

project “suspend grading operations when wind is sufficient to generate visible dust emissions crossing the boundary line of a project site, despite the application of dust mitigation measures.” This mitigation measure also applies to construction of drainage basins. Thus, the impacts of constructing drainage basins have been adequately addressed.

Comment 39

(The EIR and the Responses to Comments do not contain adequate information on agricultural buffers and do not contain adequate information on how the reduction of buffers would affect agricultural operations; the EIR fails to include sufficient information that justifies a reduction in the General Plan policies regarding buffers of agricultural lands and sensitive open space and wildlife habitat.)

This comment mixes agricultural setback/buffer standards and the need for open space preserve buffers along the Watt Avenue extension.

Agricultural buffers and setbacks are related to protecting non-agricultural land uses from adjacent agricultural practices (e.g. dust, odors, noise, chemicals, etc.). The purpose of such buffers and setbacks stems from right-to-farm policies, the desire to promote economically feasible agricultural activities, and the protection of health and safety when agricultural lands adjoin non-agricultural lands. In this context, the commenter’s reference to Placer County General Plan Policy 1.H.6 applies only to agricultural buffers, not to Open Space buffers.

The Project proposes a General Plan Amendment that provides for project-specific evaluation of non-agricultural land uses, focusing on the extent, type, and need for agricultural buffers. There is nothing inherent in this proposal that would mean a reduction in agricultural buffers, as the commenter seems to imply. It would simply provide a method for considering proposed land use changes, analyzing the potential for impact from adjacent agricultural activities, and developing specific buffer/setback measures to address the issue. Thus, agricultural buffers/setbacks could be the same, smaller, or larger than is currently the case, but that buffer/setback would be arrived at through specific analysis, rather than reliance on a programmatic standard that may or may not be applicable to the case at hand.

The commenter stated that the buffer between the Watt Avenue extension and the adjacent West Roseville Specific Plan wetland preserve is “...clearly inadequate.” The proposed Watt Avenue extension incorporates a number of features, however, that serve to protect the adjacent open space area, making the proposed buffer sufficient and avoiding the need for a 50-foot buffer:

- 1) The Watt Avenue extension was aligned to avoid direct impact to the West Roseville Specific Plan wetland preserve, with the alignment of the northern portion of the

proposed Watt Avenue extension being deflected to the west to lie wholly on the Regional University project site. No grading will occur within the preserve.

2) The Watt Avenue extension is also designed to direct surface storm water flows into the Project's storm drain system. No surface flows from the roadway or other hard surfaces would flow eastward into the preserve.

3) No irrigated landscaping is proposed for the eastern edge of the alignment. This precludes irrigation leakage into the adjacent preserve and minimizes the likelihood of introducing additional non-native species into the preserve.

4) The Watt Avenue extension is a "single-loaded" street, with development occurring only on the west side of the road. Further, this configuration is consistent with design guidelines for the West Roseville Specific Plan, which encourages single-loaded streets for lands adjacent to the preserve (e.g. Figure 12-28, WRSP).

Indeed, the location of the proposed Watt Avenue extension, in relation to the West Roseville Specific Plan wetland preserve, is no different in kind from the approved development within the West Roseville Specific Plan Area. All of the interfaces between the West Roseville Specific Plan development areas and the wetland preserve were evaluated for indirect impacts to aquatic habitat and mitigated accordingly.

Mitigation is provided for any similar indirect impacts to aquatic habitat caused by development of the Regional University Specific Plan area, including those accruing from the construction of the Watt Avenue extension, as provided for in the Environmental Impact Report for the Regional University Specific Plan.

Comment 40

(The EIR does not address how the RUSP will be changed if the project fails to find a University to occupy the project site, the statement that the developer is willing to donate the land for Regional University is insufficient.)

As of early October 2008, the RUSP applicant had entered into a Donation Agreement with Drexel University, making it very likely that the "University" portion of the RUSP will, indeed, be developed by a University. In the unlikely events, however, that (i) this specific scenario does not come to pass and that (ii) no replacement University proponent can ever be found, the result would be that the University portion of the Specific Plan area would remain undeveloped agricultural land while the "Community" portion would build out as planned. In other words, the environmental effects associated solely with University development simply would not occur, and the (partial) project as eventually built out would have a smaller footprint than the full RUSP as currently envisioned. As a result, fewer and diminished, environmental impacts would occur. Nothing in CEQA disallows a scenario. In fact, as with any legislative planning document such as a general plan, community plan, or specific plan, there is always a chance that parts of the larger

project area (e.g., certain land uses more difficult to attract than others) will not be built. This theoretical possibility is by no means unique to the RUSP.

Comment 41

(The EIR does not include sufficient information to show that the requirements for development within the Future Study Area have been met.)

