INC.  
*Transportation Consultants*

2990 Lava Ridge Court, Suite 200  
Roseville, CA 95661

916 773-1900 • Fax 916 773-2015  
fehrandpeers.com

May 23, 2000

Mr. Stephen DesJardins  
Diamond Creek Partners  
1570 Parkside Way  
Roseville, CA 95747

Re: DEIR for North Roseville Specific Plan, Phase 3

Dear Stephen:

I reviewed the DEIR for Phase 3 of the North Roseville Specific Plan, and I have some concerns regarding the level of traffic projected for Opal Drive in the Diamond Creek property. This letter documents the problem, identifies potential remedies, and recommends an approach.

#### **Problem**

Opal Drive and Parkside Way (north of Opal Drive) were designed as residential streets that could accommodate front-on lots. The daily traffic levels on these streets were previously predicted to be less than 2,500 vehicles per day, which is the threshold of acceptability used for planning residential streets with fronting homes.

According to figures on pages 4.5-27 and 5-9, the daily traffic volumes on Opal Drive (immediately west of Parkside Way) are predicted to be:

- ◆ 1,800 for 2015 Market and no project;
- ◆ 3,900 for 2015 Market with project;
- ◆ 2,500 for Cumulative no project; and
- ◆ 4,700 for Cumulative with project.

The equivalent numbers were not published for Parkside Way (north and south of Opal Drive) and should be included in the FEIR.

The cumulative traffic volumes do not include any significant levels of development to the west of Fiddymment Road. Therefore, the "ultimate" daily traffic levels on Opal Drive are likely to be substantially higher than 4,700. The FEIR should include an estimate of traffic volumes on Opal Drive and Parkside Way with likely future development to the west of Fiddymment Road.



Mr. Stephen DesJardins  
Diamond Creek Partners  
May 23, 2000  
Page 2

Traffic generated by the Diamond Creek subdivision is unlikely to use Opal Drive and Fiddymment Road as a means to travel west and south due to the longer travel distance and time when compared to alternative routes. Therefore, the above numbers suggest that approximately 2,000 vehicles per day will be using Opal Drive as a "short-cut" between Fiddymment Road and Blue Oaks Boulevard (and even higher volumes with development west of Fiddymment Road). Phase 3 of the North Roseville Specific Plan adds approximately 2,100 trips per day to Opal Drive near Parkside Way.

### **Potential Solutions**

Three fundamental approaches to the problem can be pursued:

- 1) reduce the attractiveness of Opal Drive/Parkside Way as a "cut-thru" between Fiddymment Road and Blue Oaks Boulevard;
- 2) reduce the use of Opal Drive/Parkside Way for traffic generated by Phase 3 of the North Roseville Specific Plan; and/or
- 3) reduce the amount of traffic generated by Phase 3.

The most effective way to reduce the attractiveness of Opal Drive/Parkside Way as a cut-thru route is by creating a discontinuity in Opal Drive. This could be accomplished by eliminating or relocating the segment of Opal Drive that is planned between Fiddymment Road and the north-south collector road within Phase 3 as shown on the attached Figure 1. The elimination or relocation of a portion of Opal Drive would not preclude the creation of a bike path/route along Opal Drive between Phase 3 and Diamond Creek.

The level of traffic generated by Phase 3 of the North Roseville Specific Plan that uses the Opal Drive/Parkside Way route can be reduced by orienting the traffic loading to Fiddymment Road and the north/south collector. The north/south collector within Phase 3 should be emphasized because the property owner has control over the design of the facility (i.e.- does not need to have fronting homes). The southern portion of Parkside Way serves the equivalent function for the Diamond Creek property in bring local traffic to the major arterial (Blue Oaks Boulevard).

If the densities for the Phase 3 area of the North Roseville Specific Plan were to be reduced to the level identified in the DEIR for Alternative 2 (266 dwelling units), then the project traffic generation would be reduced by approximately 35%. While this would reduce the traffic volume on Opal Drive/Parkside Way, it would not be sufficient to remedy the problem without one of the two other actions described above.



