



MOTHER LODGE CHAPTER

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October 15, 2009

To: Loren Clark, Assistant Planning Director
From: Terry Davis, Sierra Club
Re: Comments on Draft PCCP Map of 8-5-09

Loren, thank you for the opportunity to comment on the draft map.

- 1) One of the most striking differences between the 8-5-09 map and those endorsed by the resource agencies (maps 2, 4, 6 & 7) is the extent of urban edge in the proposed map compared to the agency-supported maps. In the field of Conservation Biology, it is widely held that preserves benefit from a low edge effect – round or oval preserves are preferable to angular or linear ones. But there are many angular shapes to the Reserve Acquisition Area in the 8-5-09 map in contrast to maps 2, 4, 6 and 7. The proposed map is replete with urban areas projecting into various portions of the Reserve area, increasing the exposed edge and potentially degrading the biological value of future preserves. The most notable example of an extreme edge effect is the narrow corridor linking the larger Reserve area to the west with the Orchard Creek vicinity. In addition, a narrow habitat linkage such as this one inhibits movement pathways for species. (See *County of Placer, Report of the Science Advisors*, pgs. 7, 8)
- 2) The Reserve Acquisition Area of the proposed map has less acreage than in Maps 2, 4, 6, and 7 which were endorsed by the resource agencies. The 8-5-09 map provides preservation of substantially less vernal pool grassland, resulting in the loss of 50% of existing vernal pools and vernal pool complex grassland throughout western Placer County. The current map provides for a 1:1 rate of preservation, while the maps supported by the agencies varied from a 1.5:1 to a 2.7:1 rate of preservation. In addition, the Vernal Pool Recovery Plan calls for the avoidance of 85% of the remaining vernal pools in the core areas, yet the current map would allow development of 54% of the core areas. Finally, the 8-5-09 map would enable development of 57% of the county's federally designated Critical Habitat.
- 3) One of the largest blocks of high quality vernal pool grassland is not within the Reserve area. The four agency-supported maps all show the area west of Dowd Road, between Wise Road and Moore Road, in the Reserve Acquisition Area. But the 8-5-09 map depicts urban development intrusions of more than 2,000 acres into habitat that was depicted as Reserve in every agency-supported map. The potential development of that essential habitat calls into question the ability of the PCCP to protect enough high quality vernal pool grassland to sustain listed species, and to earn the permitting benefits in is anticipated to provide to covered activities.
- 4) The biological data and Placer County's power point presentations have consistently shown the Orchard Creek vicinity as a critical area for future preservation. The same holds true for the area between East Callett and Phillip Road. Both these areas need to be core preserves, but linkage of

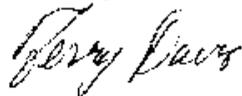
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the two is also essential. In the four agency-supported maps there is substantial habitat linkage between the two, but in the 8-5-09 map there is minimal linkage. Large white (urban) areas intrude into the agency-supported linkage north and south of Catlett Road, and north of Sunset. These areas need to be removed from the white and placed in the Reserve in order to provide linkage between two of the essential core habitat areas.

- 5) There is an area north of Sunset which is in the Reserve that is about 300 acres. It is shown on the maps as 0-1% wetted acres and has a disturbance rating as 'high.' The parcel lacks connectivity to any other preserved habitat. It cannot serve as part of a future core preserve nor connecting habitat between preserves. As an isolated parcel its contribution to the goals of the PCCP are minimal. The agency-supported maps show this area as combined with other land to make up linkage between Orchard Creek and a future core preserve centered north of Reason Farms. Linkage in this location should be restored, or equivalent land should be transferred to another location where it will provide greater long-term habitat value.
- 6) Two isolated fragments of potentially developable land surrounded by Reserve are depicted west of Dowd and north of Moore Rd, and another south of Moore. These small (<200 acre) urban intrusions compromise the Reserve Acquisition Area.
- 7) The habitat values associated with Reason Farms should not be included in the data, if they currently are. There seems to be nothing to preclude portions of this land owned by the City of Roseville from being developed for active recreation, such as golfing, that would destroy the existing habitat values.
- 8) An area has been recently added to the current map; it is described as 'Curry Creek vernal pool conservation.' It captures a rather isolated narrow vernal pool grassland south of Placer Parkway and north and west of anticipated urban development. It is not well situated to contribute to a future system of interconnected core preserves. It would preferable to protect equivalent vernal pool grassland in some other location, such as in the Orchard Creek corridor or west of Dowd Road.
- 9) One might assume that all the habitat in the Reserve Acquisition Area will be preserved. But to date the PCCP has contemplated providing long-term preservation only to a portion of the Reserve area. The granting of a Regional LEDPA is based on the mandatory preservation of a system of linked core preserves. If this is the case, it should be made clear that the habitat numbers associated with avoidance within the Reserve area do not in fact represent the acreage that will be ultimately preserved.