The commenter has apparently overlooked discussion in the EIR regarding how the RUSP is consistent with the policies of Part III of the General Plan, which sets forth the criteria regarding when and how areas within the Future Study Area may be approved for development. These issues were not neglected in the EIR. For example, in its discussion of Impact 6.2-2, the Draft EIR stated:

As discussed in Impact 6.2-1, the proposed project would convert farmland to non-agricultural uses. Of the land that would be disturbed for construction of the proposed project, approximately 1,024 acres are used for agriculture. General Plan policy 1.H.4 allows the conversion of existing agricultural land to urban uses only within community plan areas and within city spheres of influence where the subject land is designated for urban development on the General Plan Land Use Diagram. Although the project site is not within an approved community plan area, it is within an area defined in the General Plan as a "Future Study Area." As stated in Part III of the Placer County General Plan, the County "recognizes that as the county continues to grow, additional areas may be identified as being suitable for development at urban or suburban densities and intensities. The most appropriate location for such additional growth, and the area that will be considered first by the County, is the "Future Study Area." The County is considering a portion of the Future Study Area, including the RUSP site and much of the land bordering the RUSP site, for development as the Curry Creek Community Plan, though the County has not yet initiated the formal planning process. So, although the project site is currently designated for agriculture, it[']s possible conversion to other uses was anticipated in the General Plan as a Future Study Area.

(DEIR, p. 6.2-15.)

Further, in the discussion of Impact 6.2-3, the Draft EIR stated:

The proposed project would convert farmland to develop a university campus and mixed use community and associated off-site infrastructure on land currently designated for agricultural uses in the County General Plan and zoning ordinance. However, the proposed project is within the "Future Study Area," indicating that the County has determined that the subject land is appropriate to consider for suburban or urban growth. Therefore, although the project site is currently designated for agriculture, its ultimate

conversion to other uses was anticipated in the General Plan. In addition, much of the land bordering the RUSP project site is planned, or being considered, for future urban development. In addition, the proposed project includes an amendment to the General Plan to designate the project site for development. Therefore, the project as proposed would not conflict with the Agriculture designation in the General Plan.

(DEIR p. 6.2-17.)

Although, as explained in Response to Comment 19-24 (RUSP FEIR, p. 4-70), “[t]he process for development in the County’s Future Study Area is not a CEQA issue,” the County staff has nevertheless prepared an analysis of the extent to which the RUSP is consistent with the criteria in Part III of the General Plan for when, and what sort of, development can occur in the area. The contents of the report to the Planning Commission explaining this consistency is included below:

Part III of the General Plan outlines standards and requirements applicable to development of the Future Study Area. Set forth below is an analysis of the proposed Regional University project's consistency with General Plan Part III.

1. The County shall consider GPAs that designate areas for significant new growth only when they can be comprehensively planned as single units according to an adopted specific plan that complies with these standards and requirements.

Analysis: As required by the Placer County General Plan, the applicant has submitted a single-unit Specific Plan application that provides a comprehensive land plan for the approximately 1,157 acres that are included within the limits of this proposed project.

2. Where appropriate, annexation should be considered first for proposed urban projects. The County supports logical, planned growth, contiguous to existing urban areas.

Analysis: The proposed Regional University Specific Plan project is located outside of any current Sphere of Influence areas for existing cities in Western Placer County, and no cities have proposed the inclusion of this project area within a Sphere of Influence. Based upon a staff report prepared for the City of Roseville City Council at its February 20, 2008 meeting, City staff has identified possible limits for any future westerly expansions for the City of Roseville beyond the Sphere boundaries, and this project area is not located within the identified limits of westerly growth for the City. The proposed project area abuts the previously approved West Roseville Specific Plan Area, and so the project is in fact contiguous to existing urban areas.

3. The County shall consider GPAs that designate areas for significant new growth where the planning and design carries out the following objectives:

- a. Concentrate higher-density residential areas and appropriate support services along segments of the transportation system with good road and transit connections to the remainder of the region;
- b. Support concentrations of medium and high-density residential uses and higher intensities of non-residential uses within one-quarter mile of transit stops along trunk line of major transportation systems;
- c. Support the development of integrated mixed-use areas by mixing residential, retail, office, open space, and public uses while making it possible to travel by transit, bicycle or foot, as well as by automobile;
- d. Provide buffers between residential and incompatible non-residential land uses;
- e. Enhance community identity by creating retail/office commercial centers that also serve as cultural and activity centers for communities;
- f. Provide a bicycle path and pedestrian walkway network to link public facilities, housing, and commercial centers;
- g. Provide buffers for major public facilities such as landfills, airports and sewage treatment plants; and
- h. Provide buffers which create distinct, separate urban communities.

Analysis:

3a. Consistent with this requirement, the project applicant has designed a land use plan that concentrates higher density residential uses and support services along the higher-capacity arterial (e.g., Watt Avenue) and thoroughfare roadways (e.g., University Boulevard, 16th Street) within the project. Lower density and less intensive land uses are located away from these higher-capacity roadways.

3b. The proposed project has been designed around a multi-modal transportation system that will serve development in Western Placer County. Additionally, with the proposed Regional University as the focal point of the development, a transit center has been included as a major element of both the campus and the surrounding community. Transit stops are incorporated throughout the proposed project such that no area of the project will be more than one-quarter mile away from a transit stop.