FEHR & PEERS ASSOCIATES, INC.  
*Transportation Consultants*

Mr. Stephen DesJardins  
Diamond Creek Partners  
May 23, 2000  
Page 3

**Recommendation**

I recommend a combination of the first and second strategies described above. Namely, eliminating the attractiveness of the roadway as a cut-thru route and de-emphasizing the loading on to Opal Drive from Phase 3 will reduce the traffic levels on Opal Drive and Parkside Way within Diamond Creek to be consistent the with original intent of these roadways.

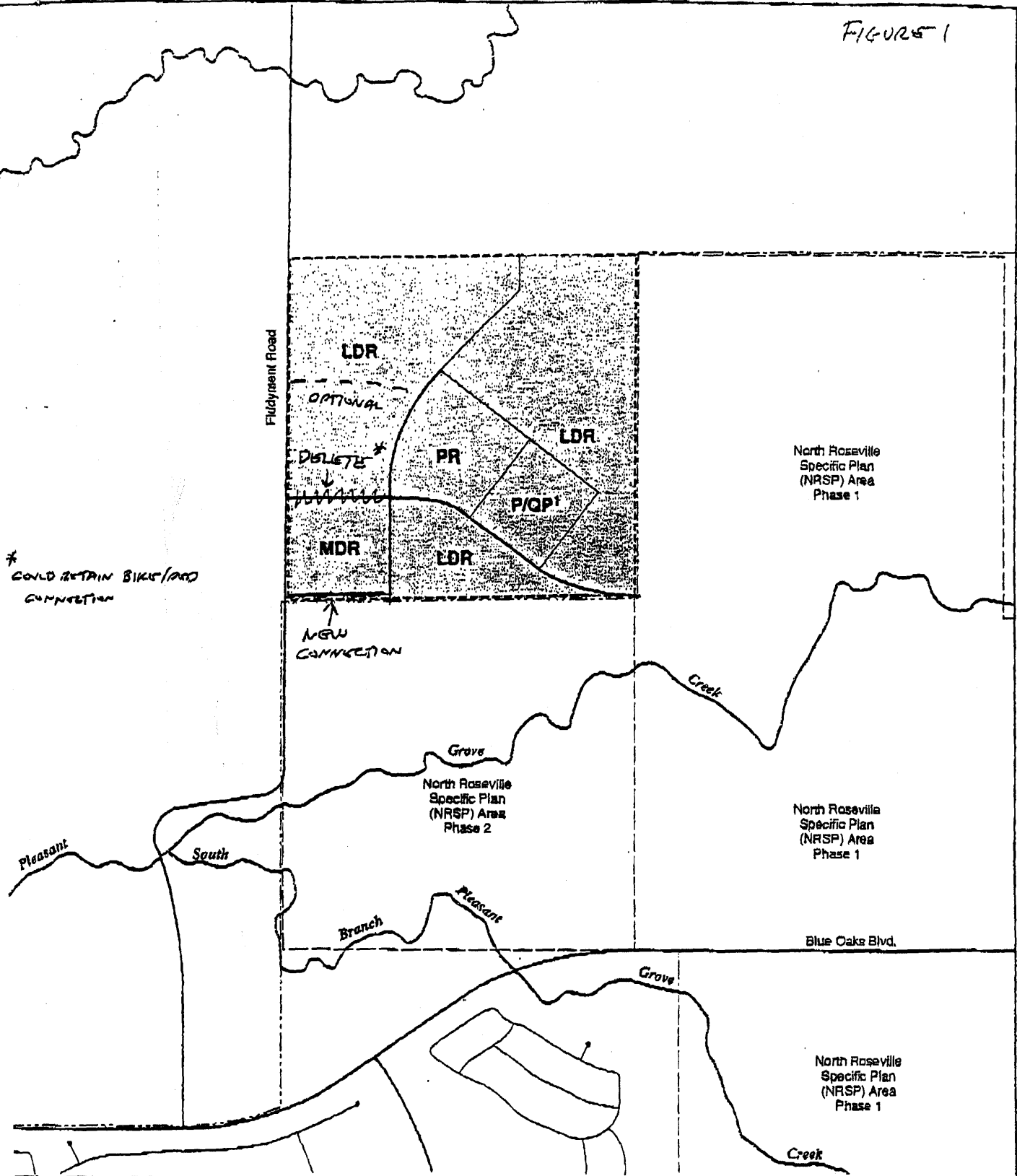
Sincerely,

FEHR & PEERS ASSOCIATES, INC.