To summarize these comments, the 8-5-09 PCCP map does not provide sufficient avoidance of vernal pool grasslands, and there is too much edge effect which compromises habitat values and ability to effectively manage future preserves. Again, thank you for the opportunity to provide comments.

Sincerely,



Terry Davis
Conservation Program Coordinator



Community Development
311 Vernon Street
Roseville, California 95678-2649

October 15, 2009

Mr. Loren Clark, Deputy Director
Placer County Planning Department
3091 County Center Drive
Auburn CA 95603

Subject: PCCP August 2009 Draft Conservation Reserve Area Map - City Comments and Request for Revision

Dear Loren:

This letter responds to the County's request for comment regarding the recently released August 2009 Placer County Conservation Plan (PCCP) Conservation Reserve Map. The City understands this map is proposed for incorporation into the Agency Review Draft version of the PCCP. We further understand that any revision to the August map requires approval by the PCCP Ad Hoc Committee and that an Ad Hoc Committee meeting is scheduled for this purpose on October 20, 2009. Following Ad Hoc Committee action, we understand the Committee approved version of the map along with County staff recommendations for moving forward with preparation of an Agency Review Draft PCCP will be presented to the Board for consideration on November 3, 2009.

Since 2001 the City has attended numerous meetings and provided consistent comment on the PCCP and various versions of the Conservation Reserve Map. The City's comment history is best summarized in our July 18, 2008 letter to the Board of Supervisors. As has been expressed in numerous letters and emails, the City's primary concerns continue to involve the Conservation Reserve Map treatment of the City owned Reason Farms property and reasonably foreseeable City annexation/development projects. These concerns could be alleviated with implementation of the Conservation Reserve Map revisions described below. Given our understanding of the Reserve Map's required approval process and above planned meetings, the City respectfully requests that the revisions described below be presented to the Ad Hoc Committee on October 20, 2009 for consideration/approval so that the final draft Conservation Reserve Map reflects as best as possible the anticipated jurisdictional boundaries under which the PCCP would be implemented.

Reason Farms – Pleasant Grove Retention Basin Project

It is critical that the City retain the ability to implement the proposed Pleasant Grove Retention Basin project and keep its flood control commitment to Sutter County. The City Council has expressed broad support for the project and in particular for the inclusion of compatible recreation facilities to complement the primary flood control use. As expressed in previous letters and meetings, the City's position has been that this City owned property is not subject to County land use controls and as such should not be designated as Reserve Acquisition Area by the PCCP Conservation Reserve Map. Because the City and County have been unable to agree to PCCP mapping revisions or to a mutual understanding of related jurisdictional authority over the property, the City was compelled earlier this year to initiate annexation. The City selected this approach because annexation appears to be the best

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available option to ensure undisputed City land use authority over the property and because the City understands that the County supports the annexation.

Considering the Reason Farms property is expected to be annexed to the City in January 2010, the City again requests that the Ad Hoc Committee direct staff to revise the PCCP Conservation Reserve Map to exclude any PCCP designations from the property. Continuing to include Reason Farms as part of the Conservation Reserve Map land inventory sends the wrong message to the resource agencies by suggesting that the County will have land use authority over the property at the time the HCP is proposed for adoption and that the related acreage (approximately 1,700 acres) would be available as part of the baseline assumptions for a potential reserve system. It would be better to account for this reduction in available land now so that the future jurisdictional boundaries under which the proposed Plan would be implemented are accurately represented. Therefore, the City requests that the "Purple" Reserve Acquisition Area designation be removed and the property designated with a notation:

"This property is controlled by a non-participating jurisdiction, is proposed for annexation to the City of Roseville in early 2010 and consequently is not subject to the PCCP"