3c. Consistent with the requirements of Part III of the Placer County General Plan, and consistent with the "Blueprint" model adopted by the Sacramento Area Council of Governments, the proposed project is designed to mix residential, retail, office, open space, and public uses in a manner that allows for persons to choose their mode of travel - either by transit, bicycle, walking, or by automobile.

3d. To assure that incompatible land uses are not located adjacent to each other, the project applicant has used public parks, open space areas and roadways to separate incompatible land uses. In addition, extensive Design Guidelines and Development Standards are proposed to address the relationship of various land uses to each other within the project boundaries.

3e. As previously noted, the focal point of the proposed project is the Regional University property. Given the opportunities to orient the entrances to the university in a manner that integrates the university into the surrounding community, the university will serve as the primary cultural and activity center for the community. Additionally, the project applicant has used the placement of public parks, community centers and commercial areas to complement the University campus and provide commercial and recreational uses within walking and biking distance of the remainder of the Specific Plan area.

3f. A network of bicycle and pedestrian paths is provided throughout the Specific Plan area, linking public facilities, housing and commercial centers.

3g. There are no landfills or sewage treatment plants located in proximity to the project site, and so there is no need to provide buffers from these uses. There is an intermittently used private airstrip located to the south of the university project site, and the project has been designed in a manner, and conditions of approval are included, to assure that an adequate buffer is provided between the private airstrip and the proposed project.

3h. As previously noted, the project applicant has designed the project in a manner where public parks, community centers and open space areas are used to provide buffers between various elements of the community, thereby allowing each element of the community to remain separate and distinct. Regarding surrounding land uses, please refer to Response 8 below.

4. Prior to consideration of such GPAs, the following should have occurred or been demonstrated:

- a. There is a market demand for additional urban or suburban development within the regional analysis area of the County proposed for such development, following an examination of current growth projections, available land, and existing development.
- b. It has been positively demonstrated that the legal, financial and practical ability to project a full range of public services exists.
- c. It has been positively demonstrated that adequate surface water, sewer capacity, and the necessary distribution and collection systems exist or can be built to serve the area proposed for development.

Analysis:

4a. In December 2004, the Sacramento Area Council of Governments (SACOG) Board of Directors adopted the Sacramento Region Blueprint, which looked at how the larger Sacramento region will grow over the next 30 to 50 years. Through its extensive market demand analysis based upon projected growth rates, the analysis concluded that, within the next 50 years, 1.7 million people will be moving into the greater Sacramento region. Because of its generally level terrain, access to highways, job centers and the general suitability of the area to accept development, South Placer County (including this project area) was identified as one of the primary growth areas for the Sacramento region. Accordingly, market demand analyses have been prepared that concluded there is a need for additional urban and suburban development within this immediate project area.

4b. As described in detail in the Environmental Impact Report and associated technical studies prepared for the Regional University Specific Plan project, all public services needed to allow for the development of the proposed project are in fact available. Where appropriate, each of the agencies responsible for providing these public services has publicly acknowledged that their agency has the capacity and ability to provide these public services to the proposed project. As detailed in the Environmental Impact Report and the Conditions of Approval for this project, and consistent with the County's policy that new development be responsible for paying all costs associated with new development so as not to impact existing residents, the project applicant will be responsible for the cost of extending the needed public services to the project site. Accordingly, the proposed project is in fact capable of carrying the financial burden associated with providing public services to the project site. There will be no financial impact to any public agency associated with the provision of public services to the project site.

4c. As described in detail in the Environmental Impact Report and associated technical studies prepared for the Regional University Specific Plan project, adequate surface water, sewer capacity and the necessary distribution and collection systems exist or can be built to serve the area proposed for development. As noted above, the project applicant will be responsible for the cost of extending the needed public services to the project site. There will be no financial impact to any public agency associated with the provision of public services to the project site.

5. New development areas will be expected to provide a balanced complement of land use types, including residential (very low, low and moderate cost), commercial, industrial, office, recreational, public, institutional, and open space. Mixed-use projects, including residential

uses, will be considered where they support the provision of infrastructure and development of industrial uses.

Analysis: As set forth in the Project Description for the Regional University project, the proposed project provides a balance of complementary land uses. As stated in the Specific Plan, and as detailed in the Development Agreement, the project proposes to set aside a minimum of 10 percent of the total number of residential units as affordable housing units. Consistent with the SACOG Housing Compact, four percent of the units will be set aside for Very Low Income households, four percent of the units will be set aside for Low Income households, and two percent of the units will be set aside for Moderate Income households. As detailed above, the Specific Plan has been designed in a manner that integrates the residential and commercial elements of the project around a series of public open space areas. The roadway and entire infrastructure system included with the project has been designed in a manner such that adequate services will be available to meet the population demand generated by the proposed project. Moreover, in addition to direct economic, environmental, cultural and social benefits, implementation of the Regional University project will greatly enhance the County's ability to attract primary wage earner jobs to the Sunset Industrial area, which is viewed as the County's economic engine for future job growth.