Steven J. Brown, P.E.  
Senior Vice President

972-716

FIGURE 1



\*  
 \* COULD RETAIN BIKES/ROAD  
 CONNECTION

NEW  
 CONNECTION

Pleasant

South

Branch

Pleasant

Grave

Creek

and Use Designations Key

- DR Low-Density Residential
- DR Medium-Density Residential
- R Park
- QP Public/Quasi-Public

- Project Site
- Roseville City Limits
- NRSP Boundaries

<sup>1</sup>School site may be eliminated based on direction from the Roseville City School District.

SOURCE: City of Roseville, North  
 Roseville Specific Plan, June 1998;  
 EIP Associates, April 2000.

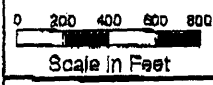


Figure 1

Proposed Land Use Designations

**COMMENT LETTER 11: Stephen L. Des Jardins****Response to Comment 11-1:**

The 45-day public comment period was originally scheduled from May 3 through June 16, 2000. The close of the comment period was extended 27 days for a total of 72 days, from June 16, 2000 through July 13, 2000.

**Response to Comment 11-2:**

The comment requests that traffic volume information be provided on Parkside Way, and that the impacts of a potential "offset" on Opal Drive be tested to determine if it would reduce volumes on Opal Drive and/or Parkside Way. Table 1 summarizes forecasted traffic volumes on Opal Drive and Parkside Way with and without the proposed project, and with and without an offset on Opal Drive.

Location	2015			Cumulative		
	Without Project	With Project		Without Project	With Project	
		Without Offset	With Offset		Without Offset	With Offset
Opal - west of Parkside	1,800	3,900	4,000	2,500	4,700	4,300
Parkside - north of Opal	1,100	1,300	1,200	1,200	1,400	1,300
Parkside - south of Opal	2,000	3,900	4,000	3,100	5,000	4,800

Source: DKS Associates, August 2000.

The forecasts in Table 1 indicate the following:

- Traffic volumes on Parkside Drive north of Opal Drive with and without the proposed project would be lower than the 2,000 ADT threshold that was the concept and intent of the North Roseville Specific Plan.
- The proposed offset on Opal Drive would have little impact on traffic volumes on Opal Drive or Parkside Way
- The proposed project would cause only a minor increase in the traffic volume on Parkside Drive north of Opal Drive, with or without the proposed offset on Opal Drive.

While all local roadways would operate within their design capacities either with or without an off-set, the less direct route created by the off-set would reduce some trips on the park side north of Opal. As a result, the off-set has been included in the project.

**Response to Comment 11-3:**

The densities in the proposed project and referenced Diamond Creek project are similar. The average density of all residential parcels within the proposed project is 4.7 du/ac, and within the adjacent Diamond Creek project north of Pleasant Grove Creek is 4.5 du/ac. In addition, Parcel DR-3 within the proposed project abuts Diamond Creek and has a proposed density of 4.3 du/ac. The adjacent parcels in Diamond Creek, DC-1A and DC-2, have densities of 4.6 du/ac and 4.7 du/ac respectively.

**Response to Comment 11-4:**

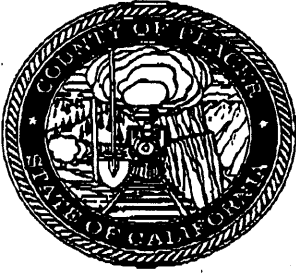
Comment noted. While not an EIR issue, the proposed project does include decorative street lights (Mourier 160 and Phase 3) and a decorative bridge (Mourier 160).

**Response to Comment 11-5:**

The Draft EIR analyzed development of the project both with an elementary school and without. If the project includes an elementary school the total number of elementary school students generated would be 274 and without the school would total 270 students. As discussed on page 4.8-36 of the Draft EIR, there are two elementary schools and one middle school proposed as part of the NRSP. If the project is developed without an elementary school, the elementary school students would be accommodated in existing schools. However, these schools would need to be expanded to accommodate the increase in students. The landowner is required to pay school impact fees and enter into school mitigation agreements to assure that full funding will be available to provide land and resources to construct new schools. Based on this requirement the impact is less than significant.