Reasonably Foreseeable Development Projects

The City has initiated annexation and specific plan processing, or has received a letter of interest for annexation and specific plan processing from the following projects:

- Creekview Specific Plan;
- Placer Ranch Specific Plan; and,
- The Brookfield Development project

The Creekview project was coordinated with the County under the City/County MOU and the County authorized the City to proceed with the proposed annexation project in May 2007. As an outgrowth of the City/USFWS MOU, in March 2007 the City initiated Early Consultation with the resource agencies and in March 2008 an NOP was issued for the specific plan and annexation project. During this process the County did not raise PCCP issues but did recognize and approve of the City moving forward with the project.

In October 2007 the City received an application for annexation and specific plan approvals for the Placer Ranch project and in February 2008 early consultation with the resource agencies per the City/USFWS MOU was initiated (this work is currently suspended at the applicant's request). In June 2007 the Brookfield project submitted a letter of intent for annexation and the Roseville City Council subsequently adopted a resolution acknowledging Brookfield's request. Both of these development proposals were shared with the County and no comments were received relative to the PCCP.

These development projects have applied for specific plan processing and/or have indicated a desire to annex to the City of Roseville. At our September 18, 2008 meeting with the USFWS, County staff acknowledged that the PCCP would not apply to non-participating City annexed properties. Since the City of Roseville is not formally participating in the PCCP and it is anticipated that these properties will be annexed to Roseville, the City requests that the Conservation Reserve map be revised to include the following notation for these properties:

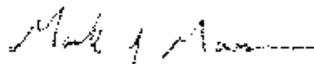
"These areas are expected to be processed by non-participants as "interim projects" subject to the City of Roseville's Early Consultation Process and consequently are not subject to the PCCP. "

Enhanced Coordination

While the above reasonably foreseeable City development projects are currently on hold, we understand that the Brookfield project is interested in enhanced coordination between PCCP planning efforts and their off-site mitigation property. The City is willing to attend any related coordination meetings that may be scheduled. In addition, planning for the Sierra Vista Specific Plan (SVSP) project also continues to move forward. The SVSP public review draft EIR is expected to be released in early November 2009. Project proponents and the City are currently working with the U.S. Army Corps and U.S. Fish and Wildlife Service to reinstate NEPA review and to fine tune the Clean Water Act Section 404 permitting strategy and related mitigation plan, both of which were conceptually developed with input from the federal resource agencies via the City's early consultation process. The City requests that the SVSP federal permitting efforts, enhanced coordination regarding Brookfield off-site mitigation properties, and any similar efforts that may be initiated by the above reasonably foreseeable development projects, be closely coordinated with development of the Agency Review Draft PCCP.

Should you or your staff have any questions regarding the City proposed revisions, please don't hesitate to contact me at 774-5334.

Sincerely,


Mark Murse
Environmental Coordinator

cc: Placer County Board of Supervisors
PCCP Ad Hoc Committee Members c/o Loren Clark
Roseville City Council

From: Julie Hanson [mailto:jmrhanson@gmail.com]
Sent: Thursday, October 15, 2009 3:56 PM
To: Loren Clark
Cc: Christina Snow; Michael Johnson
Subject: PCCP map

Loren,

I am writing on behalf of various owners of land within Placer County regarding the Placer County Conservation Plan. I ask that you consider the following comments and requests in your deliberations on the PCCP map designations.

The first area I would like to address is the property commonly known as the "Placer 962." As you are aware, the western one quarter of the property is "purple." This property is comparable in soil type and vegetation to those areas surrounding it that are not identified as "purple." It is also located in the Sunset Industrial Area, is adjacent to an existing subdivision to the west, the proposed Lincoln General Plan expansion to the north, and the County Landfill and Landfill Expansion Area to the east, and the Placer Parkway and proposed Placer Ranch project to the south. In addition, it does not seem logical to preserve an island of land within the "white" area, especially if there are no significant resources to preserve. We see no basis why this property should be identified as "purple" and respectfully request that you remove this property from any reserve area within the PCCP. We also respectfully request that you carefully review the designations for lands in the vicinity of Brewer and Baseline Roads. I would like to have the opportunity for further discussions with staff regarding this area as well as the Placer 962.

Thank you for your consideration.

Regards,
Julie Hanson