6. New development areas shall provide a range of housing types to serve all income groups in the County, and shall stage development such that a balance of housing types is maintained over time, consistent with the housing goals, objectives, policies and programs of the General Plan.

Analysis: As stated in Response 5 above, and as detailed in the Specific Plan for the Regional University project, and consistent with the Placer County Housing Element, the proposed project has been designed to include a variety of residential housing types, all of which are provided at a variety of densities. Consistent with the SACOG Blueprint program, the Regional University project is designed to include single-family detached residential units, single-family attached residential units, and multiple-family residential units. As proposed by the applicant, both for-sale and rental housing opportunities will be provided. Consistent with the programs and policies set forth in the Housing Element for the County's General Plan, affordable housing units will be provided as a part of the proposed project. As stated in the Specific Plan, and as detailed in the Development Agreement, the project proposes to set aside a minimum of 10 percent of the total number of residential units as affordable housing units. Consistent with the SACOG Housing Compact, four percent of the units will be set aside for Very Low Income households, four percent of the units will be set aside for Low Income households, and two percent of the units will be set aside for Moderate Income households. With the

inclusion of these affordable housing opportunities, the proposed project will assure that all persons will have an opportunity to reside within the boundaries of this project.

7. New development areas proposed for urban densities shall be designed to achieve, or shall have a goal of achieving a jobs-housing balance.

Analysis: As described in detail in the Specific Plan, and consistent with the SACOG Blueprint program, the Regional University Specific Plan project has been designed in a manner to assure that there is a jobs-housing balance within the project, thereby providing the opportunity for residents of the project to work within the boundaries of the project. The centerpiece of the proposed project, a four-year, private university, is anticipated to, at build-out, employ more than 5,000 persons. When coupled with the proximity of a multitude of housing opportunities, the Regional University project will promote a healthy jobs-housing balance which will, in turn, reduce the number of Vehicle Miles Traveled for residents within this project. Additionally, with the inclusion of commercial/retail services within this project, residents of the project will not have to travel outside of the boundaries of the project for essential services, thereby further reducing the Vehicle Miles Traveled for each residence within the project.

8. New development areas must include appropriate buffer zones to provide separation between potential incompatible land uses, consistent with the standards for buffer zones specified in Part I of this Policy Document. The size of the buffer zone is to be proportionate to the total project size and proposed uses. The location of the buffer will depend upon the location of the proposed development relative to other sensitive land uses and/or environmental features.

Analysis: As noted above, and consistent with the requirements of the General Plan, the Regional University Specific Plan project has been designed in a manner to assure that appropriate buffers are included within the design of the project to separate potentially incompatible land uses. Additionally, amendments to the General Plan are proposed to allow for determinations that it may be unnecessary or inappropriate to provide buffers to incompatible land uses, including agricultural land uses. Nevertheless, the University portion of the Regional University Specific Plan provides approximately 183 acres of open space on the 600-acre university site, with large portions of such open space providing sizeable buffers to a portion of the northern, western and southern boundaries of the University portion of the project boundaries.

9. New development areas shall be designed and constructed to provide all public infrastructure, facilities and services necessary to serve both initial

and build-out populations, including but not limited to: adequate surface water supplies; sewage collection, treatment, and disposal facilities; public utilities; police and fire protection and emergency services, school and medical facilities where warranted by population; and public transportation. Extensions of new infrastructure, including water, sewer, roads, etc., should be compatible with existing incorporated Cities' General Plans. (See also Response 16. [below])

Analysis: As detailed in the Regional University Specific Plan and the many technical analyses prepared for this project, and as stipulated in the Development Agreement prepared for this project, the project applicant will be required to construct all infrastructure (i.e., roadways, water lines, sewer lines, utilities) needed to serve the proposed project. Additionally, consistent with County requirements, this infrastructure will need to be in place and operational prior to any residents or businesses moving into the area.

The Placer County Water Agency is the purveyor of water to the project site. Based upon a signed agreement by and between the project applicant and the water agency, there are in fact adequate surface water sources available to serve the proposed project. The applicant will be constructing a line to connect this project site with the Pleasant Grove Wastewater Treatment facility, located to the northeast of this project site, and there is adequate capacity within the facility to accommodate the wastewater generated by this proposed project, though the County recognizes that the service area boundary of the South Placer Wastewater Authority needs to be expanded to include the Regional University project area. The serving police and fire protection agencies have each stated that they will be able to serve the proposed project. The project applicant has been working cooperatively with the various school districts that serve this project area and, based upon agreements with those school districts, the project applicant has provided a series of elementary and middle schools within this project area. As previously discussed, the proposed project, along with the University portion of the project, will include an extensive public transportation system. This transportation system will not only move people around within the boundaries of the project, but the system has also been designed to provide regional connections to Roseville and other locales within Placer and Sacramento counties.