**Response to Comment 11-6:**

Comment noted.



## PLACER COUNTY

11414 B Avenue/Auburn,  
Web Page: <http://>

LETTER 12

JUL 20 2000

### PLANNING DEPARTMENT

July 19, 2000

Laura Conti  
City of Roseville Planning Department  
316 Vernon Street, Ste. 104  
Roseville, CA 95678

**Subject: North Roseville Specific Plan Phase III - Draft Environmental Impact Report**

Dear Ms. Conti:

This is in response to the City of Roseville's request for comments on the Draft Environmental Impact Report for the North Roseville Specific Plan Phase III. The Placer County Planning Department appreciates the opportunity to respond to this proposal given the proximity of the proposed land uses adjacent to the unincorporated area.

The project proposal of a 50' buffer does not adequately mitigate against land use conflicts between agricultural and urban land uses (Impact 4.1-2). The Placer County General Plan and Sunset Industrial Area Plan require a buffer range of 50' to 200' between residential and rangeland/pasture land uses. In addition, the buffer areas proposed with the project should not be incorporated into the Fiddymont Road or any other right-of-way or into the rear yards of individual properties where there is a potential for dust, odor, and noise, from agricultural activities to interfere with the outdoor activities of the property owners.

12-1

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

12-2

Thank you again for your consideration of our comments. We continue to believe that changes should be made to the project to address these concerns. If you have any questions regarding these comments, please do not hesitate to contact me directly.

Ms. Conti  
RE: NRSP Phase III  
July 19, 2000  
Page 2

Sincerely,

  
PAUL THOMPSON  
Senior Planner

cc: Fred Yeager, Director of Planning  
Supervisor Weygandt  
CEO  
Chron file

PT:pt

ref: t:\cmd\cmdp\paul\erc\doctor's ranch

**COMMENT LETTER 12: Paul Thompson, Placer County Planning Department**

**Response to Comment 12-1:**

The Placer County General Plan requires a buffer of between 50 - 200 feet between residential and agricultural uses. As specified in the County's General Plan, a buffer of 50 feet is considered adequate between rangeland and residential uses. The commentor does not indicate why a buffer of 50 feet is insufficient in this instance. The adjacent agricultural land to the north and west of the project site is currently not used for intensive agricultural activities (i.e., growing crops) so little dust, noise, or odors are generated. At present, the land is fallow and is not used for grazing activities. Therefore, due to the limited agricultural activities that occur in this area a buffer of 50 feet is adequate to buffer any residential uses from neighboring agricultural areas. In addition, the 50 foot buffer would include a 6 foot wood or masonry fence at the edge of the property. Please see Response to Comment 6-6.

**Response to Comment 12-2:**

Comment noted. The City is complying with Placer County's policy by providing buffers consistent with the County General Plan in those areas adjacent to land designated agricultural.

## ENDNOTES

1. Letter to Art Champ, U.S. Army Corps of Engineers, Programmatic Formal Endangered Species Act Consultation on Issuance of 404 Permits for Projects with Relatively Small Effects on Listed Vernal Pool Crustaceans within the Jurisdiction of the Sacramento Field Office, February 28, 199.
3. California Department of Water Resources, *Evaluation of Ground Water Resources: Sacramento Valley, Bulletin 118-6*, August 1978.
4. *Placer County Flood Control and Water Conservation District Stormwater Management Manual*, Version 3, February 1994, p. VII-4. For example, if the existing rate was 1,000 cfs, and an unmitigated project were to increase the rate to 1,100, the project would need to mitigate post-project flows to 990 cfs under the proposed revision. Under the current policy (achieve 90% of pre-project flows), the project would need to mitigate post project flows to 900 cfs in this example.

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***4.PUBLIC HEARING MINUTES***

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**City of Roseville  
Parks & Recreation Commission  
July 10, 2000**

**Commissioners Present:** Nicholas Alexander, Ken Sahl, Gene Endicott,  
Gina Garbolino, Cory Tapia, David Uribe

**Commissioners Absent:** Audrey Huisking

**Staff Present:** Mike Shellito, Director  
Paula Finley, Park Development Manager  
Laura Conti, Planning Department  
Dan Dameron, Planning Department  
Julie Sparkes, Recording Secretary

**I. Roll Call**

**II. Pledge of Allegiance**

**III. Approval of Minutes**

*M/S Uribe/Tapia to approve the minutes of June 5, 2000 and June 15, 2000. The motion was passed unanimously. Mrs. Garbolino abstained.*

**IV. Public Comments**

None

**V. Special Requests/Reports/Presentations**

**A. NRSP III**

Ms. Finley and Ms. Conti reviewed the proposal for the park plan in the public facilities section of the North Roseville Specific Plan, Phase III.

Mr. Endicott questioned the phrase 'meets active park requirements.'

Ms. Finley responded that in the NRSP, the active park requirements are met by this plan.

Mr. Sahl questioned that Phase III is not within the City limits.

Ms. Conti commented that this is the conceptual park improvement approval prior to the annexation. Mr. Dameron added that this is typical to conceptually make sure this plan adequately meets the needs of the City prior to annexation.

Mrs. Garbolino commented that there are no Class I bicycle trails. Are there enough connecting trails in this plan?

Ms. Finley responded that the Class 2 trails will connect to the Class 1 trails. There are enough connecting trails in this plan.

Mr. Alexander questioned parking on the street.

Ms. Finley commented that the West and South side of the park has on street parking. The East and North side are planned homes.

### **Open to the Public**

Steve Schnoble, Mouier Land Construction, 1830 Vernon Street, #9, Roseville.

Mr. Schnoble added that this plan has set up a maintenance fund for Phase III, it will complete a turnkey development in Phase II, and contribute \$571,800 to city improvements.

Mr. Endicott questioned the type of development in Phase III.

Mr. Schnoble stated that it is all residential development.

Mr. Uribe questioned the amount of wetlands in this area.

Mr. Schnoble commented that there is .08 acres of vernal pool that they are requesting to fill.

### **Closed to the Public**

*M/S Garbolino/Sahl to recommend approval on the park plan in the public facilities section of the North Roseville Specific Plan – Phase III, to be forwarded on to the City Council for their review and consideration.*

#### **B. Fall CIP/Strategic Plan Workshop**

Tentative workshop set for September Commission meeting on 9/11/00. Location TBA.

### **VI. Reports/Comments/Commission/Staff**

#### **A. Updates and Reports from Department Staff**

Mr. Uribe commented on the new format of the CIP Report.

#### **B. Commission Questions & Comments**

The Commission welcomed Gina Garbolino back to the Parks and Recreation Commission.

Mr. Uribe gave an update of the Veterans Memorial Planning Committee.

*M/S Uribe/Endicott to adjourn the meeting.*

**CITY OF ROSEVILLE  
PLANNING COMMISSION MEETING  
JULY 13, 2000  
MINUTES**

Planning Commissioners Present: Gray Allen, Rex Clark, Kim Delgado, Ted Gaines, Rocky Rockholm, Betty Sanchez.

Planning Commissioners Absent: Patricia Efseaff, excused

Staff Present: Patty Dunn, Planning Director  
Dan Dameron, Principal Planner  
Chris Burrows, Senior Planner  
Laura Conti, Administrative Analyst  
Aaron Busch, Associate Planner  
Mike Dour, Associate Planner  
Rich Glenn, Deputy City Attorney  
Julie Pistone, Recording Secretary

**PLEDGE OF ALLEGIANCE** - Led by Commissioner Hoskinson

**MINUTES OF JUNE 22, 2000**

Vice-Chair Gaines asked if anyone had anything to add or change on the June 22, 2000, minutes.

Commissioner Sanchez requested the minutes be amended to correct the spelling of Commissioner Rockholm's name on page 2.

**MOTION**

Commissioner Rockholm made the motion, which was seconded by Commissioner Allen to approve the minutes of June 22, 2000, as amended.

The minutes were approved by General Consent. Commissioner Clark abstained since he was not present at that meeting.

**ORAL COMMUNICATIONS** None.

**CONSENT CALENDAR**

Vice-Chair Gaines asked if anyone wished to remove any of the items from the Consent Calendar for discussion.