10. New development areas should assist in the resolution of regional problems, including but not limited to air quality, transportation, regional employment needs, and growth pressures on existing communities.

Analysis: As detailed in the Specific Plan for the Regional University project, and as further stipulated in the Development Agreement, the proposed project has been designed and conditioned in a manner to assist

in the resolution of regional problems, including but not limited to air quality, transportation, regional employment needs, and growth pressures on existing communities.

The Environmental Impact Report prepared for the Regional University project identified impacts that may be created by the proposed project, and mitigation measures were included that, where feasible, will reduce the identified impacts to a less than significant level. The project applicant has worked cooperatively with the County and the City of Roseville to address local and regional traffic issues, and programs have been established to assure that the implementation of the proposed project will not adversely impact local and regional transportation roadways. In addition, implementation of the proposed project will result in the development of a private, four-year university that will not only provide new educational opportunities for students in the Placer County region, but will also provide a myriad of job opportunities for residents of the area. To assure that the implementation of the proposed project does not adversely impact the surrounding community, the applicant has worked cooperatively with the County and the City of Roseville to include mitigation measures and conditions of approval with the project to offset any such impact.

11. Transit services to serve the project area shall be provided by new development using available state and federal transportation funding. New development shall be responsible for its fair share of such transit services.

Analysis: As previously discussed, the Regional University Specific Plan project includes the development of a multi-modal transportation system and an intricate transit network that will provide alternative modes of transportation throughout the project boundaries and connecting to surrounding communities. As detailed in the Transit Element of the Urban Services Plan prepared for this project, to enhance the transit opportunities provided for this project, the applicant, in concert with the County, will pursue State and Federal transportation funding that may be available to enhance the transit program established for the proposed project.

12. The County shall require that land use form and transportation systems in new development areas be designed to provide residents and employees with the opportunity to accomplish a majority of their trips within the new development area by walking, bicycling, and using transit.

Analysis: As described in Response 3 above, the proposed project has been designed around a multi-modal transportation system that will serve development in Western Placer County. Additionally, with the proposed Regional University as the focal point of the development, a transit center has been included as a major element of both the campus and the surrounding community. Transit stops are incorporated throughout the

proposed project such that no area of the project will be more than one-quarter mile away from a transit stop.

Also, consistent with the requirements of Part III of the Placer County General Plan, and consistent with the "Blueprint" model adopted by the Sacramento Area Council of Governments, the proposed project is designed to mix residential, retail, office, open space, and public uses in a manner that allows for persons to choose their mode of travel- either by transit, bicycle, walking, or by automobile. A network of bicycle and pedestrian paths is provided throughout the Specific Plan area, linking public facilities, housing and commercial centers.

13. The County shall require development in new development areas to be phased in a manner that ensures a balance between the land use and transportation infrastructure at each stage of development. Transportation infrastructure includes roadways, intersections, interchanges, bikeway and pedestrian facilities, and transit facilities (e.g., turn-outs, shelters, storage and maintenance buildings, parking areas for transit and car-pooling, and mode transfer facilities.)

Analysis: As set forth in the Regional University Specific Plan, and as stipulated in the Development Agreement prepared for this project, the project will be phased in a manner that ensures a balance between the land use and transportation infrastructure at each stage of development. Based upon the language included in the Development Agreement, adequate provisions and guarantees are in place to assure that as each phase of the project is developed, adequate infrastructure, including roadways and transportation systems, are in place to serve the population generated by the proposed project.

14. The County shall encourage the use of appropriate new technologies (e.g., telecommuting, traveler information systems, alternative-fuel vehicles, and continuous monitoring systems) in new development areas.

Analysis: While some of these issues (i.e., telecommuting) are out of the specific jurisdiction of the County (except as it relates to County employees), the Regional University Master Developer and the County will examine how such new technologies may be encouraged *as* part of the Regional University Specific Plan's implementation. The County, in association with the Placer County Air Pollution Control District, is already a proponent of the use of alternative-fuel vehicles, and the County is already taking steps to convert its vehicle fleet to hybrid, electric, and alternative-fuel vehicles.

15. Road systems within new development areas shall provide links to internal commercial core areas without requiring the use of an adjacent arterial, thoroughfare, or state highway.

Analysis: In concert with the City of Roseville, the Regional University Specific Plan roadway system has been designed in such a manner that provides links to internal commercial core areas without requiring motorists to use adjacent arterials, thoroughfares or State highways. Within the Specific Plan itself, Watt Avenue, the primary north-south roadway, will provide direct connections to east-west roadways such as Pleasant Grove Boulevard and Blue Oaks Boulevard (and eventually Placer Parkway), thereby keeping vehicles off Base Line Road and Interstate 80.

16. In conjunction with the processing of a GPA application for development located within the future study area, the County will enter into an agreement with the adjoining city that would specify acceptable levels of service (including police, fire, park programs, etc.) and measures to mitigate impacts to municipal facilities (transportation, circulation, parks, libraries, etc.).

The determination of the impact of development on an adjoining city shall consider the fiscal effects of such development based on a fiscal analysis prepared as a part of the General Plan Amendment proposal. Costs and revenues to both the City and County, resulting from a project, shall be considered in such an analysis.

Analysis: Similar to the Placer Vineyards project, the County and the Regional University Specific Plan applicant have worked cooperatively with the City of Roseville to assure that the levels of service associated with the proposed project will be of a level that does not adversely impact existing service levels within the City of Roseville. To this end, the City of Roseville has been involved and has provided extensive and voluminous comments on the technical master plans prepared for this project, as well as the three Administrative Draft EIR and the Draft EIR that were prepared for the project. The County has provided this level of involvement to the City to assure that the City had a voice in how this project developed, as well as to ensure that the County and the City are in agreement as required by Part III of the General Plan. The County, with the cooperation of the project applicant, has been receptive to incorporating the reasonable and relevant concerns of the City into the proposed project and its associated environmental document. The levels of service for police and fire protection are equal to or exceed the levels of service provided by the City of Roseville, and parks programming will be provided so that no impacts are experienced by the City of Roseville. The County has worked closely with the City of Roseville to assure that the

impact fees charged for transportation, circulation, park and other government facilities would be sufficient to meet the actual demand generated by the future residences of the Regional University Specific Plan area, and that no adverse impact would result to existing City of Roseville facilities.

The actual discussions relative to the determination of the impact of development are ongoing between Placer County and the City of Roseville, as the totality of development on the westerly side of the County (i.e., the Sierra Vista Specific Plan, the Creekview Specific Plan, the Placer Ranch Specific Plan and the Brookfield Specific Plan in the City of Roseville; the Regional University Specific Plan and Riolo Vineyards Specific Plan in Placer County) needs to be considered when trying to assess and determine the actual fiscal effects of development, both on Placer County and on the City of Roseville. The County Executive Officer for Placer County and the City Manager for the City of Roseville have committed to moving these discussions forward and reaching conclusion prior to any consideration by the City of Roseville as to possible changes to the current northerly and westerly boundaries of the City of Roseville.

Comment 42

(The EIR cannot rely on the recommended protocol for evaluating the location of sensitive land uses adjacent to major roadways because SMAQMD has allegedly expressed disapproval with the protocol.)

This comment incorrectly implies that the RUSP is under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). It is not. Because the project site is located in Placer County, the project is under the jurisdiction of the Placer County Air Pollution Control District (PCAPCD). The commenter refers to a "similar EIR" where the SMAQMD offered certain opinions, but the commenter does not identify the project for which that EIR was prepared, and does not explain why the project is "similar." It is not clear, moreover, whether the "protocol" mentioned in the quotation is related to health risks from stationary sources (e.g., industrial smokestacks) or mobile sources (i.e., motor vehicles). In light of these vague references, the County has no way to assess how relevant, if at all, the SMAQMD quotation is.

The California Air Resources Board (CARB) suggests siting sensitive receptors more than 500 feet from freeways, rural roads with 50,000 vehicles per day, and urban roads with 100,000 vehicles per day. In preparing the Draft EIR, County staff was aware of this CARB advice, which does not include any method for characterizing risk or specifically address when HRAs should be prepared, in mind as it reviewed the Project for any health risks it might present.

Under the proposed design guidelines for the RUSP, sensitive receptors would be located at least 5 miles from Highway 65 and over 10 miles from Interstate 80, though such receptors would occur within 100 feet of University Boulevard and Watt Avenue. In addition, three of the potential alignments of the planned Placer Parkway, a regional high-speed roadway that would connect SR 65 in Placer County (east of the Plan Area) with SR 99 in Sutter County (approximately 10.5 miles to the west), would be routed to the north of the Project site, the closest (Alternative 4) being approximately 300 feet from the University portion of the Plan Area.

In general, the County looks to the PCAPCD for guidance on how to undertake risk assessments. Notably, PCAPCD has no standard significance threshold or methodology applicable to the assessment of health risks associated with mobile diesel particulate emissions sources. When the County contacted PCAPCD staff on this subject, PCAPCD staff suggested that the County and its environmental consultants use the SMAQMD protocol for mobile sources to assess the risk associated with the project. If, based on the results of the SMAQMD Protocol, no HRA was required, PCAPCD required no further study. As explained on page 6.3-15 of the Draft EIR, SMAQMD has developed a *“Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways, Version 1.0,”* dated January 2007. Under the Protocol, factors to consider in determining when an HRA is necessary include the location of the project site relative to the roadway, the annual average general wind direction, and the traffic volumes on the roadway. The commenter is wrong in suggesting that the County tried to “reduce the cancer risk by assuming shorter exposure periods” than the SMAQMD Protocol requires: the Protocol assumes long term exposure and exposure periods cannot be altered.