Vice-Chair Gaines asked for a motion to approve the Consent Calendar as listed below:

**V-A. VARIANCE - 2195 BEATTY WAY - (JEFFERSON STORAGE BUILDING) - FILE# V 00-07** The applicant requests approval of a Variance to allow the placement of a 158 square foot accessory storage building with reduced sideyard and rear yard setbacks. Applicant - Todd Jefferson. (Murray)

**V-B. CONDITIONAL USE PERMIT AND ADMINISTRATIVE PERMIT - 911 WASHINGTON BLVD, SUITE 203 - (ST MATTHEW LUTHERAN CHURCH) - FILE# CUP 00-05; AP 00-18.** The applicant requests approval of a Conditional Use Permit to allow a community assembly use (St. Matthew Lutheran Church) within a Light Industrial zone. Also associated with the request is an Administrative Permit to permit a parking reduction for shared parking. Applicant - Clifford Ball; St Matthew Lutheran Church. (Murray)

**MOTION**

Commissioner Clark, made the motion, which was seconded by Commissioner Hoskinson, to approve the Consent Calendar as submitted.

The motion passed unanimously.

### **NEW BUSINESS**

**VI-A. DESIGN REVIEW PERMIT MODIFICATION & CONDITIONAL USE PERMIT MODIFICATION - 3020 TAYLOR ROAD - (FUTURE FORD DETAIL SHOP) - FILE# DRPMOD 00-28 & CUPMOD 00-08.** The applicant requests approval of a Design Review Permit Modification to modify and enlarge the building footprint and modify the exterior elevations of the automobile detail shop building, and a Conditional Use Permit Modification to modify the previously approved conditions of approval regarding hours of operation and the ability to store other vehicles (e.g. boats, trailers) on site. Applicant - Dan Richards, Williams & Paddon. (Busch)

Associate Planner, Aaron Busch, presented the staff report and responded to questions.

Applicant, Jack Paddon, Williams & Paddon Architects, 2237 Douglas Blvd. #160, Roseville, addressed the Commission and responded to questions. He stated that he had received a copy of the staff report and was in agreement with staff's recommendations.

Vice-Chair Gaines opened the public hearing and invited comments from the applicant and/or audience.

Resident, Helen Gibson, 6560 Woodcrest Ct., Rocklin, addressed the Commission to speak in opposition to the modifications to the approved project.

Owner, Jeff Pleau, Futura Ford/Future Nissan, 600 Auto Mall Drive, Roseville, addressed the Commission and responded to questions.

Vice-Chair Gaines closed the public hearing and asked for a motion.

### **MOTION**

Commissioner Hoskinson, made the motion, which was seconded by Commissioner Allen, to continue this item off calendar to be re-noticed for a future meeting.

The motion passed unanimously.

**VI-B. DESIGN REVIEW PERMIT MODIFICATION & REZONE - 3995 FOOTHILLS BLVD. - (WALGREEN'S SHOPPING CENTER) - FILE# DRPMOD 00-01 & RZ 00-01.** The applicant requests approval of a Rezone to modify the Development Standards to allow the landscape setback along the eastern 260 feet of Switchman Drive to be reduced from 35 feet to 27 feet and a Design Review Permit Modification to allow the masonry wall to be placed at the 27 foot setback and to revise the phasing plan for the completion of site improvements. Applicant - Steven Thomas, Thomas Properties. (Henson)

Senior Planner, Chris Burrows, presented the staff report and responded to questions.

Applicant, Lester Meu, George Meu Architects, 555 Howard St., San Francisco, addressed the Commission and responded to questions. He stated that he had received a copy of the staff report and was in agreement with staff's recommendations.

Vice-Chair Gaines opened the public hearing and invited comments from the applicant and/or audience.

Vice-Chair Gaines closed the public hearing and asked for a motion.

### **MOTION**

Commissioner Hoskinson, made the motion, which was seconded by Commissioner Rockholm, to recommend that the City Council adopt the two (2) findings of fact for the Rezone as listed; and recommend that the City Council approve the Rezone; adopt the two (2) findings of fact for the Design Review Permit Modification and approve the Design Review Permit Modification with the four (4) conditions of approval as submitted in the Staff Report.