The County turned to the SMAQMD Protocol to determine whether a formal HRA was needed to assess potential cancer risk of sensitive receptors exposed to diesel particulate matter. Because sensitive uses (residential and schools) could be located within 500 feet of a busy roadways, the County looked to SMAQMD’s Protocol to see whether, under the circumstances, further study, in the form of an HRA, would be warranted. The Protocol includes screening tables for north-south roads and east-west roads. Based upon the location and distance of the project site relative to the roadway, the annual average general wind direction, and the traffic volumes on the roadway, the table indicates an estimated risk value and whether an HRA is recommended. The evaluation criterion used by the SMAQMD is 446 per million, at which point an HRA is recommended. The County reasonably deferred to the judgment of SMAQMD with respect to these technical considerations.

At project build-out, University Boulevard is anticipated to accommodate 23,000 vehicles per day, while Watt Avenue is expected to accommodate 42,000 vehicles per day. The daily volumes on Placer Parkway are estimated to be between 55,800 and 57,800 east of Watt Avenue for Alternatives 3, 4, or 5 (Placer Parkway Corridor Preservation Tier I EIS/EIR, p. 4.8-74). This would put approximately 2,300 peak hour trips on University Boulevard, 4,200 peak hour trips on Watt Avenue, and 5,800 peak hour trips on Placer

Parkway, assuming approximately 10 percent of the daily traffic would occur during peak hour.

These peak hour volumes were compared to Protocol Table 1 and Table 2 to determine if additional study would be required. Table 1 does not contain values for peak volumes less than 4,000, so based upon estimated peak hour volumes on University Boulevard, an HRA would not be required. Table 2 provides a value of 63 for projects located west of a roadway with peak hour volumes of approximately 4,000 at 100 feet. Therefore, the volumes on Watt Avenue (4,200 peak hour) would be far below the evaluation criterion and would not warrant an HRA. As explained on page 6.3-26 of the Draft EIR, because the Project site is upwind of proposed Placer Parkway (based on average annual wind direction), the relevant portion of the Protocol provides that more than 24,000 *peak hour trips* would have to occur on the roads at issue in order to trigger the requirement for an HRA for sensitive receptors at 300 feet. As discussed above, Placer Parkway would carry approximately 5,800 vehicles in the peak hour, for which a value of approximately 38 is indicated in Table 1. Therefore, because the number of peak hour trips on the Parkway would be well below the evaluation criterion, a site-specific HRA for the Project was not undertaken.

In any event, the Response to Comment 19-78 remains a good summary of why the County's approach was appropriate:

The commenter is incorrect in assuming a Placer Parkway alignment could be within 100 feet of RUSP sensitive receptors. The Draft EIR (page 6.3-15, "Analysis of Placer Parkway Toxic Air Contaminants") clearly explains the alignment options (including the traffic volumes of 40,000 to 70,000 ADT), proposed project siting relative to the alignments, and how the potential effects were evaluated. As stated on Page 6.3-15 of the Draft EIR, "Placer Parkway includes a 500- to 1,000-foot no-development buffer zone, residential or other sensitive uses will not be sited within the 500-foot guidance limit established by some agencies." The Draft EIR correctly applied the method of using Table 1 in *Draft Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* to conclude that more than 24,000 peak hour trips would have to occur along a Placer Parkway alignment that places travel lanes 300 feet from the nearest receptor. As noted in Response to Comment 19-77 and on page 6.3-15 in the Draft EIR, wind direction is a key element of the screening risk estimates. The *Draft Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* is provided herein for reference as Appendix E.

(FEIR p. 4-101 (footnote omitted).)

Comment 43

(The EIR does not include any information on transportation energy use related to the RUSP)

This comment, once again, ignores the fact that this project proposes multiple public transit elements that, in the long run, will reduce transportation-related energy consumption, air pollution, and greenhouse gas emissions. For example, the project provides right of way for future BRT lanes, and provides for the construction of bus stop facilities in the Community component of the RUSP and a transit center on the University property, along with the provision of funding for buses. (See DEIR, pp. 22, 6.12-17 – 6.12-118.) Notably, Mitigation Measure 6.12-24 provides as follows:

The project applicant shall contribute its fair share of the cost to provide public transit service to the study area as determined by Placer County through participation in a benefit or assessment district or through a separate agreement between the applicant and Placer County consistent with Mitigation Measure 6.12-1. At a minimum, service is expected to include the following components:

- *Fixed-route bus service connecting the plan area to the City of Roseville and Placer County Transit with a minimum of hourly headways and a maximum of 15-minute headways added in the peak periods.*
- *Demand-responsive service meeting ADA paratransit requirements within the plan area.*
- *Peak period (a.m. and p.m.) weekday commuter bus service to downtown Sacramento.*
- *Costs shall include the capital costs of transit vehicles and facilities as well as the operating and maintenance costs of the service beyond what will be paid for through the transportation development act (TDA) funding.*

(DEIR, p. 6.12-118.)

Response to Comment 19-54 also addresses the issue of energy consumption:

The commenter states that the Revised Draft EIR did not comply with the requirements of CEQA Guidelines Appendix F regarding energy conservation. The County disagrees, as the commenter's assertion is incorrectly premised on the assumption that Appendix F contains mandatory, rather than advisory, directives. Furthermore, as discussed

below, the Draft EIR includes numerous air quality mitigation measures that require reduced energy consumption, and includes discussions of energy issues in connection with the extension of electrical and natural gas services to the project area.

(FEIR p. 4-79.)

Furthermore, Mitigation Measure 6.3-4 includes a lengthy list of air pollution reduction measures, many of which relate to energy consumption (also briefly referenced in Response to Comment 44). Although not all such measures related to transportation-related energy consumption, the net effect of the measures is to reduce energy consumption and GHG emissions. Mitigation Measure 6.3-4 states, in pertinent part, as follows:

a) *The following guidelines shall be used by the County during review of future project specific submittals for development within the Specific Plan area in order to reduce generation of air pollutants with the intent that specified measures be required where feasible and appropriate. PCAPCD may replace or supplement air pollution measures for individual projects as new technology and feasible measures become available over the course of Plan Area buildout.*

* * *

- *Install two 110/208 volt power outlets for every two loading docks.*
- *Implement the following, or equivalent measures, as determined by the County in consultation with the APCD:*
 - *Establish building guidelines that require the use of high-albedo (low-absorptive) coatings/Energy Star roofing products on all roofs and other building surfaces, if available and economically feasible at the time building permits are issued.*

* * *

b) *In order to incorporate passive solar building design and landscaping conducive to passive solar energy use, the Regional University Specific Plan Design Guidelines shall include the following measures:*

- *Encourage the orientation of buildings to be in a south to southwest direction where feasible.*

- *Encourage the planting of deciduous trees on western and southern sides of structures.*
- *In all residences, include high-efficiency heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces, and boiler units.*
- *In all residential units, include energy-efficient window glazings, wall insulation, and efficient ventilation.*

* * *

c) *In order to promote bicycle usage, a pedestrian/bikeway (P/B) Master Plan shall be developed for the entire Plan Area. This master plan shall be consistent with the guidelines established in the Placer County Regional Bikeway Plan and the Regional University Specific Plan Design Guidelines. The P/B Master Plan shall include the following measure:*

- *Non-residential development shall provide an additional 20 percent of bicycle lockers and/or racks over what is currently required in the applicable local code.*

(FEIR, pp. 2-19—2-22.)

Finally, the Sacramento Area Council of Governments (SACOG) has complimented this project for its Blueprint compatibility. It states that “[t]he design details of a project can facilitate the ease of walking or biking within, as well as to and from the site. At the scale presented, the circulation plan and policies appear to support multimodal connectivity, especially for walking and biking, within and between the University and Community Areas.” (See Letter from Michael McKeever to Michael Johnson, September 24, 2008.)

In light of these comments, the contention that this project lacks information on energy use from transportation lacks merit.

Comments 44

(The EIR is inadequate because it does not include meaningful mitigation measures to reduce greenhouse gas emissions; the EIR improperly fails to include requirements to mitigate to a particular standard; the EIR did not adopt feasible mitigation measures like requiring a building efficiency standard of LEED silver or gold and exceeding Title 24 energy standards by not less than 25%.)

The County disagrees with the commenter's critique of the way in which the project and the County seek to minimize emissions of greenhouse gases (GHGs). The RUSP project contains multiple design elements to help reduce its carbon footprint. The argument that this project lacks any real mitigation lacks plausibility. The Responses to Comments address this issue at length:

the Draft EIR, where relevant, includes an extensive discussion of energy saving measures. Although these measures are included primarily in order to reduce air quality impacts and greenhouse gas emissions, the measures have the simultaneous, salutary effect of reducing energy usage. Mitigation Measure 6.4-3 includes measures to encourage passive solar building design through building orientation and tree planting, and measures to reduce automobile usage by encouraging bicycle use. Mitigation Measure 6.14-1 includes the following measures that would reduce the project's energy consumption:

- a) *Implement Mitigation Measure 6.3-4(a), establishing guidelines for County review of future project-specific submittals for non-residential development within the Specific Plan area in order to reduce generation of air pollutants.*
- b) *Implement Mitigation Measure 6.3-4(b), requiring incorporation of passive solar building design and landscaping conducive to passive solar energy use.*
- c) *Implement Mitigation Measure 6.3-4(c), requiring measures to promote bicycle usage.*
- d) *The following measures shall be used singularly or in combination to accomplish an overall reduction of 10 to 20% in residential energy consumption relative to the requirements of State of California Title 24:*
 - *Use of air conditioning systems that are more efficient than Title 24 requirements;*
 - *Use of high-efficiency heating and other appliances that conform to Energy Star standards, such as water heaters, cooking equipment, refrigerators, and furnaces;*
 - *Installation of photovoltaic rooftop energy systems where feasible; and*
 - *Establishment of tree-planting guidelines that require residents to plant trees to shade buildings primarily on the west and south sides of the buildings. Use of deciduous trees (to allow solar gain during the winter)*